

Our Fourth National Planning Framework

Analysis of responses to the consultation exercise

Analysis report

October 2022



Scottish Government
Riaghaltas na h-Alba
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Contents

Executive Summary	i
Introduction	1
Background to the consultation	1
Profile of main consultation respondents.....	1
Analysis and reporting	3
General Themes	4
Part 1 – A National Spatial Strategy for Scotland	8
Sustainable places	8
Liveable places	12
Productive places	16
Distinctive places	19
Spatial principles for Scotland 2045	26
Action areas for Scotland 2045	33
North and west coastal innovation.....	36
Northern revitalisation.....	48
North east transition	58
Central urban transformation	66
Southern sustainability	84
Overall views	95
Part 2 - National Developments	101
Part 3 - National Planning Policy, Sustainable Places (Universal Policies) ..	132
Policy 1: Plan-led approach to sustainable development.....	134
Policy 2: Climate emergency	136
Policy 3: Nature crisis	142
Policy 4: Human rights and equality	147
Policy 5: Community wealth building	150
Policy 6: Design, quality and place	153
Part 3 – National Planning Policy, Liveable Places	160
Policy 7: Local living	160
Policy 8: Infrastructure first	165
Policy 9: Quality homes	169
Policy 10: Sustainable transport.....	192
Policy 11: Heating and cooling.....	203
Policy 12: Blue and green infrastructure, play and sport.....	211

Policy 13: Sustainable flood risk and water management.....	216
Policies 14 and 15: Health, wellbeing and safety	220
Part 3 - National Planning Policy, Productive Places	225
Policy 16: Business and employment	225
Policy 17: Sustainable tourism	229
Policy 18: Culture and creativity	232
Policy 19: Green energy	235
Policy 20: Zero waste	247
Policy 21: Aquaculture.....	254
Policy 22: Minerals.....	259
Policy 23: Digital infrastructure.....	265
Part 3 - National Planning Policy, Distinctive Places.....	270
Policies 24 to 27: Distinctive places	270
Policy 28: Historic assets and places.....	277
Policy 29: Urban edges	283
Policy 30: Vacant and derelict land	288
Policy 31: Rural places	291
Policy 32: Natural places	300
Policy 33: Peat and carbon rich soils.....	306
Policy 34: Trees, woodland and forestry.....	310
Policy 35: Coasts	315
Part 4 – Delivering Our Spatial Strategy.....	319
Part 5 – Annexes.....	334
Annex A – NPF4 Outcomes statement.....	334
Annex B – Housing numbers	340
Annex C – Glossary of definitions	343
Impact Assessments	345
Strategic Environmental Assessment: Environmental Report	345
Society and Equalities Impact Assessment.....	354
Partial Business and Regulatory Impact Assessment (BRIA)	360
Annex 1 - Organisations responding to the consultation.....	364

Executive Summary

This summary gives an overview of some of the key themes to emerge from the analysis of responses to the Scottish Government's consultation on the Fourth National Planning Framework (NPF4).

The consultation

The draft NPF4 was laid in Parliament on 10 November 2021 for Parliamentary scrutiny. Alongside Parliament's consideration of the draft NPF4, the Scottish Government invited comments from all stakeholders. The public consultation was launched on 10 November 2021 and closed on 31 March 2022.

The consultation asked 70 open questions.

In total 761 responses were analysed, with 539 responses from organisations and 222 from individual members of the public.

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

General Themes

Respondents raised some general themes that were not specific to any particular question.

A number of respondents commented on the inter-relationships between NPF4 and a range of other national, regional or local strategies or plans. Being clear about the relationship between NPF4 and these related strategies was seen as offering the best chance of success, with the quality of alignment seen as key.

In addition to some general statements in support of the inclusion of the National Policy Handbook within NPF4, comments included that greater clarity on the weight of the Universal Policies in relation to other policy areas would be helpful.

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

Part 1 – A National Spatial Strategy for Scotland

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

Most welcomed recognition of the significance of the climate emergency for planning, including reference to the risk to ecosystems and the biodiversity crisis. However, some wished to see a stronger position taken on the climate emergency.

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

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

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

Spatial principles for Scotland 2045

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

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

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

Compact growth was the spatial principle that most divided opinion. On the one hand, some respondents supported the approach set out, including by suggesting that it will be key to sustainable development. Other respondents raised fundamental concerns about this principle. These centred around a view that it is not always appropriate to allocate vacant and derelict land for development, and in particular to allocate derelict land for housing, as a priority over greenfield land.

Action areas for Scotland 2045

General comments included that the spatial strategy action areas provide a strong basis to take forward regional priority actions and that the draft NPF4 does appear to have identified appropriate priorities for different parts of the country. A contrasting view was that this section does not add to what can be delivered by NPF4.

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

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

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

North and west coastal innovation

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

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

Northern revitalisation

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

Four strategic actions were included for the Northern revitalisation action area. There was support for the reference to the importance of renewable energy generation for climate mitigation, and the need for the repowering and extension of existing wind farms. However, there were also calls for clarity on what approach will be followed for new wind farm proposals.

North east transition

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

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

Central urban transformation

Although there were some broad statements of support, a number of respondents raised concerns about either the size of this action area, or the diversity of the communities and places that it covers. There was a particular concern that there is a strong urban focus, and that the challenges and opportunities identified, along with the strategic actions, are not relevant to the significant rural population.

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

Southern sustainability

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

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

Overall views on this proposed national spatial strategy

General comments included offers of support, or support in principle, for the aims of the proposed national spatial strategy. Others, however, suggested that the national spatial strategy is unclear and that it will need significant refinement and expansion if it is to become a useful element in the Local Development Plan (LDP) for any particular area.

Other comments included that the spatial strategy would be helped by indicating the important relationships with other plans, programmes and policies which are fundamental to delivering the overall ambitions.

In terms of how well the spatial strategy considers the needs of Scotland as a whole, it was suggested that the spatial strategy needs to be more consistent

across the regions and recognise the links and interdependencies between them. It was also thought that the spatial strategy and action areas could do much more to address the disparities and inequalities between communities across Scotland.

One perspective was that there is an emphasis on urban needs, with not enough support for the rural parts of Scotland. There was specific reference to the national ambition for appropriate rural repopulation and to considering the needs of remote communities.

An alternative perspective was that there is insufficient emphasis given to urban areas, and a lack of differentiation around towns and cities, which have different requirements and different needs.

National Developments

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

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

Although respondents were not asked directly, a number did comment on whether they supported some or all of the national developments proposed. A small number of respondents simply offered overall support for all of the national developments, while others referenced their particular support for one or more of them. There were also a number of respondents who appeared to support the overall theme of a national development, but then went on to raise a number of issues or concerns about the national development as currently described. Some of the issues raised related to the location of the national development and were sometimes focused on it being expanded to other parts or all of Scotland. Others were focused on one or more of the classes of development as currently described.

National developments to deliver sustainable, liveable places

Six national developments are set out under delivering sustainable, liveable places.

In relation to the Central Scotland Green Network (CSGN), there was a view that NPF4 should more clearly set out how its delivery will be aided through planning. Greater detail and more guidance on how LDPs and spatial strategies should be used to articulate and deliver national developments was suggested. There were also calls for the CSGN network to be expanded to be a Scotland-wide national development, or for the creation of a Scottish Nature Network.

Inclusion of a National Walking, Cycling and Wheeling Network (NWCWN) as a national development was welcomed, although it was also argued that it has limited applicability for reducing routine car journeys in rural Scotland. The importance of

investment to deliver the network was highlighted, including a view that significant infrastructure investment, over and above existing budgets, will be required.

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

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

Some respondents expressed support for the Circular Economy Materials Management Facilities national development, including a view that materials facilities could play a significant role in delivering greater sustainability in the construction and demolition industries. There was also a call for clarity around how this national development will be delivered to avoid unintended outcomes.

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

National developments to deliver sustainable, productive places

Seven national developments are set out under delivering sustainable, liveable places.

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

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

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

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

Comments in relation to Chapelcross Power Station Redevelopment included that there should be a greater emphasis on renewable energy to take advantage of the transmission lines and national grid infrastructure. Other points related to protection of the natural environment including that retaining and enhancing an extensive area of nature-rich unimproved grassland will provide benefits for the local community.

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

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

National developments to deliver sustainable, distinctive places

Five national developments are set out under delivering sustainable, distinctive places.

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

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

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

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

General comments on Edinburgh Waterfront included that there should be read across to the CSGN, NWCWN and Urban Sustainable, Blue and Green Drainage Solutions national developments. It was argued that a focus on Leith to Granton needs to be set in the context of the wider coastal environment and that the potential for negative effects on landscape and seascape need to be addressed.

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

Part 3 - National Planning Policy Handbook

The National Planning Policy Handbook sets out 35 policies. Across the policies, there were frequent requests for greater clarity, including through the inclusion of definitions of key terms and/or by providing further information or guidance. There were also a number of references to policies being strengthened, including by requiring, rather than permitting, their application. This latter point was often connected to the more frequent use of 'must', rather than 'should'.

NPF4 set out six Universal Policies (Policies 1-6) that should apply to all planning decisions. There were a number of comments about how the application of these policies relates to the application of other NPF4 policies, and in particular whether the Universal policies are expected to take precedence.

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

Policy 2 – Climate emergency: In relation to all development proposals giving significant weight to the Global Climate Emergency, most of those commenting supported this policy objective. Respondents suggested that transformational change is required across the planning system, and some felt that the policy is not strong enough to deliver this change. Not supporting development proposals that will generate significant emissions unless it is proven that the level of emissions is the minimum that can be achieved was seen as vital to ensuring that planning can contribute to climate change and nature recovery.

Policy 3 – Nature crisis: There was support for recognition of the nature crisis within NPF4 and for the emphasis on improving biodiversity. One perspective was that the policy should be strengthened further and should require planners to give significant weight to the nature crisis when considering development proposals. An alternative view was that the approach should be more flexible, or more proportionate to the type and scale of development proposed.

Policy 4 – Human rights and equality: Some respondents described NPF4 as an opportunity to build on existing legislation, while others suggested that it is not an appropriate vehicle to meet human rights and equalities duties. It was also suggested that respect for human rights and promotion of equality should be considered across all parts of NPF4, rather than being limited to a single policy.

Policy 5 – Community wealth building: There were some concerns that ‘community wealth building’ is not a well understood concept, including reference to differing interpretations across planning authorities and other stakeholders. It was also suggested that the policy lacks sufficient detail to ensure effective and consistent implementation. There were calls for practical examples of how development plans, and the planning system as a whole, can support community wealth building.

Policy 6 – Design, quality and place: The focus on ensuring good quality design and the importance of design for quality placemaking was welcomed, although some suggested that considerations of viability and delivery can often over-rule quality of design. The reference to ‘high quality’ design was seen as by some as too subjective and it was suggested that further detail is required to support a clear and objective approach to design, and to ensure consistency across planning authorities.

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

Policy 8 – Infrastructure first: Some respondents expressed their support for the infrastructure first approach, including supporting delivery of the infrastructure required by 20-minute neighbourhoods, providing an opportunity to improve active travel infrastructure, and reference to the importance of energy and other infrastructure for delivery of carbon reduction targets. It was suggested that effective delivery will require significant investment, both in terms of strategic infrastructure investment, and ensuring sufficient resourcing of the planning system.

Policy 9 – Quality homes: Aspects that respondents liked included that there is more of a focus on deliverability and that the overall approach has the potential to reduce the variety of approaches taken across planning authorities. A different perspective was that as drafted the policy contains a range of definitive statements, which if taken on their own, could be used to justify inappropriate development.

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

Policy 10 – Sustainable transport: Most of those commenting supported the principle and overall direction set out, although there were concerns that some parts may not be workable in rural and island communities. There were also calls for clearer financial commitments to provide the investment required to support the policy, especially around active travel and public transport infrastructure, and achieving a modal shift from private car use.

Policy 11 – Heating and cooling: There was reference to the contribution that this policy can make to the decarbonisation of heat. Reference was made to the Heat in Buildings Strategy, and there were calls for greater consideration of the affordability of zero emission heating and cooling, for example through links to the Fuel Poverty Strategy. Others raised issues regarding the potential scale of resources required, for example in the assessment of technical proposals.

Policy 12 – Blue and green infrastructure, play and sport: Most respondents were supportive of the policy, although it was suggested that ‘blue and green infrastructure’ should be separated from ‘play and sport’. Some respondents addressed the issues of ‘overall integrity’ and ‘net loss’ and there were concerns that if small amounts of fragmentation are allowed, over time the impact will be cumulative.

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

Policies 14 and 15 – Health, wellbeing and safety: There was support for health and wellbeing being part of the planning process, and an appreciation that the planning system could do more to support healthier places and tackle health inequalities. Some were looking for an explicit statement that development proposals detrimental to active lifestyles and wellbeing will not be supported.

Policy 16 – Business and employment: There were mixed views on the policy. While there was general support for its ambitions, including the linking of investment with the transition to net zero and supporting a nature positive approach, there were concerns that the policy, as it currently stands, will not achieve its aims. There were calls for guidance on how critical aspects of the policy, such as net economic benefit, could be demonstrated and assessed.

Policy 17: Sustainable tourism: Whilst most respondents recognised the importance of sustainable tourism and supported the key principles set out, there were mixed views about the proposal that LDPs should be used to support the tourism sector and identify proposals for tourism development.

Policy 18 – Culture and creativity: Many respondents welcomed the inclusion of a specific policy covering culture and creativity, including because of the recognition this gives to our important and diverse creative and cultural sector. However, some

were concerned that the policy silos culture, and does not embrace the ways in which cultural activities can support the delivery of other NPF4 policies.

Policy 19 – Green energy: Respondents were relatively evenly divided between those who thought the policy will meet the stated objectives and those who thought it would not. It was argued that it lacks detail on how the planning system should support renewable energy development or the implications of such an approach where a range of planning considerations need to be balanced.

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

Policy 20 – Zero waste: In terms of an overall balance of opinion, respondents tended to support the policy. However, there were calls for a stronger focus on developing a circular economy. Reuse of existing buildings was highlighted as an important element of the circular economy that currently has limited coverage. Suggestions included that it might be preferable to draft a circular economy policy, with zero waste as a component part, or that a standalone circular economy policy would allow many other aspects to be explored more fully.

Policy 21 – Aquaculture: Most of those commenting supported the focus on the sustainability of aquaculture, including minimising environmental impacts. Some suggested that the policy is too focused on supporting investment and does not give sufficient priority to the environment. Others suggested that the policy could be more supportive of growth in the aquaculture industry and wanted to see new aquaculture activities supported by the planning system.

Policy 22 – Minerals: Reasons given for supporting the policy included the need to ensure an ongoing supply of minerals and that, without a steady and adequate supply, the delivery of housing, infrastructure, other developments and manufacturing cannot be assumed. Others had broad concerns, including that there does not appear to be an assessment of the level of need for the products extracted. There was a call for more emphasis on minimising the use of new minerals in line with the principles of a circular economy.

Policy 23 – Digital infrastructure: Most supported the focus on ensuring all of Scotland’s places are digitally connected and felt that the policy provides a positive framework against which delivery of digital infrastructure can be assessed. There was also support for the particular focus on areas with no or low connectivity. Respondents highlighted the importance that all parts of Scotland have access to suitable digital infrastructure, with reference to the negative economic impacts of poor digital connectivity, particularly in rural areas.

Policies 24 to 27 – Centres, retail, town centre first assessment and town centre living: There were positive comments on the role of LDPs in creating sustainable futures for cities, towns and local centres, alongside the principles of

20-minute neighbourhoods. There was also support for the focus on town centres and the recognition of their importance in many aspects of placemaking, health and quality of life. The further restrictions on out-of-town shopping proposals were also supported.

Policy 28 – Historic assets and places: Many respondents welcomed the protection and enhancement of the historic environment, and there was support for the reuse of redundant or neglected historic buildings. However, there were also concerns that the policy could prevent developments that address climate change issues from going ahead.

Policy 29 – Urban edges: There was general support for the policy, with respondents welcoming the use of green belts to help regulate development outside urban centres and limit urban expansion. However, some respondents had concerns, including that it refers to the green belt. The connected concern was that this may encourage planning authorities to adopt a brownfield-only approach.

Policy 30 – Vacant and derelict land: There was broad support for this policy, which was seen as critical to protecting greenfield land and the reuse of underused land. A number of respondents noted the challenges associated with the reuse of vacant and derelict land and buildings, including around costs limiting the market's ability to develop sites. It was noted that public sector investment is often required, and also that many of the more straightforward sites have already been developed, with those remaining generally needing more significant remediation.

Policy 31 – Rural places: Some respondents welcomed the inclusion of a policy specifically for rural places or indicated support for the intent and ambitions set out. However, it was also suggested that the policy is too broad, or that the support for new development in rural areas risks undermining sustainability and climate change objectives. There was also a view that, as drafted, the policy will not deliver the outcome of increasing the population of rural areas.

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

Policy 33 – Peat and carbon rich soils: There was broad support this policy, although some thought it should go further in protecting peatlands. It was suggested that it should be strengthened in terms of peatland restoration and that a proactive approach to restoration should be adopted. In terms of development on peatland, some argued that, as drafted, there are too many exceptions or too much leeway for developers. Other respondents welcomed the absence of a blanket ban on development.

Policy 34 – Trees, woodland and forestry: General comments included that the acknowledgement of the importance of trees and woodland in meeting climate targets and reversing biodiversity loss is welcome. It was also suggested that the protections provided could be strengthened further, and the importance of preserving native woodland was emphasised. An alternative perspective was that proposed protections go too far in protecting woodland at the expense of development needed to deliver net zero.

Policy 35 – Coasts: Respondents tended to support the policy, although there were concerns that the emphasis is on the immediate and short-term climate change risks at the coast. Respondents were looking for more of a focus on protecting the marine environment, restoring blue carbon habitats as a nature-based solution and on creating and supporting sustainable coastal communities.

Part 4 – Delivering Our Spatial Strategy

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

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

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

Part 5 – Annexes

Annex A – NPF4 Outcomes statement

In terms of development under NPF4 contributing to the six statutory outcomes identified in the Town and Country Planning (Scotland) Act 1997, there was a call for stronger emphasis on the delivery of sustainable development. It was also suggested that the delivery of statutory outcomes should be integrated with other NPF4 components, such as the four spatial strategy themes and the six spatial principles.

There was particular support for the inclusion of health and wellbeing as a statutory outcome for NPF4, as well as for the focus on increasing the population of Scotland's rural areas. However, there were concerns that the draft NPF4 does not provide a sufficiently comprehensive or detailed framework to address the priorities of Scotland's rural areas.

Annex B – Housing numbers

With regard to the MATHLR numbers set out, the majority of ‘Local Authority’ respondents reported that the Scottish Government took an inclusive approach to arriving at MATHLR numbers and that they agreed with the MATHLR for their area.

However, other respondents raised significant concerns, including that the methodology and Housing Need and Demand Assessment tool used to inform the MATHLR figures are inadequate and flawed. There was also reference to a lack of ambition, with alternative and higher MATHLR figures suggested for some Local Authority areas. In contrast, some respondents considered that the approach to the MATHLR has artificially inflated housing figures and has not taken account of population declines.

Introduction

Background to the consultation

This report presents the analysis of responses to the Scottish Government's consultation on the Fourth National Planning Framework (NPF4).

The National Planning Framework is a long-term plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth. The current National Planning Framework (NPF3) was published in 2014.

The draft NPF4 builds on two previous rounds of engagement – the Call for Ideas and the Position Statement. NPF4 will, for the first time, incorporate Scottish Planning Policy (SPP) which contains detailed national policy on a number of planning topics. The draft NPF4 contains a spatial strategy, details of national developments, and detailed policies across four themes. Once adopted, the national planning policies (set out in Part 3) will be part of the statutory development plan. This is expected to improve the predictability and consistency of the Scottish planning system, and set a clear direction for planning decisions.

The draft NPF4 was laid in Parliament on 10 November 2021 for Parliamentary scrutiny. Alongside Parliament's consideration of the draft NPF4, the Scottish Government invited comments from all stakeholders. The public consultation was launched on 10 November 2021 and closed on 31 March 2022.

The consultation paper can be found on the [Scottish Government's web page](#), with a range of information relating to NPF4 available on the [Transforming Planning](#) pages.

The consultation asked 70 open questions.

Profile of main consultation respondents

In total 761 responses were analysed. Where consent has been given to publish the response, it can be found on the [Scottish Government's web page](#).

Respondents were asked to identify whether they were responding as an individual or on behalf of a group or organisation. A total of 539 responses were submitted by organisations and 222 by individual members of the public. The Woodland Trust also submitted a petition with 1,481 signatories.

Organisational respondents were allocated to one of 22 groups by the analysis team and the Scottish Government.

A breakdown of the number of responses received by respondent type is set out in Table 1 below and a full list of organisational respondents can be found at Annex 1.

Table 1: Respondents by type

Type of respondent	No.
Organisations:	
Active Travel-related Third Sector Organisation or Campaign Group	9
City Region or Strategic Development Planning Authority	3
Community Council or Residents' Association	41
Culture or Heritage Company, Association, Trust or Representative Body	22
Development, Property or Land Management Company or Representative Body	82
Energy-related Supplier, Developer, Association or Representative Body	58
Environment or Natural Heritage-related Third Sector Organisation or Campaign Group	46
Housing Association	7
Local Authority	37
NHS	9
Other	2
Other Infrastructure-related Company or Representative Body	9
Other Private Sector	22
Other Representative Body, Faculty or Network	40
Planning, Architecture or Housing Representative Body or Campaign Group	21
Planning, Development, Architectural or Environmental Consultancy	20
Public Body, Commission or Taskforce	22
Regeneration or Planning Partnership or Trust	12
Research, Academic Group or Think Tank	12
School or Nursery	7
Third Sector, Community or Campaign Organisation	39
Transport Partnership	6
Transport-related Body, Association or Provider	13
Organisations	539
Individuals	222
All respondents	761

Analysis and reporting

After a short chapter setting out some general themes raised by respondents, the remainder of this report presents a question-by-question analysis of the comments made to the main consultation. Readers may need to refer to the draft NPF4 to set the analysis in context.

A number of respondents did not make their submission on the consultation questionnaire but submitted their comments in a statement-style format. This content was analysed under the most directly relevant consultation question.

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

General Themes

This section sets out some general themes raised by respondents that were not specific to any particular question. Comments may have been made in general remarks or at one or more of the main questions. Respondents sometimes raised the same issue at a number of questions or cross-referenced between their answers.

Strategic hierarchy and relationships

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

At a national level, it was noted that the aims of NPF4, chiefly the just transition to net zero, adoption of place-based working and delivery of a wellbeing economy, are shared across a number of current and emerging strategies and statutory documents. Strategies referenced included the National Strategy for Economic Transformation (NSET), Heat in Buildings Strategy, Town Centre Action Plans, Land Use Strategy and the forthcoming Biodiversity Strategy.

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

An example given was the just transition to net zero, the Heat in Buildings Strategy, and Policy 11 (Heating and cooling). It was noted that this policy considers how Local Development Plans (LDPs) take Local Heat and Energy Efficiency Strategies (LHEES) and Heat Network Zones into account, as well as the infrastructure required to decarbonise heat generation. The Heat in Buildings Strategy underpins the entirety of this work, and will be fundamental to successfully decarbonising heat generation, but is not referenced in the policy or elsewhere in NPF4.

At a local or regional level, it was suggested that it would be helpful if NPF4 more clearly set out its connections with:

- LDPs, including some explanation as to how the various components of LDPs would interact with the content of NPF4.
- Regional Spatial Strategies, including the extent to which these have to align with NPF4.

Also at a regional level, there was a concern that there is insufficient reference to Regional Transport Strategies (RTSs), particularly given that they are the statutory transport policy documents which will shape and deliver changes to the transport system.

Structure of NPF4

Respondents also commented on the relationship between the different parts of the draft document, as well as its overall structure. One view was that the draft NPF4 is currently not as well framed as many LDPs. Specifically, it was suggested that the good practice that has emerged through the examination of LDPs by the Scottish Government's Planning and Environmental Appeals Division does not appear to have been adopted.

Suggested changes or additions to the document included:

- Setting out the interconnections across the national spatial strategy, national developments and policy handbook. It was suggested that it would be helpful if the framework could be presented in way that clearly articulates the interconnectivity between these, and what this means for planning processes.
- The use of schematics that illustrate how the different elements of NPF4 come together at different scales through a place-lens would be helpful. This would also help strengthen more collegiate approaches to development in line with the Place Principle. It was suggested that a stronger framing of this principle throughout the document is needed.
- Adding a statement in the early part of the document on how it complies with the various statutory requirements of the Town and Country Planning (Scotland) Act 1997 (as amended), and other related legislation, would be helpful.

Part 3 - National Planning Policy Handbook

In addition to some general statements in support of the inclusion of the National Policy Handbook within NPF4, there were a number of general comments about Part 3 overall, and the importance of the policies contained therein. They included that the policies do not necessarily match the ambitions of the statements in Part 1. The concern was that they are either less onerous, or are so loosely framed that it would be easy for development to technically meet the policy while not complying with the main aims of NPF4.

Other comments considered the relationship between the policies themselves and included that there is no clear hierarchy, and that this could lead to slower decision-making and could jeopardise the successful implementation of the spatial strategy. There was a call for further guidance on how planning authorities should balance potentially competing policy areas in order to avoid the risk of costly and resource intensive challenges that can cause delays in delivering development.

Specifically, there was a call for greater clarity on the weight of the Universal Policies in relation to other policy areas. It was suggested that this would help establish priorities in planning decisions where there may be potential conflicts.

More generally, it was suggested that there is a clear need for internal consistency within NPF4, but that there are currently some issues. An example given was that the policy on greenfield developments (Policy 30, part (c)) cuts across other aspects of NPF4 and it is not clear how a decision-maker is supposed to grapple with this.

Another potential tension identified was whether planning authorities will want to adopt the policies set out in NPF4 in full, or may wish to adapt them for the circumstances within their local area. The extent to which planning authorities will have freedom to adapt the policies was said to be unclear. There was an associated call for far more clarity on the status of various aspects of NPF4 in terms of forming part of LDPs. It was suggested that it may be helpful to split policies into those requiring to be addressed in LDPs and those that require to be considered in each development application.

Finally, it was suggested that there appear to be some notable policy omissions, including on some of the matters of importance to the national economy. There was specific reference to air travel, oil and gas, the transition from fossil fuels, and nuclear energy.

Language used across NPF4

A frequently-raised issue, both in general observations and at a number of specific questions, related to the wording used across NPF4, and in particular in Part 3.

There were two main concerns, the first being the frequent use of ‘should’, particularly in a number of the policies. It was suggested that this is ambiguous, and it is not clear where this means that the relevant policy must be complied with. Further comments included that the meaning of planning policy, including development plan policies, is a matter of law rather than judgment and that legal meaning must be clear, and be able to be understood by all parties.

It was acknowledged that the Scottish Government explained the rationale behind the use of the word ‘should’ during a Scottish Parliamentary evidence session before the Local Government, Housing and Planning Committee on 18 January 2022, but there remained a concern that the explanation will not be sufficient to provide the necessary clarity for those using NPF4 going forward.

The other concern was around references to development being ‘supported’ or ‘not supported’, and there was a question as to whether this means that development is to be approved or not to be approved? It was also noted that some policies use language to suggest that ‘if X is not done, the application should not be granted’. Linking back to issues around the hierarchy of policies, it was suggested that it is not clear from such language whether this is intended to mean that one or more policies will trump others in the development plan.

Next steps

There was also a request to ‘press the pause button’ on the progress of NPF4. This was associated with some of the concerns outlined above, or in the analysis for Part 4 – Delivering our spatial strategy. They included that further work is required to clarify what the Scottish Government is seeking to achieve and to identify the means by which the core ambitions of NPF4 might be delivered. If the process were to be paused, the suggested next steps were to:

- Engage further with all key stakeholders to radically rethink the spatial and organisational framework for delivering NPF4.

- Establish a dedicated and specialised national agency with real expertise in the social, environmental and economic aspects of spatial development of housing and infrastructure at different scales.

Part 1 – A National Spatial Strategy for Scotland

Sustainable places

Our future net zero, nature-positive places will be more resilient to the impacts of climate change and support the recovery and restoration of our natural environment.

Question 1 – Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Around 430 respondents made a comment at Question 1.

Some comments were extensive, addressing issues considered in more detail at subsequent questions on national planning policies. The analysis presented below focuses on the more frequently-raised themes that address the commentary on Sustainable places set out in the draft NPF4.

Many of those commenting supported the prominent role given to sustainable places and the vision of net zero, nature-positive places. This included particular support for the commitment to deliver positive biodiversity impacts, encouraging low and zero carbon design, retrofit and energy efficiency, and reducing unsustainable travel. Comments also included support for what was seen as a clear change in tone from previous NPFs, with a stronger focus on climate change and nature recovery. Respondents agreed that these must be central principles for the planning system.

However, it was also suggested that the commitment to sustainable places should be strengthened, reflecting a view that the national policies set out in the draft NPF do not reflect the urgency required to achieve net zero targets. These respondents suggested a much more ambitious approach to the delivery of the priorities set out under Sustainable places. In addition to calls for stronger use of language across the national policies, some wished to see a statutory requirement for planning decisions to favour net zero and nature recovery objectives, for example over economic growth. There were also calls for NPF4 to specify long-term and interim targets, detail the investment required to achieve these, and set out an effective delivery mechanism, including robust monitoring. Some suggested that, in the absence of these elements, NPF4 does not represent a genuine commitment to deliver the transformative change referenced.

Respondents also suggested that a more coordinated approach to delivery of sustainable places is required. There were calls for better integration of the Sustainable places ambitions with other strategic priorities set out at Part 1 of the draft NPF4, and with the national policies (at Part 3) which are expected to deliver these ambitions. It was also noted that several relevant plans and policies are yet to be finalised, such as the consultation on Environmental Principles, the revised

National Marine Plan, the Vision for Aquaculture, and the new Biodiversity Strategy. Some suggested that these must be in place before the NPF4 approach to delivering sustainable places is finalised. Some also felt that the draft NPF is too focused on the delivery of future sustainable places, and called for a more balanced approach that also prioritises making existing places sustainable.

There was also some concerns that the introduction to the Sustainable places section presents a limited definition of sustainable development. In particular, there were calls for it to better reflect the social and economic aspects of sustainable development, alongside the environmental ones. This included reference to broader definitions set out in existing SPP and reflected in NPF4 national policies such as Policy 6 (Design, quality and place). Some suggested that, in contrast to environmental sustainability, the draft NPF4 takes a more passive approach to the social and economic elements of sustainable places. However, comments also highlighted the need to address the potential for conflict between the economic aspects of sustainability, and the focus on climate change and nature recovery.

Delivery of sustainable places

Most of the comments at Question 1 addressed the deliverability of sustainable places as set out in the draft NPF. This included observations that the policies set out in Part 3 lack the detail required to support the ambition of the introduction to the Sustainable places section. Specific concerns raised included that:

- The absence of a Delivery Programme makes it difficult to understand how the ambitions set out will be delivered.
- NPF4 should recognise that the delivery of sustainable places must respond to differences in community needs and infrastructure requirements across urban and rural areas. This reflected a view that the draft is overly focused on planning and development in urban areas.
- Planning authorities will require additional resourcing to deliver the necessary assessment and enforcement functions, and a deeper pool of technical knowledge, including through a role for external expertise.
- There is a need to define key concepts for Sustainable places, such as 'nature positive', 'nature-based solutions' and 'positive effects for biodiversity' – the latter including some preference for the term 'biodiversity net gain'. There were also calls for these definitions to be supported by practical examples of how concepts are expected to be reflected in local decision-making.
- Detail on the potential scale of investment required to deliver NPF4 policies would be helpful, including concerns around the investment required to deliver necessary infrastructure improvements, for example to support active travel and decarbonised energy supply. This reflected a view that the delivery of sustainable places is likely to incur a higher cost than unsustainable alternatives.

- There were calls for NPF4 to reflect the presumption in favour of sustainable development as set out in SPP. The removal of this presumption was described by some as a retrograde step.

Several respondents expressed a view that a successful and sustainable property development industry has a key role to play in the delivery of sustainable places, and meeting climate change and emissions reduction targets. These respondents highlighted the role of the industry in working with authorities to plan for sustainable places, including more sustainable transport modes, decarbonised energy and heat and integrated blue green infrastructure.

Some felt that the delivery of sustainable places and climate targets will require a shift in attitudes and design approaches across the development industry and other sectors. It was suggested that the draft NPF4 could be more forceful in its language use to encourage this.

The circular economy was seen by some as critical in the delivery of sustainable places. In addition to a perceived need for a more prominent role for the circular economy in national policies, it was also suggested that this should be an overarching theme.

The climate emergency, biodiversity and nature recovery

Many of those commenting welcomed recognition of the significance of the climate emergency for planning, including reference to the risk to ecosystems and the biodiversity crisis. There was also support for reference to the need for a rebalancing of the planning system to set climate change and nature recovery as the primary guiding principles.

However, some wished to see a stronger position taken on the climate emergency. This reflected a view that there is a significant possibility that net zero emissions targets for 2030 and 2045 will not be achieved in the context of the draft NPF4. There were calls for a stronger focus on emissions reduction, suggesting that the draft does not currently deliver the required rebalancing of planning considerations to achieve net zero targets. Respondents also wished to see reference to the reuse and retrofitting of existing buildings to support the delivery of carbon reduction targets.

Some saw a need for clearer links between nature restoration and climate resilience. This reflected support for the identification of climate change and nature recovery as key guiding principles, and it was suggested that these principles must have primacy over other NPF4 policies. There were also calls for further detail on what constitutes 'nature-based solutions' to support nature recovery. Comments also identified the potential for conflict between climate and nature recovery objectives, for example where development or mitigation measures required for carbon reduction, may have unavoidable adverse impacts on biodiversity. Respondents sought further clarity on how these 'trade-offs' should be determined.

It was suggested that reference should be made to how the planning response to the climate emergency and nature recovery relates to other policy, including the Land Use Strategy.

Reducing unsustainable travel

The reference to reducing unsustainable travel was welcomed, reflecting a view that reducing transport emissions will be a key element in delivery of net zero targets. This included calls to support the integration of transport planning and development planning to ensure a cohesive approach.

Some felt that the language used at this section could be improved, for example suggesting a more positive focus on increasing use of sustainable travel, rather than reducing use of unsustainable modes of travel. It was also suggested that NPF4 should make reference to the need to reduce travel as a whole (including reference to the role of 20-minute neighbourhoods), in addition to ensuring that all travel is sustainable.

Respondents highlighted a range of considerations relating to transport sustainability which they wished to see reflected. These included the role of active travel in reducing transport emissions, ensuring that the location and design of new development supports sustainable travel, and the need for built spaces that are accessible and equitable for everyone.

Renewable energy generation

There was support for the reference to renewable energy under Sustainable places, with respondents suggesting that the planning system has a key role to play in ensuring the expansion of renewable energy generation.

However, some wished to see a stronger focus on the role of renewable energy production, including on transmission and distribution infrastructure. It was suggested that NPF4 policies must recognise that a rebalancing of planning considerations is required to achieve the necessary increase in renewable energy generation. Respondents also saw a need for greater clarity on the weight to be attributed to climate change, nature recovery and energy. This included calls for a spatial framework for the delivery of onshore wind infrastructure, while ensuring that biodiversity is protected and enhanced.

Other themes to be referenced

Respondents also highlighted a range of other themes they wanted to see referenced in relation to sustainable places. These included:

- The role of the historic environment in creating sustainable places.
- How Scotland's housing crisis can be addressed alongside net zero targets and nature recovery, including calls for reference to Housing to 2040 and A Scotland for the Future.
- The role of adaptation for flood risk in building climate resilience.

Liveable places

Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live.

Question 2 – Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Around 400 respondents made a comment at Question 2.

Some of these comments were extensive, and addressed issues covered in greater detail at subsequent questions. The focus of the analysis here is on more frequently raised themes, and in particular those which address the commentary on Liveable places.

Many of those commenting welcomed the focus of the Liveable places section, with some suggesting that the overall approach appears to cover most of the important aspects of delivering homes and neighbourhoods which are better, healthier and more vibrant places to live.

However, it was also suggested that this section could be better articulated, or that it needs to be reinforced and strengthened into something that resembles an approach to development that can be delivered by the planning system. An associated comment was that this section of the spatial strategy has the weakest links with Part 3 (National Planning Policy Handbook).

With reference to some of the language used, it was suggested that there is a lack of clarity, and that some of the terms used are ambiguous. Examples given included what 'better' places means in practice, and how 'high quality' and 'great places' can be defined.

Other general concerns included that the approach appears geared towards urban living, and that many of the aims will be less achievable in more rural and dispersed areas. It was suggested that a one-size-fits-all approach does not take into account differing needs, and geographical and climate challenges.

It was noted that communities have adapted over time to work with their environments, but that this spatial principle seems to suggest that all communities need to change the way they live in the future. It was reported that in some areas, many communities do not require transformative social and economic change of the kind described.

Other general comments included that:

- The Place and Wellbeing outcomes identified by the Improvement Service (as set out in their 'Integrating land use planning and public health in Scotland') should be referenced.
- Net zero is not mentioned anywhere within this section and liveable places by their very nature should be shaped by net zero.

- The opportunity NPF4 offers to address longstanding inequality and eliminate discrimination is welcome, although there is little mention throughout the document of specific attention to women, those with disabilities or people from ethnic minorities, for example.
- NPF4 should consider the needs of wheelchair users throughout.

Delivery of liveable places

A number of the comments addressed the deliverability of liveable places, with observations including that there is very little detail on how transformative social and economic change is going to be delivered. It was suggested that:

- Planning will not achieve this on its own and a multi-agency, public/private approach will be needed. Delivery and implementation of this approach will require a radical rethink as to how we plan places, and the approach from key agencies, the private sector and the development industry.
- A deep understanding of local context is required, so NPF4 should be more explicit in stating that LDPs will be key to delivery, and what policies mean in different authorities.
- Stronger policy wording is required throughout to assist with decision-making on planning proposals. The transformative change advocated will be difficult to achieve without empowering local planning authorities to implement planned improvements.
- Practical detail would be helpful, including in relation to how the necessary investment will be found. There was also a suggestion that delivering the intended approach is likely to be more expensive than current approaches.

Healthy and active communities

It was noted that encouraging healthier lifestyles and more physical activity can improve the quality of life and mental wellbeing of society, and there was support for it being seen as a priority.

Explicitly recognising planning's role in supporting better health and wellbeing actions was seen as encouraging, and it was suggested that planning policy is pivotal in creating healthier communities. Taking a public health approach to planning was described as central to efforts to tackle health inequalities, and it was suggested that the Liveable places principles, along with Policy 14 (Health and wellbeing) could be strengthened. However, it was also suggested that addressing the significant health inequalities that our communities experience will take generations and, in some instances, a major societal shift that is outwith the remit of planning.

There was a call for more clarity and direction around how NPF4 will achieve or influence these real-life issues. There was also a suggestion that the population groups most affected need to be identified, and that there needs to be recognition of the many factors that may impact on whether someone views their community as being inclusive, empowering, resilient and safe. There was also a call for NPF4 to recognise the barriers that different people may experience, and the need to ensure

that these are addressed in order to achieve the vision of creating better, healthier and more vibrant places.

Impact of COVID-19

The recognition of the impact of the pandemic on changing views of place was generally welcomed, although it was suggested that it could be expanded upon to set out how this will impact on the liveability of spaces, and what changes will be needed in the future to create resilience and capacity.

Further comments included that this is a key time to enact positive change, building on lessons learned throughout the pandemic, and that this also creates an opportunity to address the deep-rooted inequalities in our communities, some of which have been exacerbated by the pandemic. It was noted, however, that as a nation we also have wider, more long-standing health issues that need to be addressed.

Empowering communities

A number of respondents commented on the importance of communities being empowered, including that in order to make our future places better, healthier and more vibrant, communities need to be empowered to be the key drivers of this change. However, there was a concern that referring to 'hoping' to empower more people to shape their places seems to suggest that the knowledge, resources or ambition to do so is lacking.

There was a call for a clear commitment to community empowerment, with planning taking a proactive approach to enabling communities to shape, and benefit from, the development of their places. Further comments included that communities need:

- A level playing field, where they are recognised as key stakeholders and given the same rights as developers, including a right to appeal planning decisions.
- To be given the resources and active support to develop community-led Local Place Plans. It was suggested that the sharing of experience, skills and resources is required and that some communities are likely to require significant assistance.

There was a concern, however, about the lack of reference to additional resources being required. It was reported that many community groups lack basic building blocks, including funding, skills, a good quality meeting place, and an inclusive structure, all of which are required to effectively represent a community and meaningfully influence local regeneration on the community's behalf.

In relation to different members of the community, it was noted that input from children and families will be key to making places, homes and neighbourhoods better places for them to live. It was also suggested that ensuring that women are involved in consultation and planning will have a beneficial impact.

Good quality homes

The reference to good quality homes was also welcomed, although it was noted that there is no reference to the Government's first long-term national housing strategy, Housing to 2040. As with other policy themes, there was a call for further detail on how more affordable homes can be delivered.

It was seen as critical that the policy background within NPF4 translates into a supportive planning environment that delivers the mixed tenure homes needed. A specific suggestion was that housing delivery should be identified as a national development.

In terms of particular housing needs, the lack of reference to older people's housing was considered disappointing. It was seen as vital that housing for older people is central to the Scottish Government's plans to ensure we are building for the future, but there was a view that at the moment NPF4 falls well short, including around joining up housing and social care.

It was also noted that for people with terminal illnesses, creating communities which are inclusive, empowered, resilient and safe must also include homes which are accessible and adaptable.

20-minute neighbourhoods

The inclusion of 20-minute neighbourhoods was also welcomed, although it was suggested that despite being frequently referenced, there is a lack of information about how the approach can be delivered in practice, particularly in rural areas. It was suggested that the concept has strong urban connotations, and could actually lead to the displacement of smaller, more fragile communities towards bigger population hubs. It was thought that this does not fit with NPF4 objectives around population and sustaining rural communities.

There were also questions about how the approach can work in existing communities, including the retrofitting of existing areas lacking in facilities and linkages, and how these can be made viable. It was also suggested that there should be focus on communities themselves defining what their neighbourhoods look like, rather than having a centrally-imposed expectation that they should fit the 20-minute model.

Other comments addressed the travel and other infrastructure required to deliver 20-minute neighbourhoods, but also liveable places more broadly. Given the importance of sustainable transport and connectivity, it was suggested that these themes should be referenced along with housing, services, open space and culture. More generally, it was suggested that transport considerations need to be properly built into the planning system if Scotland is to reach its net zero target by 2045 as planned.

Other themes to be referenced

Respondents also highlighted a range of other themes they wanted to see referenced in relation to Liveable places. These included:

- The Place Principle and place-based approaches. Also, local design initiatives and the role they can play.
- The demographic structure of Scotland, and the nature of the need and demand that will flow from it. Also, increasing the population of rural areas.
- Changing work patterns following the pandemic, and the need to accommodate increased working from home.
- Green spaces and community food growing.
- The food environment and the important role of planning in this regard.
- The ambitions of the National Culture Strategy and the role of local creative activity.
- Recognition that the historic environment plays an important part in the wellbeing agenda.
- The Gaelic language and culture, and its connection to health and wellbeing.

Productive places

Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing.

Question 3 – Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

Around 385 respondents made a comment at Question 3.

There was support for the focus on the just transition to net zero and a nature-positive economy. It was noted that the move to a greener economy could provide opportunities for business development, job creation and investment in communities, through community wealth building.

Other respondents welcomed the approach but commented that the policy lacks detail. It was felt that this could make it more difficult to enforce and deliver, as there is no delivery strategy or no timescales have been set out

Some respondents commented that the ambition of the Productive places section is too narrow and similar to what is currently in place. Others were concerned that the idea of a ‘wellbeing economy’ is relatively new to land use planning. It was suggested that without training, planners may find it challenging to interpret approaches such as ‘community wealth building’ and other concepts when considering development proposals or LDPs.

There were also concerns about the dichotomy between economic growth and zero carbon and green recovery objectives. There was a view that the latter objectives cannot avoid being compromised to achieve business and economic growth. It was suggested that guidance and best practice advice are needed to help planning authorities accomplish the balance of delivering investment, sustaining existing

businesses, and building a wellbeing economy. It was noted that this tension is also apparent in the NSET. Other respondents observed that there should be alignment between NPF4 and the NSET.

Other general comments included:

- There is an alignment between a community wealth building approach to local economic development and 20-minute neighbourhoods, which is not reflected in Productive places.
- There is reference to using places to stimulate entrepreneurship. However, there is a lack of reference to direct interventions that will deliver the level of stimulus needed to boost Scotland's entrepreneurial base.
- Land ownership inequality undermines productive places. The planning system can play a role in addressing unequal land ownership and use by supporting community wealth building.
- To avoid misinterpretation, definitions should be provided for a number of terms used including 'community wealth', 'fair work', 'good green jobs', 'green investment', 'wellbeing economy', 'nature-positive economy', and 'just transition'.

Rural, highlands and islands

Some respondents made specific comments on applying the policy to rural, highland and islands settings. It was observed that the distinctive socio-economic contexts and particular market characteristics of these areas include increased social enterprise, under-employment, and a plurality of employment that requires a flexible, responsive approach to development, taking account of local context and need.

Comments relating to these issues included:

- Remoteness from economic and population centres results in relatively expensive transport, and associated challenges for developing businesses. Investment is needed to unlock the economic potential of island communities, depending on the needs and characteristics of the area.
- Businesses in rural locations that significantly increase car journeys should not be supported unless there is a locational requirement or adequate sustainable travel provisions.
- Housing is essential as the population increases (especially in rural areas) as it can bolster local economies.
- Some planning authorities have resisted the pressure for developments in smaller towns, rural areas and areas around large cities. Embracing localism, and a more sustainable future where people travel less, may require a rethink.

It was also observed that digital connectivity should be addressed more fully as it will contribute to increasing the attractiveness of productive places, particularly those in more rural locations. It was acknowledged that digital infrastructure and planning policy is set out in Policy 23 (Digital infrastructure), but it was suggested

that it should also be referenced under Productive places as it is critical to the economy and wellbeing of remote, rural and island places. The connection was made to combatting the ongoing depopulation of Scotland's rural communities and making these areas more attractive to working-age people.

Net zero

There were a number of comments on the role of net zero and renewables.

Some respondents observed that it would be helpful to set out a specific ambition to support a circular economy that could use Scotland's low-carbon energy system to manufacture goods with lower carbon footprints. It was noted that this could also provide local employment through increased opportunities to repair, reuse, refurbish and refill.

It was suggested that distribution networks need support to become more sustainable and that reaching a net zero, nature-positive economy requires rethinking centralisation and economies of scale. It was reported that this can be applied to transporting both raw materials and finished products and that modern technology can facilitate processes locally that were formerly only available at scale.

Other comments included:

- NSET identifies support for the transformational economic potential of Scotland's offshore wind sector. The Productive places section should position Scotland's planning system as an enabler of growth in the offshore wind and low carbon infrastructure sectors.
- Care needs to be taken that the requirement to stimulate investment and business does not work against the achievement of the over-arching requirements to restore ecological function and biodiversity, and address climate change mitigation.

Omissions

Several respondents highlighted areas that they felt were omitted from the policy.

There were concerns that issues of poverty and inequality are not highlighted prominently enough, particularly as many deprived places will not become productive places without long-term regeneration and support. A related observation was that community planning legislation needs to be focused on the economic, social and environmental wellbeing of local people rather than being driven by market forces and big business.

Some respondents noted the contribution that housing could make, with further comments including:

- The delivery of good quality social housing in deprived places, where high housing need is often evident, can act as a balance to market pressures.

- Prioritising the refurbishment of vacant buildings could reduce the high carbon cost of new housing developments.
- House building provides homes and economic benefits, including job creation, supply chain support, and improvements to existing local infrastructure.

Other suggested omissions included:

- The policy should support ambitions around health and wellbeing.
- There is little or no mention of the importance of community business and social enterprise.
- There is no reference to the production of food, through crofting and agriculture, or otherwise.
- Reference should be made to the contribution that culture and heritage can play in improving economic, social, and environmental wellbeing. Cultural and heritage assets can be an anchor for the regeneration of places, helping to build a sustainable local economy.
- This section of NPF4 could reflect that land is not a commodity, but should be viewed in terms of the social and environmental benefits it provides to all.

Distinctive places

Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. This will ensure that people value, enjoy, protect and enhance their environment.

Question 4 – Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Around 360 respondents made a comment at Question 4.

Many respondents expressed support, or support in principle, for the focus of Distinctive places. Others noted that they supported the aims or aspirations set out, or highlighted particular elements with which they agreed. It was observed that the concept of distinctive places is already well embedded in the planning system and that Scotland already has many distinctive places which should be celebrated. Providing further detail on measuring the distinctiveness of a place was suggested.

There was also a view that the policies grouped in this section lack coherence, with a specific suggestion that ‘safe and pleasant, easy to move around’ would sit better under Liveable places, allowing Distinctive places to focus on the importance of protecting and enhancing the built and natural environment. There was also a perceived emphasis on managing new development, with a lack of consideration for the protection or improvement of existing places, and the opportunities they present.

Concerns were raised about how high level strategy can translate into the individual policies required for delivery, or that the delivery mechanisms are unclear. It was

also noted that delivery will depend on factors beyond the planning system's influence and will require a multi-agency, multi-sector approach. The importance of resources, including for planning departments, and of investment (particularly in relation to the remediation of vacant and derelict land), were also highlighted.

It was also suggested that more robust language, and greater consistency of wording and terminology, is needed along with more detail, more explanation and more guidance. Specifically it was suggested planners will require guidance with respect to the relative weighting of the various objectives.

Safe and pleasant, easy to move around and resource efficient

Comments on the phrase 'safe and pleasant' included that there should be greater ambition to create 'inspiring' places rather than just 'pleasant' ones. In relation to safety it was suggested that:

- Ensuring women feel safe in public spaces is very important.
- Development must not be supported in areas where it poses a risk to community safety.
- Existing businesses and operators should be protected if development encroachment occurs close to a hazard site.

While the need for ease of movement was supported, it was suggested this will be challenging and will require substantial investment. There were calls for:

- Prioritisation of active travel.
- Investment in cycling infrastructure.
- Improved public transport provision and better rural public transport in particular.

Consideration of the needs of people with mobility difficulties was also highlighted as important, with a requirement for inclusive design that relies on close engagement with access panels and other organisations representing people with disabilities.

It was suggested that there needs to be greater clarity on what is meant by 'resource efficient', and also that creating resource efficient places will require the use of circular economy principles.

Addressing past decline and inequalities

Interventions to address past decline and inequalities were welcomed, and it was observed that, at present, many multiply deprived places are not safe, pleasant or welcoming. However, it was also suggested that the draft NPF4 offers no targeted, specific interventions for places such as coalfield communities, which have experienced some of the greatest economic and environmental decline, compounded by the pandemic.

Natural environment, biodiversity and blue and green infrastructure

Respondents often supported the statement that nature recovery and connected blue and green infrastructure must be at the heart of future places. It was also argued that this infrastructure should not just be connected, but strategically planned from a local to national level across catchments. Reference to other benefits of blue and green infrastructure, beyond biodiversity value, was suggested.

It was argued that the reference to Scotland having a rich and high-quality natural environment is at odds with the later commitment to 'restore the richness of Scotland's natural environment' and that NPF4 should recognise that Scotland is a nature-depleted country. While the commitment to restore the natural environment was welcomed, it was also argued there should be greater protection in the first instance. Some respondents made the case for a National Nature Network as a means of improving biodiversity, or argued that NPF4 should reference a new National Park.

In terms of assessing biodiversity, the need for a clearer metric on how to measure net gain was highlighted.

Placemaking, a design-led approach and a focus on quality

There was support for a stronger commitment to placemaking, although it was also argued that, at present, the design-led approach and quality outcomes identified do not feed through into policy. There was also a request to clarify the definition of 'quality' – whether quality of build, quality with respect to the volume of natural assets, or in relation to community expectations.

However, it was also suggested that a design-led approach does not necessarily equate to better places and that linking placemaking and design-led approaches focused on quality is too subjective. Instead of focusing on quality as a primary outcome, it was thought preferable to have outcomes of creating places for people and a green infrastructure first approach.

Other comments on placemaking included both that the role beauty plays in people's experience and enjoyment of place should be recognised, and that landscapes must be a key consideration of placemaking.

It was also suggested that the need for new design and architecture to contribute to distinctive places could be addressed and that developers should be encouraged to focus on creating high-quality distinctive spaces rather than meeting minimum standards. There was a call for support for local authorities to refuse applications that fall short and to insist on high quality proposals. It was reported that decisions to refuse applications due to sub-standard design are often overturned at appeal.

Reshaping town centres

It was argued that part of what makes town centres distinctive is a mix of small and independent businesses, and that the improvement of local high streets requires a presumption against out-of-town development. Another perspective was that the

current 'town centre first' approach should be retained to allow for local assessment of any proposed development.

An opportunity for NPF4 to ensure that public health priorities are considered in plans for town centres was also highlighted.

Reusing vacant and derelict land and buildings

Although the principle of reusing vacant and derelict land and buildings was supported, it was suggested that, since content elsewhere in NPF4 identifies other functions for vacant and derelict land (for example in greening urban areas, or in providing nature-based solutions), support for reuse should be caveated with 'where appropriate'. It was also argued that sustainable design and sustainable use of resources must be prioritised, as referred to under Sustainable places.

Some respondents noted that the reuse of vacant and derelict land should not always be seen as a priority and it was argued that building on vacant and derelict land is not inherently 'greener'.

Creating rural opportunities

There was a view that some policies in NPF4 feel urban-centric, and that this may affect the creation of new rural opportunities. There were calls for:

- Recognition that rural areas require a more flexible and specific approach to planning policy.
- A clear approach to defining and capturing rurality in Scotland and a clearer vision for rural communities.

Our best places

There was support for the commitment to value, enhance, conserve and celebrate our best places, which was said to align with the national strategy for the historic environment 'Our Place in Time'. However, it was also suggested that there is not enough emphasis on creating 'the best places of tomorrow' and that an intention to conserve our best places might be seen as implying that other places are not worth conserving.

Concern was expressed that an emphasis will be placed on conserving places when sensitive, locally agreed and locally beneficial development could be advantageous to communities without being environmentally damaging.

Other themes

Respondents also highlighted a range of other issues they would like to see considered in relation to distinctive places. These included:

- Responding to climate change, achieving net zero and the changes this will bring.
- The importance of landscape.
- Community input to decision-making, community-led approaches, and a focus on Local Place Plans and community empowerment.

- Natural and historical heritage as a means of increasing a sense of place and belonging.
- Resilience of coastal assets.
- Heritage assets and the importance of adaptation and mitigation in relation to enhancing, valuing and conserving the historic environment.
- Consideration of Natural Capital.
- The role of culture and creativity in sustaining successful communities and places.

Question 5 – Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

Around 325 respondents made a comment at Question 5.

This included some extensive comments which addressed issues considered in more detail at Questions 1 to 4, or at subsequent questions on national planning policies. For example, many expressed a view that the spatial strategy will not deliver sustainable, liveable, productive and distinctive places without the planning system responding with robust policy and decision-making. The analysis presented below is focused on the most frequently-raised points relating to the relationship between the four spatial strategy themes, and the identification of any additional themes for inclusion in NPF4.

Most of those commenting expressed support for the spatial strategy, especially the focus on climate change and nature recovery. These respondents identified NPF4 as a key opportunity for the planning system to contribute to the change required to deliver against net zero targets, and expressed a view that the four themes around which the spatial strategy is structured provide a sound basis for doing so.

However, some suggested that the way in which the spatial strategy is communicated could be improved. This was primarily related to a perceived need for clear definitions of key concepts, including what these should mean for development planning and planning decisions. Respondents also highlighted the importance of the spatial strategy being phrased strongly enough to ensure buy-in from developers and other stakeholders.

While some supported the focus on climate change and nature recovery, others felt that the spatial strategy should go further to ensure that all development is guided by the delivery of net zero targets. Some respondents wished to see a commitment to sustainable economic growth.

There were calls for greater clarity on the connection between the four spatial strategy themes. This reflected a view that the draft NPF4 does not recognise inherent tensions between specific aspirations, for example between economic growth and net zero and nature recovery. Respondents suggested that more was needed to integrate the spatial strategy with national planning policy and other components such as the six spatial principles, the action area priorities, and the

proposed national developments. It was suggested that a detailed map of the relationships between all parts of NPF4 should be provided. Some also wished to see the National Spatial Strategy map (at page 5) include further detail on the change which the strategy is seeking to achieve.

Respondents also saw a need for further detail on the prioritisation of aspects of the spatial strategy, including how these components should be balanced in planning decisions. It was suggested that this could be addressed by the addition of an overarching guiding principle that sets out how delivery of places that are sustainable, liveable, productive and distinctive will make Scotland a net zero nation. This reflected concern that the spatial strategy lacks a single vision comparable to that included in NPF3. There was also a perceived need to ensure that interpretation of the spatial strategy does not treat the four themes separately, resulting in plans and proposals focusing only on individual aspects of place.

Concern was also expressed that the spatial strategy does not make specific reference to net zero targets. It was suggested that NPF4 would benefit from a clear roadmap to 2045, including anticipated milestones, resourcing considerations and outcomes. This was seen by some as essential in giving stakeholders confidence that the strategy will be implemented.

Some respondents expressed a view that the national spatial strategy does not do enough to respond to the variation in characteristics and needs across Scotland's regions. This included calls for the spatial strategy to differentiate between urban and rural areas, and between cities and towns. Respondents noted that this requires planning authorities to be permitted sufficient flexibility to ensure LDPs are tailored to local needs and circumstances, and to changing circumstances over the plan period.

Respondents highlighted the role of other frameworks and strategies in supporting the spatial strategy. There was thought to be a need for NPF4 to provide a clear account of the external strategies and plans which are expected to have a role to play in delivery of the national spatial strategy. In this context, respondents made specific reference to SPP, the National Marine Plan, the National Biodiversity Strategy, the Scottish Climate Change Adaptation Programme, NSET, Housing to 2040, and the Heat in Buildings Strategy. There were also calls for the spatial strategy to provide more detail on how it will guide preparation of other plans and strategies, such as Regional Spatial Strategies, LDPs and Local Place Plans.

Respondents highlighted several principles that they saw as underpinning the spatial strategy, and approaches that they wished to see better reflected. These included:

- Use of a collaborative design approach to drive improvements in the quality of development design, including user-led approaches to ensure that the delivery of the spatial strategy reflects what communities want and need. This included calls for the spatial strategy to provide clarity on the role of communities in delivery of NPF4.

- More weight being given to the adaptation of existing places, land and buildings, in line with the recommendations of the Climate Change Committee and supporting the focus on conserving and recycling assets.
- Recognising the link between climate change, health and inequality across the spatial strategy.
- Emphasising the importance of 20-minute neighbourhoods.
- Ensuring the spatial strategy is supported by a robust evidence base to guide delivery.

Some respondents also identified policy areas or themes which they wished to be given greater prominence by the spatial strategy. Specific suggestions included:

- Greater emphasis on the importance of strategic and local transport connections across the spatial strategy, recognising the requirements of a decarbonised transport sector.
- A stronger focus on the role of renewable energy as part of a just transition away from fossil fuels, and consideration of how this will be balanced with other spatial policy priorities. This included calls for the spatial strategy to specifically address the need to direct renewable energy development in a way that does not undermine nature recovery.
- A stronger focus on the importance of housing for Scotland's communities, recognising the need for sustained action in response to the current housing crisis, and including housing for older people.
- Greater emphasis on the need to protect and enhance Scotland's landscape and historic environment, including the role of landscape designations.
- Calls for a greater focus on the circular economy and embodied carbon.

Spatial principles for Scotland 2045

The draft NPF4 notes that we will need to make the right choices about where development should be located but that no single policy or development on its own will deliver sustainable, liveable, productive and distinctive places. It sets out that, in order to build a climate-conscious and nature-positive future, our strategy and the policies that support its delivery are based on six overarching principles.

Question 6 – Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

Around 380 respondents made a comment at Question 6.

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

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

- It will be essential that the principles are translated into robust policy. There need to be specific objectives and targets and NPF4 should state what should be prioritised.
- Successful delivery of the principles can only happen if there is sufficient detail and clarity in the rest of NPF4 to inform and guide planners, developers and the wider public. It is not clear how the spatial principles will be used in decision-making, especially since they are not referred to in other sections of the draft NPF. There should be better links between the spatial principles and the Universal Policies set out in Part 3.
- Parts of this section could read as an effort to influence regional planning but there is lack of clarity on how this is to be delivered. More clarity and information on investment and delivery vehicles is necessary.

Other suggestions related to a wider reframing of this section of the draft NPF and/or the spatial principles themselves. Comments included that:

- There should be a general revision to make the principles less urban-centric and more appropriate to the needs of rural Scotland.
- The approach should be place-based, with rural, island, urban, and peri-urban principles.

In terms of how this section of NPF4 could be improved, suggestions were that it should:

- Make explicit reference to the aim to make tackling climate change a 'primary guiding principles for all our plans and decisions'. It should also include some read across to the four Place themes (at Questions 1-4).
- Set out wider linkages. There could be reference to other national strategies and legislation that underpin and reinforce the principles. It was also noted that the spatial principles should contribute to other policy programmes, for example to Scotland's NSET.
- Provide guidance on how the principles will be used in the planning application decision-making process.
- Reference the Place Principle as a means of delivery of the spatial principles.
- Use precise language and include further detail or expanded definitions.

a) Compact growth

Compact growth was the spatial principle that most divided opinion.

On the one hand, some respondents supported the approach set out, including by suggesting that it will be key to sustainable development. Other reasons given for supporting compact growth included that maximising the use of existing infrastructure and buildings will offer benefits to the existing community. It was noted that this type of approach can be particularly important for some groups, such as for older people.

Some of those who were generally supportive of the approach set out noted certain issues they felt needed to be taken into account, including that the planning system will require greater powers to ensure that such an ambition can be delivered. Other comments or suggestions were that:

- Consideration should be given to the impact of land use restrictions on land values. If the direction of travel is to limit urban expansion through land use planning, it will be important to ensure that the resultant increase in land values associated with residential planning permission is democratised and perverse incentives in terms of what is built are avoided.
- The value that people place on space, including outdoor space, has been highlighted by the pandemic. Flatted living suits a sector of society, but is not a universal answer for all.
- Compact growth should not be at the expense of local greenspace for food growing and recreation.
- The significant increased space needed for energy networks within and nearby settlements will need to be recognised.

Other respondents, including a number of 'Development, Property or Land Management Company or Representative Body' respondents, raised fundamental concerns about this principle. They centred around a view that it is not always appropriate to allocate vacant and derelict land, and in particular derelict land to be

used for housing, rather than greenfield land. This was connected to the suggestion that the delivery of all-tenure housing to meet future needs across Scotland will be reliant on an appropriate blend of brownfield, vacant and derelict and greenfield land coming forward through LDPs.

Other comments related to the focus on brownfield, vacant and derelict land included that:

- While vacant and derelict land sites do contribute to the delivery of new homes, there are also examples of where use for housing simply may not be appropriate. This includes because of contamination, lack of access, remoteness or where the economic hurdles cannot be met.
- Limiting development to brownfield or vacant and derelict land sites is at odds with c) Balanced development and the intention to give people a choice about where they live, learn and work.
- Brownfield sites can be socially and environmentally important spaces and it may be inappropriate to develop biodiverse sites.

In relation to the general principle of focusing on compact growth, it was suggested that a blanket objective to increase density may be inappropriate and in some locations may be detrimental to effective placemaking and to new development achieving cohesion with the existing settlement pattern.

There was also a concern that increasing settlement density could have the unintended consequence of concentrating growth and development in existing urban places and will not support repopulation efforts in rural areas. It was also noted that compact growth is not so easy to manage in island settlements, where the development pattern is heavily influenced by land tenure, including crofting.

b) Local living

A number of the comments made about this spatial principle expressed support for the general principle, including in relation to 20-minute neighbourhoods, but noted that the 20-minute neighbourhood approach is not without its challenges.

These issues are covered in further detail at Question 29, but in summary points included that there is a need for information on how 20-minute neighbourhoods can be applied in practice, especially in rural areas. There was also a question about how the approach is expected to work in areas with established patterns of development that is supported by current and previous policy, and driven by market forces that are outwith the control of the land use planning system. It was suggested that the 20-minute neighbourhood principle needs to be considered alongside economic, social and environmental considerations.

Other comments focused on whether the 20-minute-neighbourhood concept is appropriate to rural areas, with points made including that in rural areas services are often more than a 20-minute journey away, with active or public transport travel options limited or unsuitable. There was a concern that the 20-minute neighbourhood terminology is potentially misleading in a rural context and may raise unrealistic community expectations about access to services.

In relation to other aspects of this principle, comments included that it should not be assumed that the decentralisation of energy networks will be easily delivered, and that land use planning alone will not deliver the shift to sustainable transport. There was a call for a national focus and funding to develop active travel infrastructure.

Finally, there was support for the inclusion of local circular economies as a feature of this principle, although it was noted that they are not referenced under Policy 7 (Local living). This issue is covered further at Question 29.

c) Balanced developments

A number of the comments about this spatial principle were focused on how it relates to other parts of the draft NPF, or to other planning policy. On this latter point, it was suggested that the current SPP of 'right development in the right place', should be carried through into NPF4, giving it formal status. A connected view was that it should act as a standalone principle within NPF4. Other suggestions for additional principles are set out below.

In terms of the draft NPF as it stands, it was suggested that there are a number of policies which will work against the objective of achieving balanced development, particularly in respect to the suggestion that people will have more choice over where they can live. There was specific reference to Policy 29 (Urban edges) and to the identification of Minimum All-Tenure Housing Land Requirements (MATHLR) at Annex B.

Other comments focused on the principle's reference to creating opportunities for communities in areas of decline and managing development more sustainably in areas of high demand. On the latter issue, there was a query as to how this will be achieved. In relation to creating opportunities for communities in areas of decline, views included that:

- The action areas set out do not support transformational change, particularly in coalfield communities.
- NPF4 should also cover the need to prevent negative economic impacts from loss of industry.
- There should be recognition of the impact that second homes and short-term holiday lets can have on communities, while also recognising that these can bring economic benefits in some instances.

Other comments included that:

- Balanced development in rural areas must be supported by investment in public transport. It was also suggested that equality in digital connectivity is crucial for transforming rural and island areas and promoting balanced growth.
- The aim of balanced development is to provide more choice for people about where they live, but the draft NPF fails to ensure that older people will have this opportunity.

d) Conserving and recycling assets

Most of those who commented were supportive of conserving and recycling assets, with connected points including that the retention and enhancement of assets will assist in leaving a positive legacy for communities. It was also described as key to the creation of a circular economy. Other benefits identified included that it will provide opportunities to enhance our understanding of Scotland's past and the public benefits that can be derived from the historic environment. It was reported that conserving and recycling assets is an area where Development Trusts and other community organisations are already playing an important role. There was reference to there being many examples of communities successfully improving assets, putting them to beneficial use and transforming areas that have been in decline.

One perspective was that there needs to be a presumption in favour of retaining and adapting existing buildings. However, there were also calls for a flexible approach to be taken, including by recognising that there may be instances when existing buildings cannot or should not be preserved. It was suggested that the retention of assets, and locking in of embodied carbon, should always be balanced against redevelopment being the best solution for social and economic reasons. It was also noted that, reflecting the Compact growth principle, there will be instances where redevelopment would be more appropriate to encourage higher density development.

Also, in relation to types of area, it was suggested that a focus on better enabling brownfield development and regeneration is particularly welcome for ports but that, when considering the use and reuse of infrastructure and land, it is vital to consider what is fit-for-purpose in the contemporary context. An example given was that road and rail links may not be configured for the volume or technical requirements of today's freight requirements.

In relation to the reference to including nationally significant sites for investment which are well served by existing infrastructure and sustainable travel modes, there was a concern that this risks seeing investment in locations that have already been well served, resulting in areas that have poor infrastructure becoming even poorer and more disadvantaged. It was also suggested that further clarification as to what constitutes a 'nationally significant site' should be provided, along with a consideration of what actions will be needed to unlock these development opportunities.

In terms of other issues that may need to be looked at, there was reference to:

- What is meant by the term 'embedded carbon', by what means will it be 'locked in', and how will this sequestration be maintained?
- Making the connection to Policy 8 (Infrastructure first). There was specific reference to planning for waste and resources infrastructure and ensuring key projects are enabled in line with resource efficiency and circular economy principles.

- Making the connection to policies relating to vacant and derelict land, blue-green infrastructure and sustainable travel.
- Considering issues around land banks.
- The connection to Energy Performance Certificate requirements, and the need to replace buildings that cannot be brought up to the required standard.

e) Urban and rural synergy

One view was that this principle is a little unclear, including around the need for synergy between areas that have distinct functions. It was suggested that, if the point is to synergise urban and natural, this principle could perhaps be renamed to make that clearer.

Others noted their support for improving the synergy between urban and rural areas, including welcoming efforts to bring more nature into our towns and cities. However, there was also a concern that the principle only focuses on bringing green spaces into towns and cities. It was seen as important that urban practice does not dominate this process and that there is room for distinct rural needs to be addressed.

Suggestions relating to how the focus could be expanded included to cover:

- The kinds of added value that come from locally determined planning objectives.
- Long-term maintenance and the whole life cycle approach.
- Landscape matters.
- Town centres, natural heritage housing and the historic environment.
- Links between food production and urban populations, developing local food, sustainable agriculture and a better appreciation of rural life.

f) Just transition

In addition to a call for more clarity around what is intended, respondents raised a number of issues that could support the delivery of the just transition principle. These included:

- Adding a presumption in favour of community-led development which builds significant community wealth.
- Including reference to the ability of local businesses to shape their places, and to support the transition to net zero and environmentally sustainable ways of living.
- Acknowledging the role of renewable energy generation and the requirement for large-scale renewable energy generation or energy storage, including meet energy demands created by investment to decarbonise transport infrastructure.
- Ensuring that renewable energy developments – most of which are of a scale that requires them to be determined nationally – deliver appropriate local

benefits and mitigations. There was reference to quality job creation, the use of local supply chains and investment in supporting infrastructure.

The importance of listening to local communities was also highlighted, although there was also a concern that there is nothing in the draft NPF which actually enables and empowers local people to be more able to shape their places and the transition to net zero. It was suggested that NPF4 should:

- Enshrine powers and give greater weight to local decisions by community councils and local authorities.
- Complement the existing community empowerment legislation by providing genuine participative engagement around development decisions. Instances where communities are attempting to use Asset Transfer or Community Right to Buy processes, where engagement with planning processes would be a more appropriate avenue, were said to suggest flaws in the planning system that need to be addressed.

There was also a call for further information about how the proposals for community wealth building would be applied in decision-making terms by different local authorities.

Other spatial principles

There were also a number of suggestions for further themes to be covered, potentially as additional spatial principles. These were on the theme of:

- Energy. Comments included that there should be coverage of renewable electricity generation and the role of Distributed Energy Neighbourhoods. The lack of a national approach to onshore wind energy planning was described as a significant omission. It was also suggested that the evolution of the transmission and distribution network, the roll out of electric vehicle charging points, and infrastructure to support electrified heating also need to be considered.
- Infrastructure, and especially infrastructure first. Related to the call to focus on energy, was the suggestion that an infrastructure first principle should consider the transport and energy sectors in particular. This approach was described as in line with the recommendations of the Infrastructure Commission for Scotland, which was reported as having stated that infrastructure requirements should not be detached from spatial planning or only addressed through specific policies, but rather should underpin the development of spatial strategies and be integrated with planning decisions.
- Housing. It was suggested that, given its importance, delivering more affordable housing should be included as a key principle. It was noted that housing has been recognised by the Scottish Government as a National Infrastructure Priority, but there was a concern that the draft NPF does not reflect this priority.
- Health and healthy environments. Comments included that health and creating a healthy weight environment should be one of the spatial principles, as the planning system has a key role to play in promoting and supporting

health and healthy environments. It was also suggested that having a health-focused principle would support the achievement of the other principles.

- Biodiversity. This was described as a notable omission, with the connected suggestion that there should be a commitment to protecting existing biodiversity from being damaged by development.
- Environmental carrying-capacity. The principle of working within environmental parameters of biodiversity and landscape was described as integral to the spatial principles.
- Sufficiency. There was a call for the concept of sufficiency to be included as a spatial principle: how do we use and develop simply what we need to thrive while enabling the natural world, of which we are a part, to do so too?
- Children. It was suggested that there may be some value in having a principle that relates directly to children and young people, with one option to have a principle defined as 'child-friendly'. This could articulate the need to ensure spaces are reflective of the needs of children and young people, and that their views have been considered.
- Advancing equality and eliminating discrimination. It was suggested that these requirements are not covered by the existing principles, despite it being a statutory requirement for NPF4 to contribute to their delivery.
- Community empowerment. There was a call for community empowerment and place planning to be the seventh principle. It was noted that there is some recognition of the value of participation in the just transition principle, but it was hoped that a separate principle would ensure that the wider principles are founded on good engagement and support for every community to take part.

Action areas for Scotland 2045

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

Question 7 – Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Around 300 respondents made a comment at Question 7. Most of those who commented at this question raised concerns about the proposed approach.

The analysis presented here focuses on general themes relating to the action area-related approach. Questions 8-17 cover issues raised about the specific action areas themselves. Question 18, and various questions in Part 3, set out themes or issues which respondents wished to see given greater coverage, including across the action areas.

General comments by those who agreed that the spatial strategy action areas provide a strong basis to take forward regional priority actions included that the Scottish Government's Advisory Group's Report 'Towards a Robust Wellbeing

Economy for Scotland' said that differences between regional geography and sectors need to be 'recognised, respected and championed'. It was suggested that the draft NPF does appear to have identified appropriate priorities for different parts of the country, and that the action areas are well developed, with thoughtful actions designed to drive economic and social development in a manner suited to local characteristics.

A contrasting view was that this section of the draft NPF is too simplistic, appears to be contrived and does not add to what can be delivered by NPF4. It was suggested that the action areas are new and untested. There was also a concern about how area-focused actions will be delivered in practice, particularly given that NPF4 is a national policy framework.

Relationship to Regional Spatial Strategies

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

It was suggested that the detail of the geography and characteristics of each action area needs to be better refined, including in terms of how these action areas fit with the Regional Spatial Strategies, and how Regional Spatial Strategies, and LDPs, are expected to reflect the action areas.

One understanding was that the preparation of Regional Spatial Strategies is to be informed by NPF4, with the action areas appearing to provide a starting point for the development and definition of the role of Regional Spatial Strategies. It was thought, however, that clarification through Scottish Government guidance would be useful. In particular, clarity was sought around what is expected of planning authorities and how Regional Spatial Strategies are to be developed within the action areas.

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

Relationship to Regional Transport Strategies

A similar theme was that the action areas do not coincide with either the Regional Transport Partnerships or the second Strategic Transport Projects Review (STPR2) assessment areas. A concern was that this may lead to a disconnect between the detail of NPF4 and STPR2.

Relationship to local authority areas

Another frequently-raised issue was the relationship between the action areas and local authority boundaries. It was reported, for example, that in the Local

Government, Housing and Planning Committee evidence sessions, concerns were raised about some local authorities being split between different action areas.

As an example, it was noted that the Highland Council area is included within three of the proposed action areas, with an associated concern that the multitude of geographies for planning strategies and priorities will get too complicated, which in turn will weaken the spatial strategy action areas basis for taking forward regional priority actions.

However, there was also a view that all parts of one local authority may not sit well within the same action area. For example, it was noted that North Ayrshire sits within the Central urban area, and that while this works for North Ayrshire's mainland areas, it does not relate well to the islands of Arran and Cumbrae.

Scale and coherence of the action areas

Other issues raised about the proposed action areas included that they are very broad and wide ranging and cover large geographical areas that contain places with significant differences. The connected concern was that the areas are far too geographically diverse to be coherent and have meaningful priorities.

As an example, it was noted that the Central urban area covers a vast area within the central belt of Scotland, which includes Edinburgh and Glasgow but also Loch Lomond and the Trossachs and parts of the island communities to the west. It was suggested that it is not clear how these areas benefit from a single spatial strategy, given that their needs are very different.

There was also a concern that dividing the country into action areas does not recognise the commonality and synergy that extends beyond the 'regional'.

A final observation was that the action areas appear to overlap one another in places. There was a query as to whether this is intentional, and a concern that if it is, this will cause confusion.

Focus of the action areas

As noted above, specific issues relating to priorities are covered at subsequent questions. A general observation, however, was that the main thrust of the five action areas (Innovation, Transformation, Revitalisation, Transition, and Sustainability) are likely to be relevant to other, or potentially all, areas of Scotland. It was also suggested that there is considerable repetition across many of the actions identified for the different areas.

There were also concerns about an approach which gives a theme-based title to each area. Further comments included that it is not clear what value these titles bring, including because they could give the impression that standards and principles – which should apply equally across all areas of Scotland – are somehow the only primary objective for each action area.

North and west coastal innovation

This area broadly comprises the island communities of Shetland, Orkney, the Western Isles, and parts of Highland and Argyll and Bute including the north and west mainland coastline.

Question 8 – Do you agree with this summary of challenges and opportunities for this action area?

Around 165 respondents commented at one or both of Questions 8 and 9.

General comments included that the draft NPF gives a reasonable summary of the challenges and opportunities for this action area, although cannot be comprehensive and should not be read as such.

There was also a view, however, that with such a widespread geographical area there are a lot of differences and, even where there are similarities, there are often some degrees of difference. Examples given included very different settlement patterns and that, while some areas are experiencing population decline, others are seeing their population increase.

Equally, it was suggested that many of the priorities identified extend to other action areas, and particularly to the Northern revitalisation action area. Highland Council noted that its area is included within three of the proposed action areas and contended that all three action areas have similar challenges and opportunities and require similar strategic actions to ensure they are fit-for-purpose and will deliver resilient robust local communities.

In terms of places or communities that should be included in this action area, or that should be given greater focus or priority, the following were noted:

- The challenges and opportunities identified for this action area are shared by Arran and Cumbrae, supporting their inclusion. It was reported that Brodick represents a key centre where lifeline links provide access to the islands and provide important services to the wider island of Arran.
- It is difficult to see why South Kintyre would not lie within the North and west coastal innovation action area, as opposed to the Central urban transformation.
- There is a sense that Caithness and North Sutherland, which is also in the Northern revitalisation action area, is on the periphery, with opportunities and challenges largely missed from both.

Renewables

A number of respondents commented on issues relating to the North and west being at the forefront of efforts to reach net zero emissions by 2045, and the key role that renewable energy will play in delivering that ambition. The recognition that marine and terrestrial planning coordination is important was welcomed. An

associated comment was that it will be important to examine the infrastructure needed to support renewables, including offshore renewables, in the area.

Regarding the North and west's role, it was suggested that it would be useful for NPF4 to explain the statement that this is one of the most renewable energy rich localities in Europe, and whether this is in relation to marine or terrestrial renewables and in relation to wind, wave, tidal or other technologies.

In terms of other themes or issues that respondents wished to see given greater emphasis, the following were raised:

- The potential of the ScotWind Leasing and the Innovation and Targeted Oil and Gas (INTOG) options, particularly for north of the action area. The importance of infrastructure investment being focused in the right place to exploit these opportunities was also highlighted.
- The role that key ports and harbours play in supporting renewable energy. With reference to the recent Scottish offshore wind leasing round, and initial indications suggesting a multi-billion-pound supply chain investment, it was suggested that NPF4 could give better direction around a strategic plan for ports and infrastructure to support delivery.
- In relation to Shetland being at the forefront of efforts to reach net zero, how Shetland will sit at this 'forefront' in terms of clean energy provision. Specifically, it was suggested that it needs to be clear that not only onshore wind is required.
- The opportunity to look at wave and tidal innovation on the islands, as well as local energy systems. There was reference to the benefits that such alternative energy sources would bring to the overall resilience of the energy system, as well as to the islands being strategically placed to demonstrate the role wave and tidal can play.
- The vulnerability of the region's energy system and the lack of resilience and investment in the current grid infrastructure. It was suggested that there is a strategic need for grid reinforcements to provide energy security to communities, as well as to facilitate national energy transition.

A number of respondents commented that it is also important to recognise the quality of the environment in the North and west, and the level of environmental protection that will be required. For example, it was suggested that when focusing on innovation, it should also be acknowledged that there is a need to consider:

- The appropriate location and scale of associated development.
- The potential for community projects where local benefits can be realised.

Biodiversity and natural assets

The recognition of the richness of the biodiversity of the area and protected sites was welcomed, although it was thought that the challenge of balancing the protection of nature while developing renewable energy is not fully recognised.

More widely, there was a concern that clear support for nature recovery on land and at sea is missing.

It was also suggested that the following could be referenced:

- The two UNESCO Global Geoparks (Shetland and North West Highlands) and the Wester Ross UNESCO Biosphere, all three of which exist to facilitate, generate and support sustainable development.
- The Alliance for Scotland's Rainforest, which is supporting the vital, unique, and globally important biodiverse habitat and carbon sink in Scotland's north and west.
- The risk from invasive non-native species to Scotland's islands. It was noted that any developments that could enhance pathways or create pathways for invasive non-native species to move around require careful consideration and appropriate mitigation. There was specific reference to ensuring protection of our internationally important seabird populations, and the associated nature-based tourism industry.

There was also reference to the challenges resulting from an unprecedented rise in visitor numbers over the last decade, coupled with inadequate infrastructure and a fragile ecosystem. It was suggested, for example, that there is pressure to develop tourism accommodation and services in National Scenic Areas (NSAs). There was a call for better direction on how to conserve tourism resources and support the livelihoods and culture of local communities, while managing the need for economic growth.

Climate change and infrastructure

It was considered important to highlight that island and other coastal communities could be disproportionately affected by the impacts of climate change due to sea level rise, extreme weather events and the associated impacts of coastal erosion and flooding.

There was an associated concern that there is little mention of the islands potentially requiring significant and expensive infrastructure upgrades due to climate change impacts. It was suggested that NPF4 should be supported by a policy to prioritise coastal adaptation planning, actions, infrastructure, and the associated funding and investment in these vulnerable areas.

Connectivity

Connectivity, both in relation to transport and the digital infrastructure, was an important issue for a number of respondents.

In relation to transport infrastructure, it was acknowledged that decarbonisation is important, but it was also argued that connectivity itself is of critical importance to communities, businesses and individuals in the region. How to provide and maintain reliable and accessible infrastructure that improves resilience was described as a key challenge, with future investment in lifeline transport infrastructure described as a necessity. There was particular reference to:

- Overcoming ferry capacity and reliability constraints.
- Air services and alignment with the Scottish Aviation Strategy. It was also suggested that there are opportunities for innovation in low carbon air travel, as Orkney has been established as a Sustainable Aviation Test Environment.

Overcoming barriers to better broadband installation and maintenance was also seen as key and it was suggested that there is a strategic need for high-speed digital infrastructure throughout the region to enable more opportunities to work remotely and base businesses in rural and island areas. It was reported, for example, that the expansion of the blue economy and coastal communities' ability to attract growing specialist firms is inextricably connected to Scotland's ability to offer high quality modern business services in remote areas, of which superfast broadband provision is one.

The challenges of upgrading the network to particular areas of Scotland were noted, as was the limited window to upgrade due to the nature of the build being carried out via subsea cabling. There was also reference to the need to simplify the process of securing wayleaves, and that accessing property is especially challenging in Scotland owing to the more complex nature of property ownership compared to the rest of the UK.

Housing

In relation to housing, it was seen as important to acknowledge that the challenges relate both to availability and quality, as well as to how housing interfaces with many of the other challenges set out. It was noted, for example, that a lack of housing is linked to depopulation. It was also noted that although welcome, the enhancement of housing standards impacts on the cost of delivery and could have an impact on the number of private rented sector homes.

There was support for providing greater choice and more flexible and affordable homes to support the varied needs of rural communities, and for ensuring that demand is assessed accurately.

Land and asset ownership

It was suggested that there is a missed opportunity relating to community land and asset ownership, with the associated challenge being the particularly unequal nature of land ownership in this area of Scotland. It was suggested, for example, that the reference to relatively high levels of community land ownership does not reflect landownership patterns in Highland and the Western Isles. The associated concern was that communities are unable to develop sustainably to meet their needs without access to land, leading to depopulation and lack of community wealth.

Overall, however, it was suggested that community wealth is a major asset of the North and west but is underrepresented in the draft NPF. It was reported, for example, that 75% of the Outer Hebrides is in community ownership and volunteering rates are among the highest in the UK. It was also thought that the reference to community trusts as providing small scale investment to help manage

the impacts of tourism undervalues their role; in fact it was suggested that community trusts can have a big impact and influence on social capital, enterprise, biodiversity and stewardship of the land.

Population levels

It was noted that population decline is not a blanket issue across the area, including across the islands, and there was a call for NPF4 to set out a more targeted approach and statement to reflect the diversity of demographic challenges across Scottish islands.

Overall, it was thought that population challenges deserve higher prominence and clearer actions, including around supporting a more balanced, sustainable age profile. It was suggested that this will require policies and actions to help to attract and retain more younger people, and those in the 25-49 age bracket, who are most likely to be economically active and have families.

Cost of living and employment opportunities

It was reported that the region has some of the lowest average household incomes, but highest cost of living, and that the coverage could reflect these challenges and in particular problems relating to fuel poverty. In relation to energy, it was noted that there will be significant challenges ahead for this region as the nation grapples with hikes in energy prices and supply issues. In relation to other financial challenges faced by those living in the North and west action area, there was reference to inbuilt transport costs adding a 30% surcharge to building materials in some areas.

It was accepted that, as set out in the draft NPF4, employment opportunities in some areas tend to be in the public sector, tourism and lower wage sectors. However, it was suggested that this does not reflect the diversity of job opportunities in some areas, such as Orkney, where some opportunities can be highly skilled and highly paid.

It was also noted that, while lack of economic diversification has historically inhibited in-migration to the region, the pandemic has created new ways of working and an opportunity for this area to be a destination for those working from home. It was suggested that this could be transformational as even the most remote communities can now benefit from the multiplier effects of new residents and well-paid jobs that are not dependent on the proximity of industry or service centres. Relating back to connectivity, it was suggested that universal high-speed broadband is currently a major inhibitor of this opportunity.

In terms of other types of employment opportunities, there was reference to encouraging growth in the workforce for forestry and environmental businesses.

Gaelic

It was suggested that, for areas which have a significant proportion of their population with Gaelic skills, there is a considerable opportunity around Gaelic as an economic asset. There was reference to the creative industries, tourism, heritage, and the food and drink sectors in particular.

It was also suggested that the Scottish Government should consider the extent to which NPF4 will contribute to the sustainability and development of the Gaelic language and culture.

Fisheries and aquaculture

A number of respondents made comments relating to fisheries or aquaculture. One view was that aquaculture is a major contributor to the economy and supports rural communities while enabling the achievement of net zero targets. It was noted that the west coast and islands are particularly important for both finfish and shellfish but that the only opportunity outlined is the development hub at Machrihanish. It was suggested that the opportunities for expansion in open net pen farming, and supporting innovation, should also be set out.

There was also a view that it is no longer adequate to refer to ‘finfish aquaculture’ as if it is a single activity and that NPF4 should deal separately with marine open net cage finfish farming, closed or semi-closed containment fish farming at sea, closed containment fish farms on land, and freshwater fish farming. There was a call for NPF4 to set a clearer direction as to the kind of aquaculture to be encouraged, especially to achieve its overarching aspirations for sustainable use of natural resources and supporting achievement of net zero.

Question 9 – What are your views on these strategic actions for this action area?

Four strategic actions were included for the North and west coastal innovation action area.

General comments included that there is potential for conflict between the different strategic actions proposed. Examples given were between peatland restoration targets and siting of onshore wind farms on peatland, and between nature-based tourism and other developments which may have a detrimental impact on nature.

In terms of the potential of the strategic actions, there was a hope that they can help to improve the governance and land management of natural assets for greater community and ecological benefits across the north and west region. Connected to this was a suggestion that this part of the spatial strategy could look to the developing vision and aims of emerging community collaborations such as the NorthWest2045 project.

There were also themes which respondents would have expected to see reflected in one or more of the proposed actions, or to form an action in their own right. These included:

- Community energy. It was suggested that this should be at the forefront of any discussions on carbon neutral places, and that the Scottish Government should acknowledge the life changing impacts community energy schemes, which are focused on fuel poverty, could have in this area.
- Local food production and provision. It was reported that island and coastal areas are vulnerable to food supply chain issues, so encouraging more local

food production will improve equality, wellbeing and wealth building. Sustainable and fair access to affordable healthier food was seen as supporting future resilience and broader objectives, including reduced child poverty and improved health outcomes. It was suggested that this theme would also be relevant to the other action areas.

1. Create carbon neutral coastal and island communities

In relation to the title of Action 1, it was suggested that it should refer to 'net zero' rather than 'carbon neutral coastal and island communities'. It was also suggested that the specific actions set out do not go far enough and will not in themselves create carbon neutral communities.

20-minute neighbourhoods

A number of the other comments addressed the appropriateness of the 20-minute neighbourhood concept to rural and island communities. The recognition that island and coastal communities will need a bespoke and flexible approach to the concept of 20-minute neighbourhoods was welcomed. An associated suggestion was that Action 1 should recognise explicitly that 20-minute neighbourhoods cannot practically be delivered in many rural and island areas.

Other comments included that:

- In some island areas the approach runs the risk of leading to significant further centralisation around one or two main settlements, to the further detriment of the surrounding fragile rural areas.
- It is unlikely to be suitable for 'remote rural' and 'very remote rural' crofting communities which are likely to need a radically different approach that reflects their distinct needs. It was suggested that there should be a reference to islands and coastal communities needing a bespoke and flexible approach to the concept of 20-minute neighbourhoods connectivity planning, and that this should apply across NPF4.
- It should be made clear that LDP spatial strategies will be underpinned by bespoke sustainability principles that respond to the local context.

Coastal flooding

The recognition that coastal and island communities are vulnerable to the effects of climate change, sea level rise and extreme events was welcomed, although there was a call for clarity around the specific actions to be taken at local level to minimise and mitigate these risks. It was suggested that it would be helpful to explicitly promote nature-based solutions to mitigate coastal flooding and erosion. There was also a call for a commitment to invest in 'the proactive and innovative approaches'. Other comments included that:

- There should be reference to the impacts on land use in coastal areas, for example that large areas of coast will be unsuitable for future development and land will need to be allocated to relocate essential infrastructure and services.

- Planned population growth in the North and west action area needs to carefully marry mitigating risks of increased coastal flooding and erosion arising from future climate change.
- Some areas will become uninhabitable within the lifetime of NPF4, and some communities will be become unviable. It is not clear what can be done, but recognition that this is a possible outcome of failing to tackle climate change is needed.

Local communities and services

There was support for ports and harbours being a focal point for electric vehicle charging, as well as employment, although it was also suggested that there should be a stronger statement that ports and harbours are drivers for economic growth and regeneration in coastal and island communities.

It was also suggested that issues relating to communities should be framed within a broader explanation of place and how it directly shapes health, wellbeing, and inequalities.

Affordable housing

The importance of affordable housing was highlighted by a number of respondents, with further comments including that significant additional housing is required in many rural and island areas to allow communities to sustain themselves and attract an economically active new population.

It was suggested that planning authorities will need to take a more flexible, long-term approach to where housing can and should be developed, and that the Scottish Government and other partners will need to invest in affordable housing provision through direct and flexible funding.

However, there was also a view that any housebuilding should not be to the detriment of the environment and wildlife. One perspective was that climate and environmental issues must take priority.

The acknowledgement that there are additional costs for homebuilding and development more generally in islands was welcomed. It was suggested that NPF4 should state that the quality of building and development in islands will not be compromised in response to these cost pressures, and that Government infrastructure funding needs to factor in the higher cost of building/development in island communities.

Reversing population decline

Comments included that repopulation may be required in a range of areas, so references to peripheral and fragile areas need to be removed. It was suggested that a simple statement in favour of repopulation at the strategic scale, backed up by implementable policies, is what is required. There was also a call for decisions on where to support population growth to be made with the full involvement of communities.

Other comments addressed the relationship between repopulation and other NPF4 priorities. It was suggested, for example, that rural repopulation cannot happen hand-in-hand with nature conservation or meeting net zero targets.

There were also questions as to the appropriateness or viability of reintroducing people to previously inhabited areas. It was noted that repopulating uninhabited areas will further stretch public service budgets, and that this could reduce the quality of service provision for existing communities. There was a call for existing viable communities to be supported prior to the development of projects aimed at reintroducing people to areas that are not currently inhabited. However, if this approach is taken forward, it was suggested that there should be a focus on people being economically active, as this is what is required to create sustainable communities.

2. Support the Blue and Wellbeing Economies

Collaboration and alignment of terrestrial and marine planning

There was support for the focus on collaboration and the strong alignment of terrestrial and marine planning. Associated comments included that there is a potential role for Regional Spatial Strategies, which should be acknowledged in NPF4.

Renewable energy

A number of the comments addressed the potential of renewables in the north west and included that this section would benefit from highlighting the significant marine and coastal resources and the opportunities on offer from marine renewables. It was seen as important for NPF4 to support the terrestrial development and infrastructure requirements associated with offshore renewables development and the associated supply chain opportunity. There was specific reference to the recent Scottish offshore wind leasing round, and it was reported that initial indications suggest a multi-billion-pound supply chain investment in Scotland will arise from this. There was a call for NPF4 to give better direction for a strategic plan for ports and infrastructure to deliver this.

It was also suggested that NPF4 should:

- Providing clarity around how Shetland can be at the forefront of efforts to reach net zero.
- Include Port Askaig, Islay as a key strategic site for investment associated with port infrastructure to support offshore renewables and also refer to improved grid connection for Islay to support renewables.

Finally, it was suggested that there should be a focus on keeping some energy locally, with smaller-scale community owned renewables not only helping to broaden the means to achieve net zero but allowing communities to become more resilient and address fuel poverty.

Research excellence and innovation

There was a concern that the potential for this area to be a centre of excellence for research and technology has been underplayed. It was noted, for example, that the existing centres are internationally recognised, and provide a coherent network from the southern part of the area all the way up to the Northern Isles. It was suggested that the area is in a unique position to develop new marine research and technologies, not just in relation to renewables and aquaculture, but also for blue carbon.

It was also suggested that island communities are building on a legacy of innovation, not just on the natural advantage of having significant energy resources, and that this should be recognised. Specifically, there should be reference to the European Marine Energy Centre on Orkney and the first phase of the Orkney Research and Innovation Campus having been completed.

Sea ports

Respondents agreed that ports and harbours will be important to support the development of marine renewables and the associated supply chain. There was support for the reference to seaports being a focus for investment in the blue economy and that new infrastructure and repurposing of land will help to shift activity to supporting offshore renewables.

However, it was suggested that the draft NPF does not recognise the role of all ports and harbours adequately, and that a great many ports and harbours have many roles and functions, sometimes competing and other times unique or complementary. It was noted, for example, that mainland ports act as important provisioning centres for islands, can be a central part of the industrial basis of an area, or can provide a specialist facility such as at Kishorn.

Other suggestions included that Action 2 should recognise the importance of:

- Servicing offshore wind development or the provision of low/zero carbon fuelling for shipping.
- The Minch as a maritime route and all ferry routes, for example the ferry from Mallaig to the Small Isles is not shown.
- The development of Scapa Flow as a strategic asset. It was suggested that more should be made of the opportunities that exist within Scapa Flow as a whole, rather than having a singular focus on the specific pre-determined projects that have been identified within the area.
- Stornoway as a 'key port'. It was reported that Stornoway was previously identified as a 'key port and coastal and island hub' in NPF3 and there is commitment to develop a £50 million deep water terminal in the near future to support a range of diverse industries and economic activities.

Finally, there was support for ports and harbours being focal points for electric vehicle charging, although it was noted that most people in rural areas still rely on the private car and this needs to be acknowledged. It was also noted that rapid electrification of transport in this part of Scotland, which relies predominately on

electric heating, will require onsite generation and storage to help balance the grid and manage consumer fuel costs.

Space ports

It was suggested that the reference to Space Hub Sutherland should be moved from Northern revitalisation into North and west coastal innovation, bringing all space port references together in one place. There was also a call for further emphasis on the supply chain potential, both upstream and downstream.

However, others were doubtful about whether there should be any emphasis on space ports. It was reported that they have attracted local opposition and decisions will need to take account of local concerns. There was also a concern that space port developments to date have generally not taken account of the rich biodiversity of the remote locations selected for their siting.

Food and drink

Issues raised included that:

- There is no reference to farming. It was noted, for example, that farming is Orkney's main industry and provides produce to international and national markets, as well providing a local source of food and quality produce.
- There is a focus on high value, mostly exported food and drink which does not support or encourage growing for local consumption and strengthening local food resilience.

Tourism infrastructure

Comments included that it is important to look at sustainable and active travel solutions, not simply providing infrastructure for the private car.

There were references to other tourism-related activities or facilities that should be covered, including:

- Recognising and giving equal value to Scotland's UNESCO Global Geoparks and Biospheres. It was noted that the North and west coastal innovation area contains three out of four of these territories.
- The role of venues, events, festivals and activities which celebrate traditional culture, support communities to live well, and attract visitors.

Finally, it was noted that the reference to the Rural Tourism Infrastructure Fund may need to be reconsidered, since it is designed to address inadequate infrastructure where pressure from visitors is causing problems. There was an expectation that NPF4 should be setting out a planning system that can deliver infrastructure development via planning authorities and key agencies.

3. Protect and enhance blue and green infrastructure

General issues raised included that, if NPF4 is to follow through on its commitment to building future net zero and nature positive places, it needs to be firmer in its approach to how natural and cultural assets are to be managed and protected. It

was suggested that 'protection' should be added to the reference to careful planning and managing of natural and cultural assets.

Other comments included that:

- The coastal contribution to the protection of blue green infrastructure is under-represented, and developments in other action areas, such as around blue carbon, should not undermine the positive benefits of marine and coastal habitats.
- The significant contributions and resources private landowners can bring to creating an enhanced nature network should be recognised.
- Regional Land Use Partnerships (RLUP) are already a means of delivering the action needed to deliver climate and natural capital targets, in a way that is joined up with wider economic and land use planning. Thought should be given to how any local projects would complement the RLUP pilots that are already underway.

Peatlands and woodland

Although the prioritisation of peatland restoration and woodland creation was welcomed, there was a concern about the focus on offsetting. It was noted that the Scottish Government has already committed to not using overseas credits to meet domestic emissions targets, and it was suggested that NPF4 should not go down the path of opening up large swathes of Scotland's landscape for offsetting activities.

Similarly, it was suggested that NPF4 needs to consider how peatland restoration aligns with wider energy targets and policies on onshore wind development, particularly for the region which contains a large percentage of Scotland's blanket bog habitat.

Finally, there was a concern that the richness of our remaining temperate rainforest has been overstated and that urgent investment is needed, including around tackling invasive species.

4. Strengthen resilience and decarbonise connectivity

There were few specific comments relating to this action, although the proposed 'Islands Connectivity Plan' was very much welcomed. Associated points included that:

- Its inclusion was taken to be a commitment for the Scottish Government to fund the ferry investments that are required in Orkney to ensure inter-island ferry service are up-to-date and provide communities with the same connectivity that is enjoyed by the other island groups of Scotland.
- Ferry services provide a crucial link for stores in terms of how they receive or bring in supplies, but retailers must often contend with rising ferry costs or reduced return ferry services.

The commitment to investment in ultrafast broadband and to improve mobile coverage was also strongly supported, and the acknowledgement of a need for improved grid connections, including high voltage grid cables, was welcomed.

Northern revitalisation

This area broadly includes Highland with parts of Argyll and Bute, Moray and much of the National Parks. There are links west and north to the island communities.

Question 10 – Do you agree with this summary of challenges and opportunities for this action area?

Around 170 respondents commented at one or both of Questions 10 and 11.

One perspective was that the summary is considered and comprehensive. However, there was also a view that the focus is on what can be extracted from the area, in terms of renewable energy and carbon sequestration, rather than on creating vibrant, sustainable places. An associated comment was that the development potential and opportunities are focused primarily on the urban centres and growth corridors. In contrast, it was suggested that some areas, including the more rural areas of Caithness and North Sutherland, are largely overlooked.

The appropriateness of framing the action area around revitalisation was also questioned. It was suggested, for example, that revitalisation is not the over-riding priority for the Highland area, given some significant levels of growth and economic activity. There was also a query as to whether the reference to there being a need for low skilled and low paid jobs in rural areas is as intended. There was also a concern that badging the area as 'rural' is not helpful and that the vibrancy of the area's city and communities should be acknowledged.

Also in relation to Highland, it was noted that the area covers only parts of Highland, with the Highland Council area included within three of the proposed action areas, North and west, Northern and North east.

Relationship to other action areas

A number of comments addressed the relationship between the Northern and North and west action areas. They tended to suggest that there is a great deal of crossover, in terms of both the challenges and opportunities, as well as the strategic actions required.

Some respondents proposed combining the Northern and North and west action areas, with supporting arguments including that:

- Delivery across these two action areas will require coordination among the same planning authorities, with greater alignment enabling efficient use of skills and resources.

- From a management perspective, it would be simpler to ensure that each National Park, and any future National Parks, sit wholly within one action area.

A number of local authorities commented on how their area is divided between action areas, as summarised below:

- Highland Council suggested that all three of the action areas into which it falls have similar challenges and opportunities and require similar strategic actions to ensure they will deliver resilient, robust local communities.
- Moray Council commented that the split of its area between the North and west and Northern action areas causes confusion, and it would prefer to be entirely within one or the other.
- Perth and Kinross Council noted that parts of rural Perth and Kinross are within the Central urban action area, but that the challenges, opportunities and actions set out for the Northern action area are more appropriate to Highland Perthshire.
- Stirling Council commented that the northern part of its LDP area appears to lie within Northern, but also in Central urban. They sought clarity in relation to what is proposed.

Areas to be referenced

In terms of particular areas, or area-based plans, that respondents were looking to see covered, there was reference to:

- The contribution that the NorthWest2045 area already plays, and will increasingly play in the future, in addressing national ambitions for net zero and particularly the decarbonisation of energy networks.
- The proposed Moray Firth Coastal Natural Heritage Park.
- Moray's key role in terms of defence at RAF Lossiemouth and Kinloss Barracks.
- The inward investment at the Forres Enterprise Park, along with other innovative Moray Growth Deal projects and the Elgin City Centre Masterplan. An associated point was that one of the key challenges Moray faces is to continue to develop skilled jobs and diversify the economy from being defence dependent.
- The importance of the ferry connections to Orkney between Scrabster–Stromness and Gill's Bay–St Margaret's Hope.

Regarding the reference to the Flow Country as a possible World Heritage Site, it was noted that it will remain an internationally important habitat, irrespective of whether it achieves World Heritage Site status. It was suggested that its international significance for important blanket bog habitats and species, and considerable carbon storage value, should be referenced.

Biodiversity, landscape and National Parks

There was a concern that there is a lack of detail on biodiversity priorities or actions. It was also suggested that the role of landscape in creating and sustaining thriving communities should be better reflected.

Respondents also suggested that this action area should cover how landscapes are to be safeguarded, including opportunities for protecting the extensive sense of remoteness, openness and wildness of hill ranges and coasts. It was noted that the roles of NSAs, Wild Land Areas (WLAs) and National Parks are not set out. Other comments about National Parks included that the commentary should reflect that National Parks are places for some people to live and work, play an important role in Scotland's visitor economy and have a key role in conserving and enhancing biodiversity and mitigating and adapting to climate change.

It was noted that the action area covers part of the two National Parks, a number of NSAs and significant areas of wild land and peatland that are integral to the successful delivery of nature-based solutions. Careful planning and management was seen as vital to the delivery of travel networks, renewable energy infrastructure, and digital and mobile solutions without undermining landscape quality and the gains brought by biodiversity enhancement.

Other themes or issues that respondents wished to see covered included:

- That extensive commercial planting of non-native conifers on peatland can damage the peat and prevent restoration. It was suggested that consenting and funding systems must support the aims for a net zero, nature positive future.
- Opportunities for realising the potential for native woodland expansion and peatland restoration.

Housing

In relation to housing it was suggested that, while the reference to the acceleration of housing prices is welcome, there needs to be a more cohesive planning system intervention in response. In terms of supply-related aspects that need to be considered there was reference to:

- Recent house price increases not being solely attributable to the pandemic, with a major shift in housing use towards second homes and short term holiday accommodation also in play.
- Requiring a carefully balanced approach to development planning, with a wide range of mechanisms to support urban growth alongside the long-term sustainability of rural communities.
- Providing housing for young people to remain living in areas where they grew up, along with the challenge of creating suitable housing opportunities for the ageing population.

There was also reference to the urgent need to consider the limitations of existing housing, and there was a report that private landlords are starting to leave the

sector. The connected concern was that the shortage of housing is going to worsen before it gets better.

Renewables

A frequently-raised issue was that the area's importance in relation to renewable energy, and particularly offshore wind, is underplayed. In terms of particular opportunities, there was reference to:

- The Opportunity Cromarty Firth consortium and its key projects designed to ensure Scotland capitalises on offshore wind opportunities.
- The Port of Cromarty being of national significance. It was noted that it also has substantial natural assets – peatlands and forests – that are carbon sinks.
- The ScotWind leasing round run by Crown Estate Scotland, which will catalyse a significant increase in offshore wind deployment in the northern North Sea with the grant of leases totalling ~25GW.
- The 4.5GW of offshore renewables in the recently announced INTOG Decarbonisation leasing round. It was reported that these will all be constructed off the north and east coasts, and that this will likely become Scotland's largest series of infrastructure projects in the next decade.
- Plans for a wind tower manufacturing facility at Nigg Energy Park.
- The electricity network facilities being developed in Highland, such as the major Converter Station development in Caithness, which were described as being on an internationally significant scale.

In relation to onshore wind, the current proposal to make the Flow Country a UNESCO World Heritage Site was noted, and there was a query around what such a designation would mean in terms of planning policy, particularly in relation to wind energy development. It was recommended that NPF4 should make it clear that a World Heritage Site designation would not act as a constraint to future wind energy development.

However, there was also a concern that the development of windfarms in parts of the Northern action area often involves the removal of large amounts of peat.

Other themes

Other themes or issues that respondents wished to see covered included:

- Overcoming the barriers to better broadband installation and maintenance being key to unlocking opportunities for improved access to, and use of, digital technology across this northern area of Scotland.
- The acute visitor management issues and inadequate visitor infrastructure in many known visitor hotspots, and the resulting impacts on the natural environment. It was reported that there is often a mismatch between visitor numbers and visitor infrastructure at these hotspots.
- Local community-led food growing initiatives. It was reported that these cannot reduce food miles on volunteer labour, but that community-led growing

initiatives could feed into the creation of local food jobs, for example through supported employments schemes.

- The importance of working with communities to understand their needs and ambitions for their place. It was suggested that a two-way flow of interaction, engagement and idea and knowledge sharing discussions from RLUPs down to community developed Local Place Plans, and back up the chain, will be crucial.

Question 11 – What are your views on these strategic actions for this action area?

Four strategic actions were included for the Northern revitalisation action area.

5. Strengthen networks of resilient communities

A general issue raised related to the title of this strategic action, with comments including that ‘resilience’ and ‘networks’ are difficult concepts to deliver through direct planning outcomes. Suggested alternatives included:

- Create a balanced and sustainable rural population.
- Repopulate and build climate resilience and community wealth.

In terms of locations or projects, it was suggested that the following should be referenced:

- Inverness’ role in providing regional sports facilities should be acknowledged.
- Dingwall should be added to the list of key settlements.
- Better acknowledgement of the scale and range of investments within the Inverness and Highland City-Region Deal.
- Key land use and connectivity issues, such as Bus Revolution and Housing Mix Delivery.

Flood risk and water supplies

The inclusion of water systems and drainage under this strategic action was welcomed, and it was suggested that flood risk management should feature in all the action areas.

Other comments included that:

- Innovation will be needed to secure and maintain water supplies and drainage. This will include in relation to nature-based flood risk adaptation and affordable, low-carbon, distributed heat and electricity networks.
- The emphasis could be shifted onto nature-based adaptation solutions being essential to minimising the flood risk associated with changing ecosystems, and to protecting affected communities.
- There needs to be greater consideration of water and sewerage infrastructure to support increased tourism in remote areas.

Other themes

Other themes raised in relation to this strategic action included:

- There is reference to the reuse of redundant buildings but no policy suggestions to support this approach.
- While new homes may be needed to retain local people and attract new residents, there are an increasing number of planning applications for the development of homes on land rich in biodiversity and with no consideration being given to the vital habitats at risk.

6. Stimulate green prosperity

Clarity was sought as to what is meant by a 'flexible approach to planning' helping to attract investment and the growth and diversification of businesses. It was reported that flexibility is often taken by planning authorities to mean they should give approval to projects purely on the basis of economic gain. It was suggested that the emphasis should be on a flexible approach to planning which respects the need for thriving environments and nature-based solutions.

Other comments relating to the growth and diversification of businesses included that:

- Co-location of services should be considered. An example given was placing commercial greenhouses next to wastewater treatment plants so they can benefit from nutrients and heat.
- The exclusive focus on protecting 'higher quality' agricultural land is unhelpful in reducing food miles. This definition needs to be revisited, as a lot of land in the Northern action area that is used to produce food may fall outwith this category.
- It is important to make reference to selected aquaculture opportunities in this action area, including in relation to shellfish.

Tourism

Comments relating to tourism included that the tourist assets noted are based on private car use and hence are carbon-intensive and cause known issues around congestion and air quality.

It was suggested that future approaches should:

- Focus on a sustainable transport response based on community transport provision and capability. Shared transport and enhanced public transport provision was seen as having a strong role to play in determining how these tourist destinations meet the challenges of the climate crisis.
- Place an emphasis on longer stays in base locations, including through improvements to infrastructure.
- Recognise the need for continued investment to grow support services for outdoor activities.

- Recognise that the darker skies found in rural parts of this area are a valued asset and an aspect of the high quality environment that attracts tourists.
- Consider interactions between actions and priorities in NPF4 going forward. For example the impacts of the planned Coire Glas pumped hydro electric scheme on the Great Glen Way and the National Cycling Network's Caledonia Way during its construction phase, with appropriate mitigation needing to be a priority if these routes are to act as a spine for active travel networks.

It was also suggested that the reference to improving infrastructure for tourism should be expanded to include infrastructure for communities, as tourism does not sit in isolation.

Renewable energy

The reference to a carefully planned approach to renewable energy was considered unfortunate; it was reported that this is exactly what planning authorities have tried to do over the last 20 years, but decisions have continuously been made through appeals which have now completely eroded that carefully planned approach.

There was also a concern that the text reads as if renewables, growth and transmission upgrades are external to the NPF4 spatial strategy, rather than it being a strategy helping to maximise their potential. It was suggested that this approach is fundamentally inconsistent with the Infrastructure first and Green energy policies (as set out in Part 3).

There was support for the reference to the importance of renewable energy generation for climate mitigation, and the need for the repowering and extension of existing wind farms. However, there were also calls for clarity on what approach will be followed for new wind farm proposals. It was suggested that a strategic steer, informed by sensitivity studies, would be helpful. Another perspective was that there is a need for a clear and stated presumption in favour of development of onshore wind.

With regard to offshore wind, it was suggested that the reference to the potential to increase offshore wind energy capacity should be strengthened, including through reference to Crown Estate Scotland's programme of leasing rounds, including the strategically significant ScotWind leasing round.

Other issues raised included that:

- Electricity storage systems need further consideration. There was reference to gravity mechanisms, compressed air and batteries needing to be developed.
- There is little mention of geothermal solutions, despite large scale, deep drilled distributed heating systems having been very successful in Nordic countries and in Germany.

Ports

The recognition of the role of ports was welcomed, particularly in relation to the offshore renewable sector.

With regard to low carbon hydrogen production and storage, it was suggested that the investment required is considerable, as are the technical challenges involved. It was seen as important that NPF4 reflects the changing environment of renewable energy to ensure that national planning policy remains reflective of the current position up to 2045.

It was noted that the Opportunity Cromarty Firth project is referenced, but that its national impact and significance, irrespective of whether it is awarded Greenport/Freeport status, is not recognised. Specifically, it was reported that The Crown Estate Scotland Ports Study identified the area as a frontrunner for the creation of a strategic national renewables hub. There was a concern, however, that there is also no reference to the need for projects such as Opportunity Cromarty Firth to carefully consider biodiversity and designated wildlife sites.

Finally, it was suggested that Oban should be referenced as having the potential to support offshore renewables development on the west coast.

7. Nurture nature-based solutions

A number of the comments addressed the terminology used under this strategic action. Points made included that:

- The lack of definition of the term ‘nature-based solutions’ can open up the possibility of greenwash offsetting schemes.
- The use of ‘natural capital’ is unhelpful, including because it suggests that nature is a pawn which can be used and manipulated to human advantage.

Locking in carbon

The concept of this area acting as a ‘mitigation bank’ for national climate change commitments was described as interesting, but as raising some questions about the just transition and climate equity which should be addressed in NPF4.

The assertion that the area is a net carbon sink overall was said to not be supported by official figures, and there were also some concerns about the reference to locking in carbon. These focused around allocating land for carbon capture in order to offset emissions elsewhere, with the suggestion that there is a growing trend for vast tracts of land to be used in this way.

Woodlands

Although the references to the creation and enhancement of native woodlands were supported, it was suggested that:

- Engaging local communities in the forestry planning process will be key to ensuring that forests are accessible and will provide educational and cultural benefits to those living nearby or visiting from further afield.
- There should be an emphasis on improving the resilience of woodlands through natural regeneration, rather than planting and fencing.

- There should be reference to Forestry and Land Scotland's nationally important tree nursery in Moray.
- A reference to further opportunities to process and add value to timber products locally should be added.

Although the potential of forestry, woodland creation, native woodlands and peatland restoration was noted, it was also stressed that this must not be to the detriment of existing biodiversity and wildlife.

Biodiversity and land use

Other comments also referenced the importance of considering any impact on biodiversity. For example, it was suggested that both the 'Strengthen networks of resilient communities', and 'Stimulate green prosperity' strategic actions could have huge positive impacts on biodiversity if done in the right way, but that this it is not really mentioned.

However, there was also a question about what 'resilient nature networks' will look like, and how these will be accomplished. It was suggested, for example, that climate and nature conscious approaches to deer management and the rewilding of moorland will be required.

Other suggestions were that reference could be made to:

- The significant contributions and potential of private land managers and owners.
- The importance of RLUPs.

With regard to the reference to conservation at landscape scale, there was a view that conservation as a concept is no longer the gold standard, since our ecosystems are too degraded. It was suggested that, if we want the many benefits that come from revitalised ecosystems, the need for restoration should be made explicit.

8. Strengthen resilience and decarbonise connectivity

Better connectivity was described as vital to many of the plans for the Northern action area, including delivering the action to 'strengthen networks of resilient communities', and in relation to diversifying business, including the tourism industry.

Another general observation was that a strategy for future resilience is needed and that this should take account of the changing coast as a result of climate change.

Digital

It was suggested that the barriers to better broadband connectivity should be referenced. There was a concern that the very positive reference to making use of emerging broadband technologies is not supported through the national developments.

Public transport infrastructure

It was suggested that references to a low carbon future involving transport improvements should be strengthened, and that NPF4 must include transport improvements in line with those proposed previously as a possible national development for Highland.

There was a concern that the narrative on transport focuses on road and air, and that while there is a welcome statement around the 'continued modal shift to rail', there is no explanation of how this will be achieved. It was suggested that NPF4 could be more transparent about the types of major improvement planned, including by picking up on the transport interchange and park and ride opportunities set out in the Highland Indicative Regional Spatial Strategy.

Some of the comments considered particular destinations or routes, including that:

- There needs to be greater public transport connectivity to other regions, and especially to central Scotland.
- Aside from existing reference to electrification, there could be reference to alternative traction on other rail routes in Highland and linking east. There was specific reference to rural/scenic lines, including the Far North line.
- The City of Aberdeen and surrounding areas should prioritise shared transport solutions to complement existing active travel networks.

Other comments included that:

- For journeys beyond rail, electric shuttle bus services could link people arriving at train stations to wilder, more remote destinations.
- The emphasis of active travel networks should be expanded. Such networks would not only support connectivity for local communities but would be an important component in promoting sustainable tourism.

Roads

The recognition that local communities and businesses will continue to depend on road travel was welcomed, and there were a number of comments about specific routes. These included:

- Improving the A83 also goes beyond the issue with the Rest and Be Thankful. It includes the whole route, which is a lifeline link that requires investment to be safer and more resilient to climate change.
- Clarification is required as to what is proposed for the A96 and A9.
- Resilience problems on the A82 should be recognised. It was suggested that The Great Glen should be recognised as a strategic connection route (important as a route for both road and canal transportation) and that the need for investment in A82 improvements should be included.
- The Corran Ferry should also be acknowledged and strategic connections sense-checked. For example, the ferry route from Ullapool is shown as a

strategic connection, but the A835 is not identified as a link to Inverness as part of a strategic connection network.

Other comments considered how the environmental impact of road travel could be managed. They included that:

- To complement existing physical connections, smart solutions, local mobility hubs, shared transport, demand responsive transport and active travel networks will help people to access services and employment and make low-carbon local living a more viable option.
- The provision of charging points in locations in this area will be determined by levels of utilisation and points of connection to the grid. If the minimum requirements are not present, delivery of this part of the action will not be possible. This requires further investigation to ensure that this part of the action has some possibility of success.

Other issues

Other issues raised about this strategic action included:

- Oban Airport should be identified as a hub for island communities given it serves the islands of Colonsay, Coll, Tiree and Islay.
- Wick John O'Groats Airport and the Broadford Airstrip on Skye perhaps provide opportunities for future service connections.
- Timber movement by sea is a major issue in rural areas.
- The planned space port in Sutherland is referenced but is not in the Northern revitalisation action area as it is currently drawn.

North east transition

This area broadly includes Aberdeen City and Aberdeenshire with links through Moray towards Inverness, and south towards the Tay estuary.

Question 12 – Do you agree with this summary of challenges and opportunities for this action area?

Around 165 respondents made a comment at one or both of Questions 12 and 13.

Overall focus on the action area

A general observation was that the North east action area is very much focused on the energy transition, but that there is much more to this region, and this should be recognised.

It was noted, for example, that NPF3 acknowledged the importance of life and medical sciences, food and drink and tourism. It was also reported that the investment by the UK Government and the Scottish Government in the Aberdeen City Region Deal reflects this focus on diversification. The importance of agriculture as a key industry was also highlighted, both in terms of the proportion of the labour

force working in agriculture, but also how it is embedded in heritage, culture and the landscape.

Connected to the concern that this action area is overly focused on the energy transition was a view that there is a lack of ambition, vision and understanding of the region. It was suggested, for example, that the diagram appears to represent the North east as a place that you pass through or pass by, rather than having its own opportunities and challenges.

In terms of the energy focus, it was noted that a just transition relates to every sector of the economy, and it was suggested that there are missed opportunities to look at agriculture and to consider remanufacturing and the wider circular economy as being a significant part of the future industry for the area.

Another focus that was thought to be missing was the value of natural capital within the area. It was noted that the north-east region is characterised by its rivers, a varied coastline and wildlife, and it was suggested that these factors could also be acknowledged. There was specific reference to the restoration of the degraded habitats, such as the North east lowland peatlands, and a more general call for the use of nature-based solutions.

Relationship to other action areas

As at Questions 8 and 10, it was suggested that the North west, Northern and North east action areas have similar challenges and opportunities and require similar strategic actions to ensure they will deliver resilient, robust local communities.

In relation to which areas are included in the North east action area, there was a query as to whether the City of Inverness is within its scope. It was also noted that Elgin is referenced within this area, but also in the Northern revitalisation action area.

Areas or routes to be referenced

Respondents identified a number of locations, infrastructure elements or projects they wanted to see covered, or given greater coverage. In terms of wider areas, these included that:

- There is no clear reference to the important contribution Angus can make to the transition to net zero through green energy choices. This includes the Mercury Programme, as part of Tay Cities, delivering investment to support growth industries/renewable energy developments including offshore wind, the wider hydrogen network and other opportunities connected with Zero Four, Montrose Port and Brechin.
- Moray barely features in this section with the text dominated overwhelmingly by Aberdeen and Aberdeenshire.

Respondents also highlighted current or potential transport infrastructure that they wanted to see referenced or given greater prominence. This included:

- Strategic maritime routes from Peterhead. The international sea connections from Lerwick towards Scandinavia and further north.

- Lifeline ferry connections between Aberdeen, Orkney and Shetland.
- Strategic rail opportunities, including new rail routes across the North East or Scotland in general.
- Aberdeen Rapid Transit. Current references were welcomed, but there was a call for more tangible support given that, as Scotland's third largest city, it is evident that Aberdeen needs a rapid transit system of scale.
- Aberdeen International Airport, which supports the global offshore energy sector through direct connections to both energy cities and international hub airports.
- The transport corridor from Inverness, through Moray, to Aberdeen and the upgrading of the A96 and A95.
- Bridge infrastructure in the area, which was described as one of the biggest connectivity challenges facing Aberdeenshire Council.

A general concern was that this area has received inadequate transport infrastructure investment over the long term, and that based on the draft version of this action area, this lack of investment looks set to continue.

Projects or opportunities to be referenced

In terms of existing facilities or projects there was reference to:

- Strategic transmission opportunities from Peterhead to Norway and Hull, such as North Connect.
- The role of Buckie Harbour in servicing offshore wind farms.
- The role and potential at Blackhillock sub-station.

There was also reference to the Port of Aberdeen not being included as a 'green transition zone' and to there being minimal reference to potential future strategic maritime connections, such as those which could be offered when Aberdeen Harbour South has been completed. Aberdeen Harbour is covered further at the next question.

Respondents also highlighted a number of potential projects or opportunities that could be covered. These included:

- That the Fraserburgh Masterplan could support all of the strategic actions for the North east action area, for example through increasing capacity for operations and maintenance of the windfarm infrastructure, and through the potential to return added value from the larger vessels in Scotland's fishing fleet that are currently going overseas.
- Making customs sites more important in a post-Brexit scenario. It was reported that the Port of Aberdeen, Peterhead Port and Aberdeen International Airport are responding to the call by the UK Government and Scottish Government for two Green Freeports in Scotland.
- Opportunities associated with Aberdeen Airport around decarbonising aviation and for the North East to be a centre for sustainable aviation fuel.

Energy-related projects

Although some thought that the energy transition is overly prominent in this action area, there were also suggestions for renewable-related opportunities that should be referenced or given greater coverage. These included:

- The spatial aspects of offshore wind development.
- The opportunity presented by ScotWind Leasing and INTOG. It was suggested that there should be reference to the infrastructure needs and supply chain opportunities.
- Bridging technologies, such as Carbon Capture and Storage (CCS).

It was also noted that the Energetica Corridor sustainable development zone has not been referenced, and there was a query as to whether it is still considered to be one of the major opportunities for the area.

Other themes to be covered

In terms of other themes that respondents wanted to see covered, the following were suggested:

- The biodiversity agenda. It was noted that the area includes many existing wild spaces, including parts of the Cairngorms National Park, and it was suggested that a section reflecting this would be an obvious addition.
- Housing and service responses to the area's demographic profile. It was noted that the retired population of Aberdeenshire could grow by 43% by 2043, and it was suggested that the action area would benefit from some specifics around homes and other services for this demographic.
- The important role of arable farming in relation to local food security.
- The roll out of the crofting tenure.
- Small-scale shellfish-related aquaculture opportunities.
- The importance of commercial timber production and processing.

Question 13 – What are your views on these strategic actions for this action area?

Four strategic actions were included for the North east transition action area.

9. Transition to net zero

General comments about this strategic action included that it is applicable to the whole of Scotland. In terms of how it is currently focused, concerns included that:

- It is too heavily focused on Aberdeen and the Aberdeen Harbour national development proposal. There was a call for the action to reflect the potential of the entire north-eastern coastline, especially the existing assets and potential developments within the Moray and Cromarty Firths.
- There is a lack of detail outlining how the region will transition from oil and gas to renewable energy. There needs to be a clear strategy for how a just

transition will be achieved, giving time to allow new industries to establish and provide a seamless transition.

It was suggested that the economic strategy needs to be focused on facilitating change within businesses. There was a concern, however, that while much of the supply chain will be able to transition, the oil and gas industry is incentivised towards not meeting climate commitments or achieving a just transition. As an example, it was reported that the Energy Transition Fund primarily supports reduced cost levels by reducing the number of fossil fuel-related jobs through technical innovation. Instead, there was a call for the focus to be on new non-carbon-based industries replacing the existing fossil fuel industries, rather than a transformation of those industries to being 'net zero'.

Greener energy choices

Please note that issues associated with greener energy choices are discussed in greater detail under the analysis relating to Policy 19 (Green energy).

A number of comments related to the commentary on greener energy choices. They included that to avoid ambiguity the term 'green hydrogen' should be used when referencing hydrogen produced using energy from renewable sources, such as wind power, via electrolysis. One perspective, however, was that hydrogen is a potential liability and that the suggested need for a hydrogen network would depend on a currently non-existent renewables-to-green-hydrogen strategy.

It was also suggested that the pursuit of blue hydrogen runs counter to the climate goals, and that embedding it in NPF4 for the long term is unacceptable. If support is being given to blue hydrogen production with CCS, there was a call for this to be made clear.

Other comments also focused on CCS or Carbon capture, utilisation and storage (CCUS). It was suggested that the role of CCUS as a decarbonising technology in the North east action area should be set out explicitly. Further comments included that CCUS is a necessity, not an option, when it comes to decarbonising the economy and reaching net zero. It was also reported that deployment of CCUS can deliver significant socio-economic benefits, protecting and creating jobs and providing opportunities for the establishment of new supply chains.

Other greener energy-related comments included:

- The opportunity presented by offshore wind could be expanded on. A number of ScotWind sites are located off the coast of this action area, presenting a particular infrastructure need and supply chain opportunity.
- Only hydrogen and offshore wind are mentioned in this section, with no reference given to the new, repowered or extended onshore wind projects.
- The very significant role that solar photovoltaic generation will play in the Scottish energy transition is not recognised.

Ports and harbours

General comments included that ports all along the east coast can capitalise on the opportunities that will be presented by ScotWind Leasing, particularly in relation to operation and maintenance. It was suggested that NPF4 could include recognition of this potential, and outline the need for infrastructure improvements for east coast ports so that they are able to take advantage of the ScotWind opportunity.

There were also a small number of very detailed comments relating to Aberdeen Harbour. Aberdeen Harbour is covered in further detail in the section covering national developments, but in summary points raised included that:

- The North East is a centre for the skills and expertise needed to meet Scottish climate change commitments. However, there are future risks and economic challenges if those skills and expertise are lost. Allocating and delivering the ambitions of Port of Aberdeen South and North Harbour and the Energy Transition Zone (ETZ) is time sensitive and needs focused, detailed and aligned policy at a national and local level to secure delivery.
- The recognition of potential environmental impacts arising from relocation of the harbour and new construction was welcomed by some, but it was suggested that the reference be strengthened to ensure the mitigation hierarchy is followed, as currently the implication is that impacts will just be mitigated to an acceptable level.

Other themes

Other themes that respondents wished to see covered, or given greater prominence, under this strategic action included:

- Nature recovery and natural capital. It was suggested that there is currently an infrastructure focus, but that the solutions to the nature crisis are also solutions to the climate crisis. Protecting and restoring natural habitats, peatland, rivers, grassland and native woodland needs to be a given prominence.
- Community empowerment. It was suggested that meaningful opportunities for community wealth building through community empowerment should be prioritised.
- The identification of skills gaps and opportunities to meet them. It was suggested that a partnership approach involving business, industry and education sectors will be crucial to meeting those needs. Opportunities to work with universities (including the University of the Highlands and Islands) to deliver targeted programmes of learning and vocational 'green jobs' courses should be explored.
- The material requirements of the energy transition, particularly the offshore renewable plans in this area. It was suggested that there is an opportunity to keep the high quality material from the decommissioning of oil and gas rigs in the area, and to use it to build the next generation of energy infrastructure.

10. Improve local liveability

Car dependency and growth

There was a concern that the reasons for high car ownership across this action area have been misunderstood. It was noted that a large percentage of the population live within the numerous small to medium size towns to the north and south of Aberdeen and along the Moray Firth Coast, and that they regularly commute between Inverness and Aberdeen for work, leisure and to access goods and services. An associated concern was that the national development proposal to establish an 'Aberdeen Mass Urban Transport' extending to just the city limit, is unlikely to reduce travel along the north-east corridor.

It was also noted that the examples of new communities mentioned (Chapelton, Grandhome and Countesswells) are greenfield developments that have required significant new infrastructure and generated further car travel. There was also a concern that there is a tension between the wider NPF4 policy aspiration for compact growth around cities and the proposed growth corridors in this action area. It was suggested that the expansion of these areas, while maintaining settlement character and identity, will be challenging and that collaboration with all stakeholders will be needed to ensure that successful places are delivered.

20-minute neighbourhoods and compact growth

There was a concern that 20-minute neighbourhoods are given too great an emphasis for an area which is mostly rural. Others saw the potential to limit sporadic growth and promote active travel. They noted that it will be important to understand how 20-minute neighbourhoods can be applied in a predominately rural setting. In terms of issues to be considered there was reference to:

- Assessment of the type of services that would be utilised on a regular basis, and which would bring the community together.
- Challenges associated with community facilities and services already experiencing capacity issues.
- A decline on the high street. It was suggested that we will need to look closely at our current town and city centres and adapt approaches to meet current and future needs, demands and consumer habits.

In terms of the type of development required, it was noted that higher density development on brownfield land is one option for delivering housing growth. However, it was also suggested that this needs to be balanced against a blended approach which includes greenfield release. There was a particular concern that depending on brownfield sites to deliver urban growth will exacerbate the area's housing crisis.

Water supplies

There was a request for clarification around new water supply, including how and when work will be undertaken, and how it will be funded. It was suggested that significant investment in public water supplies is required, and also that strategic

actions are needed to address the resilience of private water supplies in the area, and particularly in rural Aberdeenshire.

It was considered important that any new water systems are designed to be net zero, climate resilient and to contribute to wider placemaking, circular economy and blue-green network solutions. It was also suggested that linking new water supply and waste-water systems to the further development of natural, zero carbon waste-water treatment technology could link jobs to local liveability, through an integrated systems approach.

11. Regenerate coastal communities

Comments included that this strategic action ties in directly with the City Region Deal priorities, Aberdeenshire Council's regeneration strategy and Local Outcome Improvement Plans. It was suggested that NPF4 should acknowledge that this is a continuing focus rather than a new strand.

In taking this strategic action forward it was seen as important to:

- Acknowledge the coastal vulnerabilities to climate impacts, risks of coastal erosion, coastal inundation and storm surge, and the need for shoreline management.
- Acknowledge that the delivery of homes and infrastructure in these areas can be problematic and cannot be left solely to the market to deliver.
- Further recognise the importance of the fishing industry to the strong sense of place, heritage, and community. It was suggested that support for the fishing industry has the potential to attract significant inward investment as well as lead to job creation.
- Emphasise quality of place and the potential of green tourism. Given the opportunities for attracting tourists to the North East, it was seen as important to identify and plan for sustainable visitor infrastructure and incorporate tourism into the regeneration of coastal communities.
- Reference and support the transition of the MOD land at Fort George to non-military use, and commit appropriate public sector investment to ensure a coordinated and sustainable new use is developed and delivered for this site.

12. Decarbonise connectivity

General comments included that this strategic action reflects the RTS. However, there was also a concern that the described approach lacks an understanding of the scale of the climate crisis, as well as imagination regarding solutions. In terms of the solutions required there was reference to:

- A systems approach being required, but as yet being absent.
- The need for a strong modal shift to electrified rail.
- Improvements to active travel and public transport connectivity, with NPF4 providing more detail and clarity on how these are to be delivered.

- Opportunities relating to low emission vehicles, including greater provision of e-vehicle charging facilities and the associated infrastructure.

Other themes or issues that respondents raised included:

- There is no mention of the importance of Inverness Airport, which acts as a lifeline route to the isles, especially for access to health care and the courts system. The innovation work it is doing around new sustainable aircraft design should also be acknowledged.
- In terms of actions to improve journey times and capacity between Aberdeen and the Central Belt, it is important not to lose sight of the needs and demands of intermediate stations along the network.
- The Central urban transformation action area recognises that the development of ports on the east coast will need to take account of the potential for a substantial increase in freight and passenger traffic between Scotland and continental Europe. The potential of Peterhead should also be recognised.

Additional actions required

In addition to the four strategic actions set out, it was suggested that there should be a further action around creating a balanced and sustainable rural population.

There was also a concern that Central urban's Action 14 – Reinvent and Future Proof City Centres – does not appear to be considered applicable to Aberdeen. This was considered to be unacceptable. It was also noted that all reference to the important role of cities and city centre regeneration is located within the Central urban action area but that, as Scotland's third city, the role of the city of Aberdeen must also be recognised. There were similar but more area-wide concerns regarding the applicability of many of the Central urban strategic actions to the North east action area. An example given was the importance of strengthening connections to the rest of the UK through high speed rail connectivity.

Central urban transformation

This area broadly covers central Scotland from the Glasgow city region and the Ayrshires in the west to Edinburgh city region in the east, including the Tay cities, the Forth Valley and Loch Lomond and the Trossachs National Park.

Question 14 – Do you agree with this summary of challenges and opportunities for this action area?

Around 260 respondents commented at one or both of Questions 14 and 15.

Size and diversity of the Central urban transformation area

Although there were some broad statements of support, a number of respondents raised concerns about either the size of this action area, or the diversity of the communities and places that it covers.

In terms of size, there was a view that the Central urban action area is far too wide in its geographical spread to effectively deliver on its aims. It was noted that the area covers a significant part of Scotland, particularly in terms of population, but is also a very diverse area. It was described as an area of great contrasts: from Scotland's two largest cities, Glasgow and Edinburgh, to the Loch Lomond and the Trossachs National Park and all scales of urbanisation in between.

The associated concern was that the high level and very summarised description of such a large and populated area oversimplifies the land use challenges and opportunities facing the myriad different areas. Particular aspects of this diversity that were highlighted included that a large proportion of the area is not, in fact, urban with a number of rural towns and villages and suburban areas. Other comments included that:

- The Edinburgh and Glasgow regions dominate the content of this section, with much less detail provided for areas such as Ayrshire and Fife.
- Glasgow and Edinburgh are also very different cities, and a single strategy is therefore potentially inappropriate.

There was a particular concern that there is a strong urban focus, and that the challenges and opportunities identified, and consequently the strategic actions, are not relevant to the significant rural population, including in Perth and Kinross, Stirling, Fife, and Argyll and Bute. It was suggested that for some areas, such as the Clyde Islands and south of Argyll and Bute, their challenges and opportunities have more in common with the rest of the Highlands and Islands.

Solutions to the size and diversity challenge

Solutions proposed included that NPF4 could:

- Reflect the individual Indicative Regional Spatial Strategy geographies, identifying the key strengths, challenges and opportunities of each area and how they can support the delivery of the overall Central urban aims. It was suggested that this approach would also provide greater alignment between the NPF4 and future Regional Spatial Strategies.
- Divide the action area into a number of smaller areas. Specifically, it was suggested that the area should be split into separate action areas, aligned with the Indicative Regional Spatial Strategy geographies. It was noted that this would also allow greater alignment with other regional and sub-regional strategies.

There was also a suggestion that the action area itself, and two of the strategic actions (Accelerate urban greening and Rediscover urban coasts and waterfronts) should be re-titled to better reflect the fact that they relate to Central Scotland and not specifically to urban areas.

In terms of specific areas, there were concerns as to how well East Ayrshire, and its rural areas in particular, fits into the Central urban action area. It was suggested that the majority, or at least the southern part of East Ayrshire, would be better represented within the Southern sustainability action area. It was also seen as more

sensible for Argyll and Bute, together with the North Ayrshire islands of Arran and Cumbrae, to fall within the North and west action area.

Areas and strategic plans or relationships requiring greater coverage

There were a number of references to areas or strategic plans or relationships that should be covered, or afforded greater emphasis, under this action area. These included:

- The Forth Valley Region. It was suggested that the relationships that the Indicative Regional Spatial Strategy tried to foster have been lost, and that NPF4 does not reflect Forth Valley's more polycentric character.
- Ayrshire as a whole. It was noted that the substantial and costly infrastructure issues surrounding Ayr, Prestwick and Troon are not referenced, and that these will affect the deliverability of the Ayrshire Growth Deal. There was a concern that, if NPF4 does not recognise and address this issue, Ayrshire will be significantly disadvantaged compared to other parts of the Central urban action area.
- The Tay Estuary. It was reported that the Estuary has been recognised as a national asset. It was also suggested that when recognising the importance of the Tay Estuary, other strategic, regionally significant developments are important. There was reference to the James Hutton Institute Innovation Hub, Montrose Port, Eden Campus Energy Centre, Electric A9, Perth–The Biodiversity Capital of Scotland, and Perth Smart Energy City Programme.
- The Helensburgh and Lomond area of Argyll and Bute, particularly in relation to the off-site infrastructure and connectivity requirements necessary to support the largest single-site employment location in Scotland. This was connected to the development of HMNB Clyde, which was described as providing both significant challenges and opportunities.
- West Dunbartonshire. It was noted that limited specific reference is made to the significant opportunities and potential that exist within the area. Examples given included plans for Clydebank, Dumbarton and Alexandria town centres, the regeneration opportunity at Queens Quay, Clydebank and the plans for Esso Bowling and Carless, Old Kilpatrick.

It was also noted that the geographic description of Central urban omits reference to the area's coastline. This was described as a serious omission, since the Central Belt's coastline has been at the heart of Scotland's mercantile trade, industry, and global connectivity for centuries, continues to hold this position, and will be key to the future.

In terms of strategic relationships or plans that need to be acknowledged there was reference to:

- The Ayrshire Growth Deal, which is looking to realise Ayrshire's potential as a world-class business region for aerospace and space, energy, tourism, manufacturing, engineering industries, the blue economy, and nuclear decommissioning. It was suggested that, while the Ayrshire Growth Deal is referenced in the draft NPF, its key outputs and ambitions are not sufficiently

developed or articulated, and there is limited or no reference to key regional projects.

- The relationship between the Scottish Borders and the Edinburgh City Region, including Scottish Borders Council's role in contributing to the delivery of the Regional Prosperity Framework.
- The need for closer partnership, as demonstrated by the Metropolitan Glasgow Strategic Drainage Partnership and the Edinburgh and Lothians Strategic Drainage Partnership.

Places or projects requiring greater coverage

Places or projects that respondents wanted referenced, or given greater coverage, included:

- The ports on the Firths of Tay and Forth. It was reported that these ports perform a key role in the country's infrastructure and will be a significant contributor towards the delivery of net zero 2045. With specific reference to Montrose Port, it was reported that it is playing a major role in Britain's East Coast energy cluster, and is strongly related to delivering key strategic actions in the North east action area.
- The CoRE project, located in Cumnock.
- A planned Marine Centre at Ardrossan.
- The aerospace and space cluster around Prestwick Airport.
- The Ayrshire Engineering Park and Ayrshire Manufacturing Investment Corridor projects.
- The digital and advanced manufacturing cluster at i3.

Changes of focus or emphasis required

In addition to concerns that areas or places have not received sufficient coverage, there were also concerns about some of the coverage that has been included.

For example, it was suggested that the opening paragraphs which contrast the Glasgow and Edinburgh city regions need to be revised. The challenges facing the Glasgow City Region were not denied, but the contrast between these city regions was said to be not as pronounced as described.

The suggestion that it can be more challenging to encourage the market to deliver new homes towards the west was said to be incorrect. It was also reported that developers operating in the west of the Central Belt area are extremely concerned by the low housing numbers being forecast for the next ten years in the Clydeplan area. It was suggested that there is a clear disconnect between the numbers as currently forecast versus real demand for new homes. In summary, there was a call for a more balanced presentation of the Glasgow City Region's potential as a place for future growth, innovation, and investment.

It was also suggested that there is no explanation in spatial or geo-political terms of the emphasis on the Edinburgh City Region for population growth and enhanced development proposals, especially relating to housebuilding.

Greener and sustainable places

A number of respondents commented on the ambition to create more inclusive, greener and sustainable places, including by suggesting themes that could or should be highlighted. These included that:

- The area's landscapes and natural heritage should be recognised more strongly.
- References to the need and opportunity for nature-based solutions should be strengthened.
- Alongside mitigation, the need for adaptation and resilience should be recognised.
- The references to green areas, natural space, nature restoration and landscape-scale opportunities should be supported by an indication of scale, planned delivery mechanisms and timescales.
- Where catchment scales and regional approaches are needed to address the nature and climate emergencies, including regional nature networks and climate and coastal adaptation, this should be highlighted.
- Key actions should include decarbonising existing industry and providing the infrastructure to draw in industries that have traditionally been high emission.

A more general concern was that the focus is disappointingly on grey infrastructure rather than green and blue infrastructure, and that there should be a much stronger steer towards sustainable riparian, wetland and coastal management in response to the challenge of flooding.

It was also suggested that sea level rise needs to be considered as a strategic land use constraint. It was noted that the recent Intergovernmental Panel on Climate Change (IPCC) report has suggested that it is now a matter of when, not if, sea levels will rise. It was suggested that this needs to featuring as a major land use challenge including, for example, in relation to the development of Edinburgh's Waterfront.

In terms of solutions to flooding challenges, it was suggested that a catchment-scale approach, using nature-based solutions, can provide benefits for the health and quality of life of Scotland's urban communities, particularly where solutions seek to deliver multiple benefits, including biodiversity gain and active travel routes. It was reported that this approach can also be more cost-effective than hard engineering solutions and can create lasting jobs.

However, it was also reported that nature-based solutions will not address the severe and long-standing fluvial flooding issues that affect this part of Scotland, and which will require different solutions, some of which will need to be 'hard

engineered'. The connection was made to the role that the substantial vacant and derelict land assets in this part of Scotland can play in flood alleviation.

Other themes requiring greater emphasis

Respondents also identified a number of other themes or issues that they saw as relevant to the Central urban action area. Infrastructure and travel-related comments included:

- The opportunities for the action area should include ensuring that essential infrastructure is delivered so as to facilitate the other aspirations.
- The SEStran Strategic Active Travel Network should be referenced, as it has a key regional role to play within the National Walking, Cycling and Wheeling Network (NWCWN) national development.
- There should be a focus on public transport, which has an important role to play in connecting communities and opening up access to jobs, education and social activities.
- There is a need for national level active travel freeways, with strategic status on a par with motorways and trunk roads, linking the settlements from Tayside through the Forth Valley to the west coast settlements.

Other comments and suggestions included that there should be a focus on:

- Positive health outcomes for all. The commitment to tackling poor health outcomes in west central Scotland was welcomed, but there was a query as to why such a commitment should not apply across the Central urban area, or indeed the rest of Scotland.
- Communities in pockets of deprivation, and that are often coalfield communities. There was reference to communities in Fife, Lanarkshire, West Lothian, Mid Lothian and East Lothian. It was acknowledged that there is reference to progress in restoring and reusing areas which were historically a focus for heavy industry and mining, but it was also suggested that there is a long way to go.
- The role of town centres, both urban and rural, as an important element of regional relationships. The value of having a strong network of towns that are multi-functional, and are closely linked to their landscape setting and natural and cultural heritage, was described as regionally significant, including from a tourism perspective. The importance of maintenance and repair, and the need to ensure existing places are fit for purpose and resilient, were highlighted. It was suggested that keeping our buildings and neighbourhoods in reasonable condition should be a firm objective of NPF4.
- The role of the established tourism industry and its future potential, including in coastal areas of central Scotland. It was suggested that, while the draft NPF acknowledges the potential of urban coasts, the accessible urban fringe coasts and rural coastlines are all but ignored. It was noted that the tourism industry is a key component to local economies and job growth in such areas.

- Renewable energy generation, heating, or transportation. Given its scale and success as both an energy park and destination, it was suggested that Whitelee Windfarm should be referenced. It was described as disappointing that the Central urban action area does not set out any priorities related to renewable energy development, or the repowering of strategic-scale onshore windfarms.
- Energy security, including by placing a greater emphasis of integration of Passivhaus standards in all housing developments, and through the development of heat networks.
- Reskilling and green jobs linked to low carbon energy technology installation, peatland restoration, natural flood risk management, tackling the biodiversity crisis, and afforestation.
- Food security and food deserts. It was suggested that this will be a significant issue over the lifetime of NPF4, and that it may be appropriate to look at a ban on using prime agricultural land for development.

Question 15 – What are your views on these strategic actions for this action area?

Nine strategic actions were included for the Central urban transformation action area.

In addition to comments on the particular strategic actions, there were also some general observations about the package of strategic actions. They included that they are in line with Indicative Regional Spatial Strategies, or that the strategic actions will provide a focus for the formation of the next LDPs, as well as Regional Spatial Strategies.

However, there were also questions as to whether all of the strategic actions will be relevant to all of the areas falling under Central urban. There was also a concern that there is too much reliance on action at development proposal stage, rather than adopting a plan-led approach. An associated recommendation was to rework the proposals to align with Policy 1 (Plan-led approach to sustainable development) and a 'plan-led system'. There was also a call for greater involvement of local residents.

It was noted that realising a number of the strategic actions will require a regional and catchment-scale approach and that the role of the Regional Spatial Strategies, to spatially coordinate activities and guide delivery at scale and across authority boundaries, will be key. It was suggested that this is currently underplayed and that the Regional Spatial Strategy groupings could be shown in NPF4 and a clearer outline of their status and importance provided.

There was a concern, however, that due to the lack of delivery detail there is no apparent link between the aims of the strategic actions and their subsequent implementation. Also in relation to delivery, it was reported that the strategic actions can only be delivered if additional resources from Scottish Government are made available. There was also a call for the establishment of a national delivery vehicle.

13. Pioneer low-carbon, resilient urban living

Deliverability

The reality of creating low-carbon, resilient living in existing settlements and communities was one issue raised. There was a concern that there is insufficient recognition of established patterns of physical, transit, economic, natural, and social development, along with the scale of the challenge. It was also reported that effecting the change envisaged will require actions that are outwith the influence of the land use planning system. In terms of specific challenges, an example given was that retrofitting infrastructure to improve active travel connections depends on the availability of space, and the strength of LDPs to challenge and refuse inappropriate development.

In terms of possible solutions, it was suggested that a culture change and new approach to considering these areas will be required, as well as significant investment in both resources and infrastructure to make it happen. It was seen as important that the planning system supports a shift to more balanced development where the mix of economic, social, and environmental assets in an area support one another.

20-minute neighbourhoods

In terms of opportunities, it was suggested that the Central urban action area will be able to deliver on a network of 20-minute neighbourhoods, perhaps more so than any other action area. It was noted, for example, that many areas in Clackmannanshire already benefit from the principles of 20-minute neighbourhoods thanks to the way they evolved. However, it was also noted that some of these areas may need retrofitting of certain services.

Although one perspective was that Central urban has the benefit of physical and human scale to support more sustainable approaches to development, living and travel than other areas, there were concerns that this does not apply across the whole action area. As at other questions, its appropriateness to more rural areas was queried, and it was suggested that, while particularly applicable to Central urban, this reflects the current urban focus of the action area.

Travel, including active travel

Connected to 20-minute neighbourhoods was a concern that, while active travel is mentioned specifically, consideration of public transport is missing. It was seen as important to recognise that not all 20-minute neighbourhoods will have all the facilities, employment, education, and services that locals need. To access these and link with friends and family, people will need to travel between 20-minute neighbourhoods, distances often out of cycling or walking range. It was suggested that this is when sustainable public transport comes in, and that travel hubs and bus prioritisation options will play a key role making sure that active travel and public transport are seamlessly linked.

In relation to active travel networks, it was suggested that the Central urban action area presents an opportunity to deliver at a wider scale, improving and extending

access to country parks and National Parks, including through connections to public transport.

However, it was also reported that there remain areas, particularly outwith the cities, where the car often remains by far the most convenient, and in some instances, the only practical way of getting about. It was also noted that promoting active travel has been in planning policy for several years and yet car dominated developments are still being built. It was suggested that a fundamental re-think is required to move away from this.

Other issues

Other issues raised in connection with pioneering low-carbon, resilient urban living included:

- It is also important that the need for economic growth and job creation is acknowledged in Scotland in a broad sense, including that not all job opportunities created will be classified as 'green'.
- Investment in heat networks, energy storage and the circular economy could have positive impacts on reducing fuel poverty if done effectively. Former coalfield communities should be prioritised because they are impacted by transport poverty, rural poverty because of their location, and by the lack of choice of power supply, often being off-mains.
- The Scottish government should amend Building Standards to ensure developers primary choice is contracting full fibre in all new build properties in in this region and beyond. It was reported that better connectivity is vital to the future creation of the 20-minute neighbourhoods mentioned.

14. Reinvent and future proof city centres

The scale of the challenge associated with reinventing and future proofing city centres was acknowledged, but there was a concern that by grouping the cities and large towns together the vision and ambition may get clouded and diluted. However, advantages were also identified, including that there is great benefit in considering investment in infrastructure at this geography, including by benefiting the investment plans of infrastructure providers.

In terms of particular cities, or parts of cities, the following points were made:

- Perth. Ongoing and important work to deliver local heat and energy networks for the city, and to make Perth the 'Biodiversity Capital of Scotland', should be referenced.
- Glasgow. There should be reference to doubling the Glasgow City Centre population and transitioning the city centre into a viable and liveable neighbourhood.
- Leith Docks. There was a concern that the reference to 'industrial and cultural heritage' undermines the Dock's continued operation and contribution to the Scotland's infrastructure. The port-related development at the Port of Leith, to

support the climate change emergency, must not be undermined by placing an over-emphasis on the City's heritage.

- Aberdeen City. There was a concern, as referenced above, that Action 14 does not appear to be applicable to Aberdeen, but only to cities in the Central Belt. This was considered unacceptable.

Towns

A number of respondents commented that, while the need to support our city centres is recognised, this action should also embrace town centres. Further points included that town centres:

- Face challenges that are nationally significant in scale when aggregated.
- Are arguably less resilient, their long-term viability more under threat, and investment more difficult to attract, than as this case for cities.
- Are vital to the promotion of 20-minute neighbourhoods.

It was also noted that towns, and particularly larger towns, can be significant economic drivers and the focus of large communities, as well as being of historic and cultural value.

Other issues

Infrastructure issues raised in connection with reinventing and future proofing city centres included that:

- By weaving blue and green infrastructure into our city centres we can make them more resilient to cloudbursts and flooding, whilst improving health and wellbeing and nature recovery.
- NPF4 provides an opportunity to focus on wellbeing employers and the importance of providing facilities and greenspace for workers to be healthy and active during the working day.
- Mass transit options have an important role to play in any city transformation plan.
- Broadband connectivity, and the associated installation and maintenance access requirements for previously vacant buildings, should be a key consideration for future urban regeneration.
- Consideration should be given to the opportunities for using abandoned coal mines in heating.

Other issues raised in connection with reinventing and future proofing city centres included:

- This action underplays the wider green belt and its ability to guide development into the urban area. Reference should be made to the role of the green belt in a city region context.
- It would strengthen plans if the roles of culture and creative organisations were fully considered. The role of culture in reinventing and future proofing

city centres is varied, and includes providing both workspaces and performance areas, as well as places for communities and visitors to participate in creative activity.

15. Accelerate urban greening

There was support for the aim of urban greening, and its use to restore biodiversity in the urban realm, but also questions about the type of natural solutions being proposed. There was disappointment that the strategic action does not recognise, and give policy support for, significant investment in green and blue infrastructure or the need to take a proactive and transformational approach to coastal flood management.

In terms of the types of solutions respondents wished to see, suggestions included that true urban wild spaces will be important in addition to park space, albeit the latter remains important. It was also noted that greenspaces and infrastructure can support the wellbeing economy by providing areas for allotments, orchards, bee keeping and community growing which can link into an integrated food and growing system, as well as space for learning outdoors.

It was agreed that delivering this strategic action will require a change in approach and mindset across all stakeholders to recognise the potential opportunities. Other delivery-related comments included that:

- Planning authorities will need all stakeholders playing their part, as well as strong support from the Scottish Government, to ensure developers sign up to this agenda, understand the benefits to be realised and deliver.
- As with the other actions, significant investment in both resources and infrastructure will be necessary.
- Large-scale investment across a wide range of public sector agencies does not always result in empowered, informed and involved communities. Effective delivery mechanisms need to be established to deliver transformational change.

Finally, there was a request that the reference to the work of the Inner Forth Futures Partnership be changed to more accurately describe the role of the partnership in urban greening.

16. Rediscover urban coasts and waterfronts

General comments included that there needs to be some acknowledgement of climate change implications for urban coasts and waterfronts, including sea level rise and storm surges, along with the resources that will be available to either mitigate these or manage the consequences of not doing so.

Ports

A number of the other comments on this strategic action were focused on ports. They included that, although the role of ports around delivery of the net zero target is considered, there is little about their wider role.

In terms of issues that could be referenced, the continued need for freight handling capacity was highlighted. It was reported that recent global events, including COVID, Brexit and Russia's invasion of Ukraine, have all put pressure on established port infrastructure, with ports experiencing an increase in demand for their services. It was suggested that we must have a resilient port network, capable of accommodating the swift handling and management of cargoes, and sufficient land to support operations.

In relation to specific ports, the following points were made:

- Clyde Mission. The Clyde Mission could be linked to Govan Riverside Innovation District, River Park and other City Deal funded projects like the quay walls.
- Port of Leith. The section should set out the nature of operations at the Port of Leith, and that a master planned approach to the development of Edinburgh's Waterfront not only can, but should, take into account opportunities to facilitate the offshore energy sector and modern port operation requirements.
- Grangemouth. It was noted that opportunities for hydrogen production and CCS are referenced. This was a concern for some, including because of a view that we cannot rely on Negative Emission Technologies to meet our climate commitments. Others welcomed the reference and suggested that there are much wider applications of CCS at the site than just bioenergy hydrogen production with CCS. It was suggested that there is also the opportunity to put the CO₂ transport infrastructure in place, both to decarbonise existing operations and to support future low carbon manufacturing in the area.
- Cockenzie and Blindwells. It was reported that the area provides the opportunity to deliver environmental improvements that can help to address deprivation, but can also lead to the opportunity for significant investment and employment-generating opportunities. There was a request for the reference to Blindwells to be amended to reflect local planning processes.
- Greenock Ocean Terminal. While the reference to the opportunities for enhanced cruise facilities on the Clyde and for Greenock Ocean Terminal to act as a key gateway was welcomed, it was reported that the Ocean Terminal already serves this purpose in the west of Scotland and is set to significantly increase its capacity with a recently installed dedicated berthing key quay and a new visitor terminal/centre in development.

Facilities or themes to be covered

Respondents also highlighted a number of other facilities or themes they wanted to see covered in relation to rediscovering urban coasts and waterfronts. These included that:

- Building on the reference to the strategic location and rail connectivity of Longannet to benefit local communities around this part of the Forth, more detail could be given on the potential for extending the Stirling-Alloa-Fife rail

line along the existing route, with opportunities for new stations to serve existing and expanded settlements.

- In addition to referencing regeneration in coastal communities such as Dunoon and Rothesay, it could be noted that Helensburgh provides significant employment opportunities.
- The canal corridors of North Lanarkshire, which run through or adjacent to its urban areas, should be considered as waterfronts under Action 16. There was also reference to the Union Canal.

17. Reuse of land and buildings

Comments about the reuse of land and buildings included that while the emphasis is welcome, reuse has been a national and local planning policy position for decades but turning that policy aspiration into development, and remediating on the ground, has proved difficult in practice.

It was acknowledged that NPF4 notes the benefits of de-risking sites by taking an infrastructure first approach but there was a concern that there is no information of the means that will be made available to assist local authorities in this respect. Another note of caution was that the scale of public investment required to unlock the most problematic sites will remain a challenge and should not be underestimated.

In terms of delivery, further comments or suggestions included that:

- There is significant appetite for community-led regeneration of vacant and derelict land and buildings, and enabling more community-led activity in this area strongly aligns with the spatial principles set out in NPF4. Communities need practical and financial support to enable their ambitions.
- Planning authorities will need strong and robust enforcement powers for incidences where building and landowners do not comply and where unlawful demolition occurs.
- The aim to 'steer development away' from greenfield is not a strong enough response to the climate emergency. More incentives, investment and direct policy will be needed.
- Depending on their location, vacant and derelict sites may be ideal for providing strategic blue-green infrastructure, while providing high quality local green and blue space. This can unlock wider areas for development, although they must include blue-green infrastructure to keep surface water out of the combined sewer system and to meet future needs.

There was also a query around the intended reach of this strategic action. It was suggested that it reads as if the only vacant and derelict land is within city regions, and therefore it could be assumed that this part only relates to cities.

18. Invest in net zero housing solutions

General comments included that, given the population and densities found in the Central urban action area, the focus of significant investment in net zero housing solutions is key and presents the greatest challenge for this action area.

In terms of meeting the challenge, one broader concern was that, despite acknowledging that there will be a continuing demand for more homes, reuse and adaptation of existing building stock is not headlined as part of the solution.

Existing buildings and retrofitting

Upgrading the existing housing stock to reduce emissions was seen as more testing than meeting the requirement for new homes. It was noted that the existing housing stock will account for the significant majority of homes, but that resources and deliverability are challenging, with issues including but not limited to: market capacity; skills and labour; and availability of new technologies. Issues associated with mixed tenure and mixed-use buildings were also noted, including that they are numerous in parts of the Central urban action area.

There was a call for more clarity on how retrofit is considered in NPF4 and other planning policy. There was specific reference to more detail on planning's role in relation to energy efficiency, sustainable accessibility, zero emissions heating solutions and water management.

In terms of how the upgrading of the housing stock can be taken forward, there was reference to:

- Highlighting the role of fabric first interventions and regular maintenance of buildings.
- No longer referring to retrofitting energy efficiency measures to social housing as innovative, but rather as part of a clear direction of travel for all buildings.

Affordable net zero housing

The importance of affordable new homes was also acknowledged, although there was a query around whether the objective is about more homes being classified as affordable, or that all homes should be more affordable. It was suggested that any definition of affordable should include the cost of the climate emergency-related transitions required up to 2045. It was also suggested that new homes targets must include some indication of the energy resources required.

It was suggested that investing in net zero housing solutions will be a challenge for housebuilders and infrastructure providers and will need a step change in the way housebuilders think about their 'product'. One view was that developers will need persuading of the benefits of more sustainable nature-based solutions and how they can not only contribute to achieving net zero, but also how they can improve the health and wellbeing of a community and make their developments and the surrounding area more attractive.

Connected to this was a view that a minimum standard-based approach will not work, and that to be meaningful any approach will need to consider the whole site and beyond. It was suggested that it should not be possible for agreed natural solutions to be squeezed later down the line to improve profit margins via applications to vary conditions. It was also noted that planning authorities will require the necessary policy support to enforce these features and measures.

With reference to flooding, the recognition that net zero housing solutions require zero emission water management was welcomed, as was the catchment-scale approach. It was suggested that planners will need guidance and technical knowledge to assess how blue-green interventions can be aggregated to deliver a cumulative solution across neighbourhoods, towns and cities.

Developer contributions

A number of respondents commented on the reference to the Edinburgh and South East Scotland City Deal including a commitment from partners to put in place a regional developer contributions framework. Given the diversity of the area, there were questions about how the approach would be achieved in practice. Other queries included:

- How an effective and deliverable approach can be achieved given current approaches to developer contributions as set out in Planning Circular 3/2012?
- Specifically, whether the intended approach is competent within the current section 75 agreement framework?

It was suggested that the development of a framework is out of step with the regional planning system, which no longer has a context to allow such a document to be developed.

Other comments addressed the scale of the cross boundary transport challenges, with comments including that given the level of consented development, a clear understanding of what is reasonable and deliverable in terms of any cross-boundary developer obligations is needed. One view was that, given the scale of new development compared with the transport movements, the impact of such a levy would be minimal and would not address the challenges that all parties are looking to solve.

There was also a specific concern around how the development of a regional development contributions framework would impact on the Scottish Borders' housing market. It was reported that there are real challenges in making sites viable for development and that the consequential impacts of an additional development contribution on their deliverability will be much higher than in other areas.

Groups to consider

Finally, the importance of ensuring that housing solutions, and particularly new developments, are age and disability friendly was highlighted. It was suggested that new homes need to suit the needs of an increasingly ageing and more disabled population, with ground floor living essential for many and stairs often not being manageable. It was also suggested that residents should have access to private or

semi-private garden space to be close to nature. It was recognised that this need may challenge plans for densification, but it was suggested that it can be addressed through good design and planning.

19. Grow a wellbeing economy

General comments in relation to growing a wellbeing economy included that there has to be a recognition that providing facilities and employment for a significant population can require the use of locations that are less accessible to some sectors of the population without interventions in the provision of public transport.

It was also suggested that the reference to investment opportunities should better highlight the importance of delivering the City Deals and Regional Growth deals already in place, and should also help to steer potential future deals.

Area references

In relation to projects or plans already referenced, it was suggested that:

- For West Edinburgh, it would be appropriate to add reference to shorter and longer-term timescales, given the Proposed City Plan 2030 applies the approach of higher density, residential-led, mixed use neighbourhoods to its sites.
- It is suggested that the Ayrshire Growth Deal is aligning with Clyde Mission. North Ayrshire is referenced here but is not part of the Clyde Mission. Argyll and Bute, on the other hand, is a key part of the Clyde Mission, working alongside the Glasgow City Deal partners, and needs to be referenced as such given the inclusion of Helensburgh and Dunoon.
- The Ayrshire Growth Deal will play a major part in the growth of a wellbeing economy in East Ayrshire but is only mentioned in passing, and without recognising any of the projects that will be delivered in East Ayrshire.

There were some concerns about the reference to the Ardeer Peninsula and that it is potentially supported as a site for redevelopment of the Ayrshire coast. The area's significant value for biodiversity was highlighted and there was a call for biodiversity to be recognised and protected as part of any future plans. There was also a call for a Strategic Environmental Assessment (SEA) to be carried out ahead of the proposed large-scale development on the peninsula.

In terms of other projects that need to be referenced, or given greater prominence, the following were noted:

- The Stirling and Clackmannanshire City Region Deal should be highlighted, and in particular the investment in Scotland's International Environment Centre, and Clackmannanshire's ongoing commitment to community wealth building in an area with some of the most deprived communities in Scotland. More generally, it was noted that Forth Valley is not referenced.
- The contribution that Renfrewshire makes to the Scottish economy, and the potential opportunities for growth, need to be better reflected. It would be

useful if opportunities for growth that exist across all of the action area are identified.

Themes to be covered

Respondents also highlighted additional themes they would like to see covered under this strategic action. They included:

- That the growth of remote and local working, and the creation of hubs, may not be commercially viable in smaller communities. There was a call for creative, joined-up solutions to avoid market failure preventing such service provision.
- The contribution from social enterprises and the voluntary sector in maximising economic, social and environmental wellbeing and providing new models of working.

20. Reimagine development on the urban fringe

Comments included that the title of this strategic action should reference sustainable development.

There were also questions around what is meant by the urban fringe, and a suggestion that it seems to be being confused or conflated with distinctly recognisable rural areas, such as Loch Lomond and the Trossachs National Park. It was also reported that in East Lothian, the urban fringe is largely active and productive agricultural land, and that while some areas across the Central Belt may need reimagining, East Lothian's rural areas do not.

In terms of issues or areas that could be covered, it was noted that Glasgow's local context of housing estates on the urban fringes is not represented in the text. It was reported that they have specific challenges, including lack of fixed and reliable transportation to the urban centre, concentrations of vacant and derelict land, inter-generational community blight, limited learning and employment, poor quality local shopping and community facilities, alongside low market interest for private sector housing.

It was also suggested that consideration should be given to referring to the Clyde Muirshiel Regional Park, which straddles Inverclyde and Renfrewshire and is an important biodiversity asset.

Also in relation to identifying important assets and features for protection, as well as opportunities for enhancement and innovation, it was suggested that landscape capacity studies will have a role to play.

There was also reference to ensuring the relevant active travel infrastructure and connections are in place to provide access and to allow people to continue to access and enjoy these places. A connected point was that while there is reference to rail and active travel, there is no mention of the role that coaches can play in the development of urban fringes, especially around tourism and linking urban dwellers with more rural Scotland.

21. Improve urban accessibility

Comments included that retitling this strategic action to 'Improve urban accessibility and decarbonise connectivity' would be more consistent with net zero and the connectivity actions in other parts of Scotland.

Public transport

A number of the other comments were public transport-related and included that significant investment will be required to ensure alternatives to the private car are available, not just in Glasgow and Edinburgh, but in the other cities within the Central urban action area. It was noted that this should include a viable and reliable public transport system. Other comments were that:

- It is disappointing to see no reference to bus services. The text does not emphasise the decline in bus ridership and how this might be rectified through future interventions. It was suggested that there should be specific mention of bus prioritisation measures, including around speed and reliability.
- Mass transit developments are welcome but must be completed with a holistic approach, which takes into account the safety of other road users and facilitates the use of active travel as part of journeys by mass transit.
- Rural and island accessibility is also an issue that should be addressed in this action area.

In terms of specific transport links, comments included that:

- Glasgow Metro should be referred to as Clyde Metro and should be seen as an enhancement to, rather than a displacement of, current transport provision. It was suggested that this strategic action should reflect the importance of existing bus, rail and subway provision, alongside the need for enhancements to transport interchanges and infrastructure standards.
- Passenger rail services on the Glasgow and South Western Railway line should be improved, including double tracking, electrification and reopening railway stations such as Hurlford, Mauchline and Cumnock.
- There is no information on how the rail network in Inverclyde could also be strengthened in relation to high speed rail. It was reported that this would offer a reduction in journey times, expanding the attraction of Inverclyde for a range of purposes.

Active travel

The need for continuing investment in active travel infrastructure was also highlighted, along with the importance of the active travel infrastructure being connected to mobility hubs and public transport across the area if communities beyond the cities are to enjoy better connectivity by sustainable means.

A specific suggestion was that more could be done to improve the National Cycle Network to transition more toward a utility-based system and not just leisure.

Road travel

In relation to the road network, comments included that there should be recognition that pinch points in the strategic road network need to be addressed.

With specific reference to improving accessibility from East Ayrshire into the city region, it was reported that improvements to the A77/M77 corridor would be required and improvement of the connections between the M74 and East Ayrshire would help address the area's relative isolation from markets. It was noted that these have been identified as priority projects in the Ayrshire Indicative Regional Spatial Strategy and there was a call for them to be included under this strategic action.

Community wealth building and remote working

It was seen as important that the concept of community wealth building is properly understood and defined within NPF4, in order that it is successfully implemented.

In relation to this strategic action, it was suggested that reducing car use and vehicle emissions is an incidental rather than a core benefit of a community wealth building approach. For example, there was a query around whether the reference to opportunities for longer-term remote working implies that community wealth building approaches would reduce the requirement to commute to higher paid jobs through the creation of local fair work opportunities?

It was also noted that it will not be possible to provide all employment, secondary and further education and many other services and opportunities at a local level. To complement local living, it was seen as important to make sure that there are interventions to address the strategic trips between major centres which make up much of peoples' personal mileage.

In terms of remote working and increased local employment opportunities, it was noted that the roll out of digital infrastructure will be fundamental.

Southern sustainability

This area broadly includes Dumfries and Galloway and the Scottish Borders, with links to the Ayrshires and Glasgow city region in the west and to the Edinburgh city region in the east.

Question 16 – Do you agree with this summary of challenges and opportunities for this action area?

Around 155 respondents commented at one or both of Questions 16 and 17.

Relationship to the Indicative Regional Spatial Strategy and other plans and strategies

It was noted that the Indicative Regional Spatial Strategy for the South of Scotland summarised the challenges for the area, but that the Southern action area does not take into account the significant work and planning that has gone into the Indicative

Strategy or the South of Scotland's Regional Economic Strategy. There was an associated concern that there appear to have been omissions in terms of some of the issues and proposals that have not made it into NPF4.

Overall, the concern was that the action area is not ambitious enough and needs to better reflect the realities of the region. As part of this, the primary focus being on sustainability was questioned, including as being less proactive than the branding of other action areas. It was also noted that other action areas set out ambitions that are already present in the South's Indicative Regional Spatial Strategy.

In addition to generally making the language more proactive, it was suggested that the following opportunities should be given greater overall emphasis:

- The region's contribution to achieving net zero. It was noted that every other action area references net zero, and its omission was seen as serious, given the strengths of the South. A specific suggestion was that natural capital and renewable energy opportunities should be highlighted, and it was noted that there is also no reference to the Natural Capital Innovation Zone (NCIZ) being delivered through the Borderlands Inclusive Growth Deal.
- The economic ambitions of the region, including reference to the Borderlands Inclusive Growth Deal and the South of Scotland Regional Economic Strategies in which a number of these policies and actions are identified. There was also reference to the Edinburgh and Southeast Scotland City Region Deal and the Regional Prosperity Framework.

It was also suggested that the region's strategic role and relationship to other areas could be better articulated, with comments including:

- Suggesting that the area is linked to the Edinburgh city region underplays the fact that the entire eastern part, the Scottish Borders, actually forms an integral part of the city region. This narrative should be amended to better reflect that important connection.
- The strategic importance of the region's links to Northern Ireland to the west and England to the south, should be set out.

Wider area references and emphasis required

There were also comments about areas that are not, or are not sufficiently, referenced under the Southern action area. They included that a spatial strategy for Southern Scotland that does not include Ayrshire is incorrect and does not reflect the realities of the area. Further comments included that:

- The southern part of East Ayrshire, around the Doon Valley and Cumnock, shares similar challenges and opportunities with neighbouring Dumfries and Galloway, and relates far more to this area than to the Central Belt, which is more distant spatially and completely different in character, land use and population dynamics.
- It is disappointing that South Ayrshire is not referenced. There is also a failure to promote a joined-up approach to the sustainable, low carbon and tourism

development of the coast stretching from Stranraer into South Ayrshire and then into North Ayrshire. There was a concern that the action area seems to portray South Ayrshire as a strategic through route instead of a destination in its own right.

Comments relating to other areas were that:

- Although rural South Lanarkshire constitutes a significant part of this action area, there is no reference to the towns and villages of this part of South Lanarkshire. There are significant opportunities to utilise natural resources for power generation across this area, with wind, solar and ground source all opportunities to enable local towns and villages to become more environmentally sustainable.
- East Lothian appears to be located in this area but is not mentioned. The need to maintain the identity of East Lothian's rural communities and the surrounding high-quality countryside should be referenced, as should agriculture as an economic driver.

Projects or specific area references required

Suggestions for particular projects or areas that should be highlighted included:

- The Galloway and Southern Ayrshire UNESCO Biosphere, which encourages development to demonstrate innovative approaches to sustainable communities and economies and supports the enhancement, understanding and enjoyment of the area as a world class environment. It was suggested that NPF4 should give recognition to the role and value of the UNESCO Biosphere designation, in a similar way to how other UNESCO designations are reflected within the draft NPF4.
- The Gold Tier Dark Sky Park and the Merrick Wild Land area in the Galloway Hills. It was suggested that, along with the Biosphere, these designations reflect the national and international significance of the region's natural capital.
- The potential to develop Logan, the regional garden of the Royal Botanic Garden Edinburgh, as a delivery and outreach hub for the region, supporting sustainable development and resilience in the southwest.
- The application for National Park status by people in Galloway, including that this could be a useful tool to increase economic activity that is in sympathy with the environment.
- The bid which has been submitted for Dumfries to be recognised as a city. It was suggested that, if successful, this could help the wider region to promote its world class green spaces, such as the UNESCO Galloway and Southern Ayrshire Biosphere.

Themes to be given greater emphasis

Respondents also highlighted a number of themes that they wished to see emphasised, or given greater emphasis, in relation to this action area.

Natural capital

The region's high natural capital value, and the importance of land management being sustainable and of multi benefit, was also highlighted. The example given was around the carbon dynamics of afforested peatlands and making it an absolute priority for southern Scotland to ensure intensive land use does not undermine achieving net zero or accelerate biodiversity decline. It was also noted that there is no overall reference to the sustainability of agriculture and forestry.

Housing

Providing the required number and range of homes that people need and can afford was also considered to have received insufficient emphasis. There was a concern that the difficult housing markets in some parts of the region have not been recognised and it was suggested that pressure is currently disadvantaging both employers and those wishing to relocate to the region.

Other housing-related points raised were that:

- It is important to create suitable housing opportunities for the ageing population.
- It will be vital to ensure there are adequate housing offers available to retain and attract a younger, working population.
- Second homes are an increasing issue, particularly in some towns and villages, with younger people and those on low incomes being priced out of the market. NPF4 could be used to address the balance between the visitor economy and the residential one, and could support a fairer economy through affordable provision at a time of an escalating housing market.

Flood risk

It was noted that, although there is a mention of creating places resilient to flood risk, there is no mention of dealing with existing surface water flooding risk through new development or retrofit within existing developments.

Onshore wind

Comments included that the importance of the onshore wind sector, both in economic and renewable energy generation terms, needs to be emphasised. In particular, it was noted that there is no reference to the impact of Eskdalemuir Seismic Array on renewable energy development in this area. It was also noted that there is no acknowledgement that, within the lifetime of NPF4, a substantial programme of repowering will be needed across this action area if Scotland is to achieve its net zero target.

Transport

A general point was that the transport challenges in the area would be better aligned if reference were made to the RTS. Other transport-related comments included that:

- The summary glosses over the weakness of the public transport network in the region, particularly for intra-regional journeys.
- There is a lack of any rail connections westwards from Dumfries, or any proper bus connections between Dumfries and Galloway and the Borders.
- Although the region has untapped potential for active travel for short journeys, and even some longer ones, realistically there will need to be much more emphasis on buses and rail if development in this area is not going to drive up unsustainable trips.

Access to affordable food

It was reported that one of the major challenges in some of the region's villages is around accessing good quality food, and particularly fresh food, at an affordable price. It was also reported that there are several places that are classified as food deserts.

Outdoor recreation and tourism

It was suggested that the importance of outdoor recreation and tourism to the region, for walking and cycling in particular, and including Scotland's Great Trails, should be emphasised and there should be an aspiration to become a centre of excellence for this sector.

Question 17 – What are your views on these strategic actions for this action area?

Four strategic actions were included for the Southern sustainability action area.

General comments included that the focus of the actions is too narrow and prioritises sustainability over other aims and ambitions for the region. Other comments included that the strategic actions could be more ambitious, particularly around improving wellbeing amongst relatively deprived communities, by prioritising access to nature.

In terms of additional strategic actions, it was suggested that there should be an action on growing the working population. It was reported that there are significant population issues facing the South of Scotland, and ways of developing the growing opportunity of the region as a place for younger people to come and live and work would be a helpful focus. A similar suggestion was for an action around creating a balanced and sustainable rural population.

22. Create a low-carbon network of towns

Comments about creating a low carbon network of towns included that there is no mention of communities being actively involved in planning their future, which is one of the aims of the Indicative Regional Spatial Strategy for the South of Scotland.

It was also suggested that the draft NPF is very light on ambitions for settlements to be vibrant and diverse. It was noted, for example, that there is no reference to the creation of links between housing supply and economic development growth, and it

was also suggested that the coverage on the repurposing and reinvention of town centres lacks positivity.

Another perspective, however, was that this strategic action is in line with East Ayrshire's aspirations and is supported by the Ayrshire Growth Deal through the CoRE project, which will transform Cumnock into a prototype self-sufficient, low-carbon town, with a locally distributed grid.

Other area-focused comments included that, other than Stranraer, all the suggested low-carbon towns are in the east of the region. It was suggested that Galloway's market towns and villages have similar aspirations but need support to achieve this. It was also noted that many are already working with the Biosphere to become Biosphere Communities, with a focus on delivering new sustainability initiatives, development of community resilience and promotion as destinations in the UNESCO Biosphere.

20-minute neighbourhood

One of the themes covered in relation to the 20-minute neighbourhood approach was its applicability to the southern, and particularly southern rural, context. It was noted that the strategic action appears to acknowledge that a tailored approach is required, but also that it does not go into detail about how that is to be achieved in practice. As at other questions, it was suggested that further guidance will be required as to how the approach would work in a rural area.

A different perspective was that acknowledging that a low-carbon network will have to rely on a tailored response to the 20-minute neighbourhood concept amounts to a recognition that the concept has little relevance outside individual towns themselves, and that it is not possible within each town to provide for all needs and services. There was also a note of caution that settlement expansion becomes Edinburgh commuter territory, counter to the 20-minute neighbourhood concept.

In terms of how the 20-minute approach could be delivered, there was a view that the existing network of towns in the south of Scotland present a good opportunity for future growth. It was reported that there are already strongly identified local centres, and that these would be ideal candidates for implementing 20-minute neighbourhoods. There was also reference to including service hubs in key locations with good public transport links. It was suggested that Demand Responsive Transport will be important in meeting travel needs where there are no conventional services.

It was also suggested that the development of community hubs in smaller communities could be highlighted. There was reference to the successful Humber Hub in East Lothian as an example of the connection between rural hubs, economic activity and the concept of the 20-minute neighbourhood as it applies to rural areas.

Transport

A number of other comments also considered travel-related issues. They included that there should be reference to the STPR2 recommendations and the aims of the route map to achieve 20% reduction in car kilometres by 2030. However, it was

also suggested that car use will, inevitably, be higher in rural areas where there is a lack of range and choice of public transport connections or local services.

In relation to active travel, it was suggested that it is unrealistic to apply city strategies and that wheeling, walking and cycling between towns is going to be an option for only a tiny proportion of residents and businesses.

Suggestions around achieving reduced car use included that:

- There needs to be a strong commitment to integrated public transport, especially better bus and rail connections across the region.
- The introduction of new homes can assist with the overall sustainability of a rural place by helping to sustain and grow local services and create greater economic justification for the funding of public transport.
- There is a pressing need to develop a 'Central Borders Transport Network', based on sustainable principles of reducing private car use by providing better and more convenient alternatives for travel between towns in the Network. Such a network would then provide a more extensive range of development opportunities, as well as greatly improving residents' access to employment, leisure and learning opportunities.

There was also a call for greater reference to the potential for the extension of the Borders Railway and the feasibility work that is already committed. It was suggested that it is difficult to think of a more important infrastructure proposal in terms of achieving the aims of NPF4 at a local, regional and national level.

It was also suggested that the Ayr-Stranraer railway line should be referenced, and that it has the potential to reduce car journeys and support cycle and walking tourism in the south-west of Scotland if the service is supported and improved.

Flooding and blue green infrastructure

In terms of delivering this strategic action more widely, it was suggested that planned and coordinated measures to build resilience to climate change, including flood risk management in key settlements, will be required.

However, there was also a concern that there is very little reference to the need for blue-green infrastructure and other climate adaptation actions, which was seen as surprising given the flooding challenges experienced by towns across the South of Scotland. It was suggested that there is a missed opportunity to highlight the links between flood mitigation and blue-green infrastructure and learn from the implementation of the Central Scotland Green Network (CSGN).

23. Support sustainable development

General comments included that the focus on supporting sustainable development aligns with East Ayrshire's aspiration, through the Ayrshire Growth Deal, of focusing investment on strategic growth corridors. Should East Ayrshire be included in the Southern action area, it was suggested that the Ayrshire Manufacturing Investment Corridor and the Ayrshire Engineering Park should be referenced.

It was also suggested that the UNESCO Biosphere designation, with its primary focus on sustainable development, should be highlighted within this section. It was reported that the Biosphere team work extensively with local communities and that almost 200 local businesses are signed up to their sustainability charter, supporting a transition to a more sustainable way of life.

High quality, green jobs

While job creation was seen as important, it was also thought that the importance of existing economic activity, including farming, should be acknowledged. In relation to the creation of jobs, it was suggested that they do not all have to be 'green'.

The importance of the digital economy in supporting job creation was highlighted. It was suggested that improvements in digital connectivity could be a catalyst to making the region a more competitive place to work and live, which in turn would assist in meeting the objectives around employment opportunities and retention of young people. A connected suggestion was that, as with all opportunities to invest in specific activities, consideration should be given to the local training and employment opportunities that would be part of this process.

Renewables

In terms of other job creation opportunities, there was reference to the region's untapped potential to become a centre of excellence for manufacture, research and development for the renewables industry. In particular, it was suggested that Eyemouth's role in supporting the offshore renewables sector should be referenced, and the Blue Economy delineation that appears along the entire coast of Scotland extended down the eastern seaboard of the Southern region.

Recreation and tourism

The potential of recreation and tourism was also highlighted, including through reference to the Galloway and Southern Ayrshire UNESCO Biosphere and proposed National Park.

Given the natural assets in the area, the aspiration to become a prime destination for outdoor recreation and green tourism was supported. However, it was noted that green tourism comes with its own challenges, and there was a call for serious thought to be given to how any negative effects caused by an increase in visitors to the area will be mitigated.

Higher and further education

It was reported that there is currently great interest in moving forward a proposal to establish a new medical school at the Crichton Campus in Dumfries, potentially a hub and spoke model with Glasgow University medical school being the hub and NHS Dumfries and Galloway being the partner. It was suggested that this proposal would help people from across the South of Scotland region's areas of multiple deprivation access medical training.

However, a general observation was that while this strategic action highlights the importance of higher and further education institutions in the region for retaining

young people, it omits to discuss the near impossibility for getting to them by public transport in time to start a working day.

24. Innovate to sustain and enhance natural capital

A general concern was that this strategic action does not really cover prospects for working on nature restoration at a landscape-scale across the south of Scotland, including promoting corridors for species and habitat recovery.

In terms of issues or approaches that should be covered, there was again reference to the UNESCO Biosphere and its key focus on delivery of ecosystem services. It was reported that it is a delivery partner for the Borderlands Natural Capital Programme, with an initiative focused on realising wider public benefits through working with the farming community.

Forests and woodland

Although it was agreed that the forests and woodlands in the south of Scotland are of national significance, there were some concerns about their depiction as assets. It was considered vital that forestry, and other intensive land uses in this region, do not increase greenhouse gas emissions and there was particular reference to the significant areas of afforested deep peats in Dumfries and Galloway.

It was suggested that any forestry expansion should in all cases be multifunctional and take the form of diverse, resilient forests that take into account a sense of place and offer enhanced recreation for everyone. Other comments included that:

- There could be more precision in differentiating woodland types and land use priorities according to types. Native woodland and habitat restoration or improvement is needed throughout the region to redress the region's natural ecological balance.
- We should strive to plant trees that will not disturb soil carbon and that will have a 50+ year carbon lock up after harvest. This should apply to private as well as public forests.
- The need for resilience against future disease, and issues like increased potential for fires and windthrow should be considered.
- Without effective engagement with both local communities and communities of interest, these forests can become a huge block on public access and enjoyment of the area. The importance of consultation and engagement with communities of both place and interest before planning the creation of new woodlands was stressed.

The reference to rewilding on the Carrifran model was welcomed, although there was a call for more specific guidance on which land should be rewilded and how this should be done.

Rural land use and the Regional Land Use Pilot

Other comments addressed land use more widely and included that planning authorities and RLUPs should have a mechanism for assessing development and changes in land use against climate and biodiversity ambitions. It was also

suggested that projects and initiatives, including the Borderlands Natural Capital Programme and the South of Scotland Regional Land Use Pilot, will need to work together with partners and different sectors to restore biodiversity and to maximise natural capital opportunities. It was suggested that a National Nature Network would be a way of bringing projects such as these together in a clear framework.

With specific reference to the South of Scotland Regional Land Use Pilot, one perspective was that it appears to have ended up as a way of talking about, rather than tackling, issues and has been under-funded and under-resourced for tackling the very complex issue of conflicting land use needs and wishes. To work going forward, it was suggested that more funding and a bottom-up approach will be required.

Renewable energy

It was noted that references to existing renewable energy developments are limited to Chapelcross, and there were suggestions that other projects, including the work of East Ayrshire's CoRE project, could be included.

A number of other comments welcomed the recognition that proposals for consolidating and extending existing wind farms, and associated grid improvements, will require a carefully planned approach. As part of that approach, it was suggested that NPF4 should place greater emphasis on balancing the renewable energy generation necessary for reducing carbon emissions with the protection of landscapes that provide a number of benefits to human and natural health, including as vital carbon sinks.

For example, it was reported that Policy 19 (Green energy) and Policy 33 (Peat and carbon rich soils) do not set out requirements for LDPs to have a carefully planned approach, with the requirement for spatial frameworks for onshore wind having been removed and no strategic approach to avoid peatland damage being proposed.

Other comments focused on meeting the need for increased renewable energy generation. They included that:

- The text makes no mention of repowering or the need for new sites or co-location of different renewable energy technologies.
- The reference to consolidating existing wind farm sites is unclear, impractical and inappropriate. It was suggested that responding effectively to the climate emergency requires increased, rather than simply consolidated, renewable energy generation capacity through repowering, life extensions and new development on appropriate sites.

The recognition that any renewable energy development in the Solway Firth would require careful planning was welcomed. However, there was a concern that the Solway Firth is a vital habitat for many species of wildlife, birdlife and plantlife and should not be put at risk without extensive scientific evidence to understand the implications of any development. It was suggested that NPF4 policies need to ensure that the sensitivity of the environment, and its international importance for

nature conservation, are given weight in the decision-making process. This was connected to Policy 3 (Nature crisis) and Policy 32 (Natural places).

Also in connection to the Solway Firth, it was reported that Crown Estate Scotland is funding a post with the Solway Firth Partnership to develop a business case for the Borderlands Growth Deal looking at marine natural capital opportunities in the Solway Firth. It was suggested that support for innovative natural capital approaches in this action area would help bolster the business case necessary to unlock this funding opportunity.

25. Strengthen resilience and decarbonise connectivity

General comments included that the need for improved transport connectivity beyond the borders of the Southern action area is clearly identified in the draft RTS.

Rail

In terms of issues or themes that require greater coverage, there was particular reference to the potential for the extension of the Borders Railway and the feasibility work that is already committed and funded through the Borderlands Growth Deal. It was suggested that the extension is fundamental to creating stronger economies, attracting investment and increasing connectivity for more remote communities. However, there was a concern that concentrating development around the existing Borders Railway, without expanding other rail links, will lock in regional inequality.

Other rail-related comments included:

- There is nothing specific around better connectivity between the Scottish Borders and Dumfries and Galloway.
- There is a real opportunity to consider how NPF4 could support the Stranraer and Nithsdale rail lines by creating, new stations and improving the frequency of connections. This could benefit commuters and provide an alternative option for freight/timber transportation.
- The opportunity that cross border collaborations with Northumberland and Cumbria could bring to the area is underplayed. For example, more emphasis should be placed on the future potential of approaches such as extending Borders Rail to Carlisle and improving and developing passenger rail and freight facilities.

Public transport

The suggestion that further work needs to be undertaken to build the case for improvements to public transport routes was seen as disappointing. Other comments included that it suggests a lack of commitment to improving the shortcomings of the existing infrastructure and service provision, including around east-west connections.

Given the importance of buses (in the absence of rail across large parts of the region) it was suggested that there needs to be greater consideration of how they interact with active travel modes, especially for those using cycles and mobility

aids. There was also a call for urgently-needed sustainable transport investment. A connected point was that any development should be used to drive the delivery of infrastructure, and cannot just rely on existing developments such as the Borders Railway.

Digital connectivity

It was also suggested that the reference to digital connectivity could be expanded as it has significant potential to make the region a more competitive place to live and work. Further comments included that:

- Longer distance commuter travel demand can be reduced with good digital connectivity, and this should be given greater emphasis.
- Digital infrastructure improvements must be prioritised. Not only will improved digital connectivity unlock rural living for home and hub working, but it will contribute to the growth of digital learning opportunities, improve the digital economy, and will deliver the strategic drivers of the Borderlands Inclusive Growth Deal.

Overall views

Question 18 – What are your overall views on this proposed national spatial strategy?

Around 280 respondents made a comment at Question 18. Many of these comments referred back to issues raised in relation to one of the action areas and to the analysis at the previous questions.

General comments included offers of support, or support in principle, for the aims of the proposed national spatial strategy. Further observations included that it is coherent, logical and well-presented. The structure of the draft NPF was also welcomed, and it was said to flow well, with the national spatial strategy to the front, followed by national developments and then the National Planning Policy Handbook. It was also suggested that the spatial strategy will be a useful guide to the preparation of Regional Spatial Strategies, LDPs and Local Place Plans.

In terms of particular themes that respondents were pleased to see identified in the spatial strategy, there was reference to climate change, placemaking, addressing the nature crisis and enhancing biodiversity. There was also explicit support for embedding the 20-minute neighbourhood approach, and the focus on retrofitting existing buildings and homes.

Others, however, suggested that the national spatial strategy serves little purpose, or is unclear. It was described as a collection of disjointed, high-level aspirations and there was a concern that there is no clear indication of the role its contents should play in the planning system. A connected comment was that it will need significant refinement and expansion if it is to become a useful element in the LDP for any particular area.

There were also questions about how the spatial strategy relates to other sections of the draft NPF, with a suggestion that the spatial principles do not need their own

section and could be incorporated into the place themes. Other suggestions were that:

- The spatial strategy would be more directional if the identification of national developments was clearer and more specific, and these national developments were clearly identified spatially.
- There is a need for further guidance to explain the role and function of the spatial strategy, including how the actions relate to the policies set out in Part 3 of the draft NPF.

Links to other strategic plans

As at Question 7, a number of respondents commented on the relationship between NPF4 and other national, regional or local strategies or plans. General comments included that the spatial strategy would be helped by setting out the important relationships with other plans, programmes and policies which are fundamental to delivering the overall ambitions. More widely, it was suggested that the National Spatial Strategy map (on page 5) should show wider connections to other parts of the UK or to the EU. In terms of national agendas, there was specific reference to:

- NSET.
- The Onshore Wind Policy Statement.
- Housing to 2040.
- The Heat in Buildings Strategy.
- Achieving Net Zero Emissions in Scotland's Buildings.
- Energy Efficient Scotland: Improving Energy Efficiency in Owner Occupied Homes.
- The Land Use Strategy.
- A Scotland for the future: opportunities and challenges of Scotland's changing population.
- The Skills Investment Plan for the Historic Environment.

In terms of regional or local strategic relationships, there was reference to:

- Regional Spatial Strategies. There was a call for Regional Spatial Strategies to be developed as quickly as possible to provide more detailed regional guidance for LDPs, and to inform and be informed by Regional Economic Strategies.
- RLUPs and the Regional Land Use Frameworks.
- RTSs. It was noted that RTSs are essential to the delivery of transport that helps support the delivery of the shared spatial strategy.
- City Region Growth Partnerships.

On the relationship between NPF4 and other strategies, it was suggested that potential conflicts and tensions need to be acknowledged. An example given was

that there is a required integration of NPF4 with other complementary strategies and policies, specifically the Land Use Strategy, yet there is little detail on how this will be achieved.

Deliverability

Some of the comments focused on whether or how the spatial strategy can be delivered, often reflecting some of the issues covered under the analysis for Part 4 – Delivering our spatial strategy (Questions 54 and 55).

Issues raised included that:

- There too many subjective aspirations that are not easily measured, and which are not rooted in land use planning.
- Connected to this, the spatial strategy covers factors over which the planning system does not and cannot exert control.
- The Part 1 narrative does not indicate the weight that should be afforded to the spatial strategy in planning decisions. Carrying forward the statement from NPF3 that LDPs must have regard to the NPF, and that Scottish Ministers expect planning decisions to support its delivery, would go some way to addressing this point.

Other comments addressed resources and included that NPF4 has to be backed up with funding to help deliver the good intentions of the spatial strategy. Further comments included that there needs to be:

- A capital investment programme to deliver the development and infrastructure required.
- A non-political focused national delivery vehicle.
- Adequate investment in planning services to ensure there are planners in place to manage the service and deliver the ambitions set out in NPF4.

Other comments also addressed how the spatial strategy will be delivered on the ground. Specifically, it was reported that NPF4 will bring further complexity and place additional requirements on planning authorities, including when assessing and determining planning applications and reviewing LDPs. It was suggested that this will require additional resources and the upskilling of planning staff and elected members.

Area-focused themes

In terms of how well the spatial strategy considers the needs of Scotland as a whole, it was suggested that the spatial strategy needs to be more consistent across the regions and recognise the links and interdependencies between them. It was also thought that the spatial strategy and action areas could do much more to address the disparities and inequalities between communities across Scotland, particularly in the larger area authorities with networks of communities that are most distant from each other, and therefore face greater challenges and require more significant per capita investment to achieve net zero.

One perspective was that there is an emphasis towards urban needs, with not enough support for the rural parts of Scotland. It was suggested that NPF4 should aim to support rural communities with the increasing challenges these areas are facing into the future. There was specific reference to the national ambition for appropriate rural repopulation and to considering the needs of remote communities.

An alternative perspective was that there is insufficient emphasis given to urban areas, and a lack of differentiation around towns and cities, which have different requirements and different needs. For example, it was suggested that the draft NPF often talks about town centres, but the needs of core city centres are also vitally important to the economy and attractiveness for tourism and employers.

In terms of the location of urban areas, it was felt that the application of a rural label to areas such as Highland misses the very significant urban context and opportunities that these areas also have.

Missing themes across the spatial strategy

There were also a number of suggestions for themes that respondents wanted to see covered, or given greater coverage, in the national spatial strategy. These included:

- Net zero and climate resilient communities. It was suggested that the spatial strategy does not go far enough in addressing the climate emergency and ensuring Scotland reaches its 2030 net zero targets.
- Renewable energy. Points included that, given the urgent requirement for the expansion and generation of renewable energy, it is unclear why the emphasis changes fundamentally from area to area. It was suggested that the delivery of renewable generation projects should not vary from region to region and should be a national and regional 'Golden Thread Policy'.
- The circular economy, including an industrial transition that creates a more circular economy, support for geographical areas of circular economy expertise in particular sectors, and opportunities to support industries focused on closed-loop recycling.
- The emissions associated with the creation, maintenance and refurbishment of buildings and infrastructure. It was suggested that this involves evaluation of construction processes and material choices, but also ensuring that existing materials can be reused.
- Halting and reversing biodiversity loss. It was suggested that the need to protect biodiversity and irreplaceable habitats has not been fully recognised.
- Safeguarding iconic and other valued landscapes for future generations to enjoy.
- The 'Precautionary Principle'. It was noted that it currently appears only in relation to coastal flooding and major landscape impacts.
- Food and agriculture. It was suggested that food security and resilience is a vitally important issue but is largely ignored. It was also noted that agriculture is also a major economic activity in many rural areas, with the potential to be

even more valuable in the future. There was also a call for growing initiatives - bespoke to communities needs and local conditions - to be included in all the action areas.

- Health and particularly health inequalities. There was a concern that, despite improving the health and wellbeing of the people of Scotland being one of the identified outcomes of NPF4, the content of the national spatial strategy makes little reference to health.
- Safe space. It was suggested that any spatial strategy which is looking at developing and improving space for our communities needs to have safety as a core theme, and should prioritise areas of inequality.
- The needs of older people. It was seen as surprising that there is no reference to the key issue of an ageing population within the national spatial strategy section. There was also a call for detail on housing for varying needs and how the spatial strategy will ensure there is an adequate supply of accessible housing and housing that will meet the needs of an ageing population.
- The sustainability and development of the Gaelic language. There was a call for NPF4 to support the Scottish Government's commitment to increasing the number of people using and learning Gaelic.
- The role of culture and creativity. It was suggested that the challenges and opportunities are not addressed sufficiently and that while the focus on cultural heritage is welcome, the cultural sector is wider than this.
- The contribution of heritage to the vision for Scotland's places. It was suggested, for example, that reference to heritage assets under the Sustainable places and Productive places themes would help set out the vital role that these assets play in driving tourism, creating jobs, attracting business, and ensuring high quality and unique places.

A number of comments related to infrastructure and included that there needs to be more direction and focus on infrastructure delivery. It was seen as vital that NPF4 addresses infrastructure delivery challenges, and acknowledges that a failure to do so will be a major obstacle to investment and inclusive economic growth. There was specific reference to:

- Electricity infrastructure and the importance of grid investment. The concern was that this does not feature across all of the action areas, despite being critical to achieving many of the priorities identified in the spatial strategy. There was a call for grid investment to be recognised as a vital enabler to each action area's decarbonisation and resilience objectives.
- Waste and recycling infrastructure and the role of the planning system in delivering what is needed for the delivery of circular economy objectives.
- Expansion and full electrification of the Scottish railway network, as one of the key methods of reducing emissions from travel and achieving a zero carbon society.
- The spatial needs of the freight industry. It was suggested that consideration should be given to the support the sector needs, for example in relation to: the

decarbonisation journey and the relationship with energy networks; infrastructure requirements to support the shift from road to rail; and infrastructure requirements to minimise the impact of freight and logistics on towns and cities.

- Airports. It was seen as disappointing that the spatial strategy fails to recognise the importance of connectivity by air, other than for island communities, and the importance of tourism to the Scottish economy, along with the sectors that enable the tourism industry.
- Resilient broadband and connectivity infrastructure. This was described as underpinning the Scottish economy and there was a concern that the spatial strategy does not detail the importance of building and maintaining a resilient digital network using fibre.

Finally, there was a concern that the spatial strategy does not recognise the importance of community empowerment. Connected points were that:

- It is too centralised and will not reflect local need and aspiration.
- Greater recognition must be given to community empowerment legislation with planning policy formulation stemming from this.
- A presumption in favour of community-led development is needed. To ensure that this presumption has substantive outcomes for communities, it was suggested that it is qualified to apply to community-led projects which build significant community wealth.

Part 2 - National Developments

National developments are significant developments of national importance that will help to deliver our spatial strategy. Eighteen national developments are proposed to support the delivery of our spatial strategy. This designation means that the principle of the development does not need to be agreed in later consenting processes, providing more certainty for communities, business and investors.

Question 19 – Do you think that any of the classes of development described in the Statements of Need should be changed or additional classes added in order to deliver the national development described?

Question 20 – Is the level of information in the Statements of Need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

Around 280 respondents commented at one or both of Questions 19 and 20.

General comments on national developments

A number of issues were raised in relation to the implications of national development status, including suggestions that:

- It would be helpful to explain how national developments might interact with Regional Spatial Strategies and with the action areas identified in Part 1 of the draft NPF.
- Links between different national developments, and between national developments and related policies, should be highlighted.
- Guidance will be needed with respect to how to balance the competing priorities of different national developments.

It was also suggested that national developments should carry a presumption in favour of planning consent. However, in relation to the Hierarchy of Development Regulations, it was noted that:

- There may be proposals that would contribute to delivering a national development but that individually do not constitute a national or major development.
- Reference to classes of development may cause confusion as some of the proposals listed would not be considered to be 'development' from a planning perspective.

It was also suggested that more clarity is needed around the process to be followed when submissions for planning permission are made, and an explanation (or separate guidance) on what national development status means in terms of the development management process was requested. Concerns were raised with respect to the complexity of the application process, and it was argued that the provisions are more onerous than would be applicable to 'ordinary' development.

Meeting the needs of stakeholders

It was suggested that there should be greater reference to the importance of community participation and involvement in relation to national developments, along with further information on how this can be supported.

Question 20 asked whether the level of information provided in the Statements of Need is enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development. Some respondents commented on the Statements overall, with views both that the level of information provided is sufficient and that it is not.

Points made by respondents who broadly agreed that the Statements of Need are appropriate included that using the major development threshold is helpful, as authorities and stakeholders are familiar with this concept. It was also noted that when developments are submitted for formal consideration they will be site/area specific, making it easier for local communities and interested stakeholders to understand the nature of the proposal.

Concerns raised by those who did not think the level of information is sufficient included that listing classes of development under larger projects may create ambiguity regarding whether a specific proposal is or is not included. It was also argued that the proposed approach is likely to increase workload for planning authorities as proposals will need to be screened to establish the status of the development under the NPF4 classes of development and the Hierarchy of Development Regulations. Also in relation to assessment of proposals, the use of the terms 'such as' and 'including' was seen as unhelpful.

Some of those who did not think the level of information provided is sufficient called for more information or for greater clarity, with further suggestions including that:

- Additional information could be provided through up-to-date websites for each national development, facilitated through a central portal.
- NPF4 should use the terminology in the Hierarchy of Development Regulations to make it easier to decide when a proposal should be handled as a national development.
- Different groups of stakeholders may require information to be presented in a way that best suits their needs. In particular, it was suggested that the Statements of Need may not be accessible to communities or non-technical audiences.

In terms of specific information it was noted that, although life cycle greenhouse gas emissions are considered, other consequences of the proposed national developments have not been set out. There was reference to how each project may influence population movements, the supply chain and where people work and live.

Selection of national developments

It was suggested it would be helpful to set out the rationale for selecting those chosen and why some are conceptual, and others are existing proposals. Respondents were also looking for explanations regarding why:

- The parameters of some national developments carried forward from NPF3 have been changed?
- Some NPF3 national developments have not been carried forward into NPF4?

The absence of a mechanism for local authorities to resubmit candidate national developments was highlighted.

Although respondents were not asked directly, a number did comment on whether they supported some or all of the national developments proposed. A small number of respondents simply offered overall support for all of the national developments, while others referenced their particular support for one or more of them.

There were also a number of respondents who appeared to support the overall theme of a national development, for example that High Speed Rail or Strategic Renewable Electricity Generation and Transmission Infrastructure should be a national development, but then went on to raise a number of issues or concerns about the national development as currently described. Some of the issues raised related to the location of the national development and were sometimes focused on it being expanded to other parts or all of Scotland. Others were focused on one or more of the classes of development as currently described.

These issues, along with concerns raised by the small number of respondents who noted that they did not agree with one or more of the national developments set out, are covered further below.

Comments on the proposed national developments

The analysis below presents a brief summary of comments made in respect of each of the 18 national developments. It focuses on the questions posed in relation to the classes of development and whether the Statements of Need is enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development.

National developments to deliver sustainable, liveable places

ND1. Central Scotland Green Network (CSGN)

Around 45 respondents commented on the CSGN, some simply noting support for its continued designation as a national development. It was suggested that the CSGN is an effective way to demonstrate the importance of connecting national developments with policies, and links to a number of individual policies were suggested, including Policy 3 (Nature crisis) and policies under the Distinctive places theme. Making clear links to ND4 (Urban Sustainable, Blue and Green Drainage Solutions) and to the Central urban action area's strategic action 20 (Re-imagine the urban fringe) were also suggested. There was also a call for adaptation

to climate change through sustainable blue and green infrastructure to be highlighted as one of the important functions of the Network.

It was also reported that status as a national development is not of itself enough to ensure that development plans will fully incorporate the national policy. Greater detail and more guidance on how LDPs and spatial strategies should be used to articulate and deliver national developments was suggested. It was noted that many planning authorities within the CSGN have produced supplementary planning guidance relating to the Network, and there was concern that this could be lost or watered down. Some respondents proposed specific actions with respect to taking the priorities of the CSGN forward.

In terms of the area that is to be covered, it was suggested that there is no reason to exclude the north Fife coast. There were also calls for the CSGN to be expanded to be a Scotland-wide national development, or for the creation of a Scottish Nature Network.

With respect to public access, it was observed that clear requirements for provision and protection of public access to land and routes included in SPP are absent from NPF4. It was argued that NPF4 should make clear reference to the need for planning decisions and developments to protect existing local paths (including key informal routes), and to facilitate non-motorised connectivity for the purposes of health, social inclusion and modal shift. There was also a request to make clear that shorter routes as part of local path networks, as well as longer distance routes, are required and to recognise the different benefits that both types of routes bring to people and their local communities.

With respect to nature-based solutions and connectivity of habitats, comments included that:

- Highlighting woodland and peatland as a priority may undermine the value of other habitats; the statement ‘nature-based solutions for climate change adaptation and mitigation may include woodland expansion and peatland restoration as a priority’ should be replaced by a steer to consider habitat priorities as defined by local nature networks.
- The second sentence should be amended to read that ‘the connectivity of biodiversity rich areas may be enhanced through nature networks for all habitat types, including corridors and stepping stones to provide enhanced natural capital and improved ecosystem services’.

Designation and classes of development

Comments on designation and classes of development included that:

- Class (a) should specify change of use of land and engineering works or other operations to deliver green infrastructure, habitat creation or enhancement that results in emissions sequestration, adaptation to climate change or biodiversity enhancement. While these may not be ‘new or extensions’ to green infrastructure, they may enhance existing areas.

- Not all greenspaces benefit from multi-functional uses and this could compromise existing biodiversity value on site.
- Rather than 'creation of blue space' there should be integration of blue within all green thinking.
- Class (d) could be extended to include providing space for markets for local farming produce.
- Class (e) should be amended to read 'Routes for active travel and/or recreation that incorporate new or enhanced green infrastructure'.

It was also argued that local food production is not just a concern for central Scotland and that land for food production should be a national development in its own right, and not just a class within the CSGN.

Deciding when a proposal should be handled as a national development

There was a view that NPF4 should more clearly define what the CSGN is, along with how its delivery will be aided through planning, and it was suggested that specific reference to individual delivery projects within the CSGN could be included in the statement of need.

With respect to the location of the CSGN, it was noted that this is a Scottish Government partnership initiative, and that the boundaries are not set by the Green Action Trust. Issues highlighted with respect to the extent of the Network as illustrated included that:

- The Perth and Kinross Council area is not within the CSGN as is suggested by the figures on page 31 and 45.
- If the Loch Lomond and Trossachs National Park is not covered, the map should be amended accordingly.

Clarity with respect to boundaries was seen as important since NPF4 will be part of the development plan.

ND2. National Walking, Cycling and Wheeling Network (NWCWN)

Around 45 respondents commented on ND2. Inclusion of the NWCWN as a national development was welcomed, although it was also argued that the policy has limited applicability for reducing routine car journeys in rural Scotland. The importance of investment to deliver the network was highlighted, including a view that significant infrastructure investment, over and above existing budgets, will be required. Clarity was also requested with respect to which active travel routes are currently considered part of a national network, how routes would demonstrate that they form part of the national network, and how the network will be supported at a regional and local level.

It was also argued that there should be a greater focus on routine, local pedestrian and cycling environments, rather than too great an emphasis on a national network. Local pavements were observed to be the most important active travel infrastructure for most disabled people.

In terms of content of the statement of need, it was suggested that a clearer statement of the need for wider active travel connections to existing services is needed, and that this may require improvements to existing infrastructure beyond the immediate development site. It was argued that delivery of this type of improvement may be hindered by the developer contributions policy, so a connection to the national development is vital.

Other suggestions included that:

- The relationship with STPR2 Active Travel Infrastructure recommendations should be clarified.
- Terminology should be consistent with STPR2, which uses the term 'mobility hubs'.
- Confusion with the Sustrans 'National Cycle Network' should be avoided.
- The value for recreation, and to the tourism sector, should be mentioned.
- Specific long distance walking routes and local active travel networks could be referenced.

With regard to the creation of the NWCWN, there were calls to maximise opportunities to embed climate resilience and to ensure opportunities to manage surface water for the wider catchment area are not missed, blocked or made significantly more difficult or expensive to deliver in the future. Other recommendations included that:

- The need for road space reallocation should be recognised.
- Routes should run through, and be linked to, blue-green infrastructure and designed to conserve biodiversity and maintain the surrounding landscape. Guidance on protecting existing/surrounding landscape when making planning decisions on new road infrastructure should be provided.
- Key services and amenities should be signposted across the network to ensure safe routes for public access, while discouraging people from diverging away from pathways where they may cause unintentional damage to the landscape.

In terms of access to the network itself, points raised included that:

- The need for segregated cycle lanes should be addressed.
- Upgrading must include removing barriers to disabled people using adapted bikes, tricycles and mobility equipment.
- Barriers should not be created for other forms of multi-use access available under the Land Reform (Scotland) Act 2003, such as horse-riding.

Designation and classes of development

Comments with respect to designation and classes of development included that The Town and Country Planning (Hierarchy of Developments)(Scotland) Regulations 2009 do not include active travel infrastructure within the transport infrastructure category of major development. It was suggested that many individual

elements that create a national network would not be considered as major developments as they will be shorter than the 8 km distance cited in the 2009 Regulations. The connected point was that there should be support for smaller sections of routes to contribute to, and be part of, the national development.

It was also argued that the designation and classes of development should be strengthened to reference 'a nationally-connected network that facilitates short, medium and longer distance journeys and linkages between settlements, visitor destinations and to multi-modal hubs.' However, there were also concerns that a requirement for a route to create 'linkages to multi-modal hubs' could exclude most of the network that is currently proposed.

Other suggestions included that:

- There may be situations where routes are not suitable for all users in the short term, for example steep routes that may only be suitable for cycling or walking until they can be upgraded; the text should be amended to '...suitable for a range of users for walking and/or cycling and/or wheeling...'
- Additional classes should be added to include, where relevant, land for sustainable travel rather than just routes for active travel.
- The designation and classes of development should be expanded to include and reference routes for active travel and recreation.

In addition to the 'Lifecycle greenhouse gas emissions assessment' it was proposed that there should be a similar assessment of the impact on physical activity and health.

Deciding when a proposal should be handled as a national development

It was suggested that the interpretation of this national development could be extremely broad, and that more clarity is required on what proposals or routes would be part of a national network. Clarity was also sought as to whether 'new/and or upgraded routes suitable for a range of users for walking, cycling and wheeling' would align with Part 6 of the Hierarchy of Development Regulations, and therefore be a major development.

ND3. Urban Mass/Rapid Transit Networks

Around 30 respondents commented on ND3. Points raised included that this national development is supported, but also that it should include Dundee or should be extended to be a Scotland-wide development. The need for stronger public transport connectivity in rural areas was also highlighted and it was suggested that visitor/leisure journeys – such as into the National Parks – should be referenced.

Other issues raised included that a joined-up strategy should take account of new active travel routes as part of the NWCWN recommendations in STPR2, and other strategies and route maps. It was suggested that the alignment with STPR2 recommendations 11 (Clyde Metro), 12 (Edinburgh and South East Scotland Mass Transit) and 13 (Aberdeen Rapid Transit) should also be made clear.

Other issues highlighted included that:

- Placemaking, place quality, health and wellbeing and sustainable investment for inclusive economic growth should all be referenced.
- There should be a greater emphasis on bus prioritisation.
- The need to ensure that networks are climate resilient, particularly to the impact of extreme weather events, should be emphasised.
- Opportunities to manage surface water for the wider catchment (with an adaptation and resilience focus) must not be missed, blocked or made significantly more difficult or expensive to deliver in the future. It was reported that creating networks to move people and vehicles can also create space and connections for blue-green infrastructure, and positively support the Scottish Government Water Resilient Places policy recommendations.
- Mass transit expansion must be designed holistically with associated active travel provision to ensure safety, as well as boosting active travel. Specific reference should be made to ensuring segregated cycle provision alongside tramlines, and the provision of safe crossing points of the tramlines for both cyclists and pedestrians.
- Wildlife road mitigation, such as the use of more mammal tunnels, wildlife road signage and appropriate fencing to protect existing habitats, should be considered.

Designation and classes of development

Comments on designation and classes of development included that support for new road infrastructure to deliver low carbon mass/rapid transport projects should be applied strictly. It was suggested that this would ensure ND3 is not interpreted as applying to new road infrastructure beyond that which is already committed.

Several additional points were made specifically with reference to the Clyde Metro, including that enabling/ancillary development, such as high density mixed used development linked to Metro Interchanges, stations or key stops, should form part of the designation for this national development.

ND4. Urban Sustainable, Blue and Green Drainage Solutions

Around 25 respondents commented on ND4. While this national development was welcomed, it was also argued that the principles apply beyond Glasgow and Edinburgh and that Sustainable, Blue and Green Drainage Solutions should be extended to other cities and urban areas, or should be a Scotland-wide national development.

It was also suggested that the word 'drainage' should be removed from the title to ensure that these developments are not seen as solely having a drainage function. It was thought that the emphasis should be on the planning and delivery of multi-functional blue and green solutions, with a clear link to the CSGN (ND1) proposed.

It was also suggested that the statement of need should clarify the language used with respect to Sustainable Urban Drainage Systems (SuDS). It was noted that while designed to mimic natural approaches to the management and treatment of surface water, SuDS are engineered solutions. Since the statement of need states

an ambition to minimise the use of built engineered structures, it was argued that it should be made clear that SuDS are a key part of blue green infrastructure.

Other suggestions included that the statement of need should:

- Highlight the success of the Glasgow and Edinburgh Strategic Drainage Partnerships, due to the collaborative nature of these partnerships and their approaches to innovation, decision-making and shared action.
- Reference catchment-scale approaches and improving water quality. It was reported that better management of surface water drainage has the potential to contribute to reducing downstream impacts on water quality and ecosystems, including estuarine and coastal waters, and could form a useful part of a broader source-to-sea policy.

Opportunities to link a nature-based approach to this national development, and to a wider nature network, were also highlighted.

Designation and classes of development

Comments on designation and classes of development included that it is unclear whether this is meant to apply to any form of major development that requires a drainage or water management solution. It was also suggested that the classes of development should mirror those for ND1, to enable opportunities for creating national level developments that support both.

Deciding when a proposal should be handled as a national development

It was suggested that clearer wording is required on policy requirements for consideration as a national development, and that it is currently unclear whether national development status would apply to any form of major development that requires a drainage or water management solution.

With respect to the scale of development that might be required to qualify as national development, it was argued that both the delivery of small retrofit opportunities, and large-scale infrastructure, will be required. It was suggested that it is not clear how this mix of large- and small-scale interventions would be supported as a national development.

ND5. Circular Economy Materials Management Facilities

Around 20 respondents commented on ND5. Several respondents expressed support for this national development, including that materials facilities could play a significant role in delivering greater sustainability in the construction and demolition industries. It was suggested that the statement of need should highlight the forthcoming waste targets route map, setting out new policies and interventions to improve recycling rates, and making the case for a national need for additional waste management infrastructure.

A possible conflict between expressed support for national waste management developments and the site-specific constraints that might apply, was also highlighted. There was a call for more direction and detail in relation to how facilities

would manage any emissions and mitigate localised impacts, including on neighbouring communities and the wider environment.

It was argued that continued use, followed by repair, are the top value purposes in the circular economy and that, in the context of climate change and adaptation, maintenance and repair should be a national priority. Policies on circular economy and waste management were argued to concentrate too much on operational waste and carbon management and not enough on embedded or embodied carbon and energy.

There was a view that the designation may confer limited benefits to the waste management industry, and that the scope of development covered is somewhat limited. Rather than limiting the scope of national development to the four classes of waste development specified, it was suggested that NPF4 should enable delivery of a network of integrated waste management facilities. It was argued that the national development should reflect waste management as an essential service that can deliver carbon reductions through sustainable management of waste.

Other comments include that:

- A statement of support for smaller scale versions of the types of developments identified should be included since, if not explicitly included in the national development designation, such small-scale facilities might have to provide more justification for need than larger scale ‘major’ facilities.
- Although there is potential to support increased circularity in the construction sector, maximising the benefits will require facilities to be located close to the supply and demand of secondary materials to avoid unnecessary transportation of large volumes of material.
- There should be an emphasis on opportunities for material storage and reuse in building repair, maintenance, and construction.

Designation and classes of development

Comments on designation and classes of development included that:

- Individual classes should be clarified.
- Terminology should be amended to follow that used in the waste hierarchy, and to be consistent with the Waste Framework Directive. It was reported that ‘repurposing’ is not terminology used in the waste hierarchy or in waste regulation.

Deciding when a proposal should be handled as a national development

There was a view that the statement of need does not provide an adequate level of information for clear decisions to be made; to avoid unintended outcomes, there was a call for clarity with respect to how ND5 will be delivered. There were also calls for definitions of the classes of development listed and greater clarity with respect to the type of proposals that would be accepted, for example with respect to the scope, size and parameters of facilities. In particular, it was suggested that it may be helpful to set out what is not in the scope of this national development in

terms of end-of-life waste infrastructure. Clarification that residual waste treatment facilities are excluded was also suggested.

ND6. Digital Fibre Network

Around 25 respondents commented on ND6. The majority of comments were brief and largely limited to expressions of support. The importance of connectivity was highlighted in relation to remote access to services, Mobility as a Service, and reducing unnecessary travel. However, it was also noted that 'high speed broadband' is rapidly being overtaken by 'fibre to premises', and it was suggested this should be made a national strategic objective.

Respondents also highlighted the importance of:

- Preventing harm to existing wildlife/sealife habitats and biodiversity.
- Prioritising, addressing and mitigating impacts on the most valued and sensitive sites.
- Considering safeguards for health in relation to routes and masts.

It was also noted that some proposals do not require planning permission.

Designation and classes of development

Comments on designation and classes of development were limited to a query in relation to is meant by a green data centre.

National developments to deliver sustainable, productive places

ND7. Islands Hub for Net Zero

Around 25 respondents commented on ND7. General points included that it is not clear why net zero projects are national developments only if they are proposed in the Western Isles, Shetland and Orkney Island groups, and that consideration should be given to supporting these more widely. In particular it was argued that the national development could be extended to include Highland in light of, for example, Opportunity Cromarty Firth.

It was also suggested that the title of this national development is confusing and that it could be mistaken for the Islands Centre for Net Zero, a project initiative supported through the Islands Growth Deal.

With respect to the description section, it was suggested that amendments are necessary to reference:

- Scapa Deep Water Quay development.
- Extension of Hatston Pier, Kirkwall.
- The link with offshore wind and ScotWind.

It was also noted that the Orkney Research and Innovation Campus, mentioned as 'proposed' in the text, is already under development.

Other comments included that:

- It is important that the role the islands have in demonstrating the role of marine energy, as part of the wider energy system, is recognised in NPF4 and that appropriate use classes are included to facilitate this.
- Support for ports as near-Arctic marine transport and logistics hubs is welcomed but requires further definition.
- The handling of ultra-large container ships at Scapa Flow seems to be an unlikely inclusion for a number of reasons, including that such ships will not be early to decarbonise. It was also suggested, however, that the need and opportunity are greater than since the initial NPF4 consultation.

Some respondents focused on concerns about the protection of World Heritage Sites and Marine Protected Areas (MPAs) associated with Orkney, Shetland, and the Western Isles, including St Kilda. It was noted that these areas are rich in cultural and natural heritage, and it was argued that national development status must not be used to override the protection and preservation of heritage assets, including but not limited to those found at Scapa Flow.

It was also observed that the statement of need does not recognise the importance of Scotland's islands for a wide range of internationally and nationally protected species and nature sites. It was suggested that there should be emphasis on the need for developments to avoid negative impacts, comply with relevant legislation, have a net positive impact and act as good example of sustainability.

Designation and classes of development

Comments on designation and classes of development included that this national development has the potential for significant impacts on nature. As the classes involved are extensive, it was suggested that it will be essential that development can be assessed for impacts on nature, in particular the cumulative effects on Special Protection Areas (SPAs) and marine mammals.

Comments on the individual classes listed included that:

- It would be helpful to clarify whether development providing employment in class (a) applies only to employment directly related to the Islands Hub for Net Zero.
- Class (b) should read 'exceeding 50 megawatts capacity' to reflect the Electricity Act threshold.
- In class (d) the description of infrastructure is unclear. Also, if a containerised solution is adopted by the sector, this classification under the 2009 Regulations may not be the most appropriate solution for green hydrogen.
- With respect to class (f), the proposal for floating structures to be introduced to support offshore wind might not be covered by text drawn to only include the present terrestrial proposals. The text could be made more flexible to accommodate a wider range of project opportunities across these locations.

- Both (f) and (g) should be amended to support ‘quays’ rather than the singular ‘quay’.
- (h) should be amended to include specific reference to Sullom Voe (rather than ‘Shetland’) so it reads ‘oil terminal modifications at Scapa Flow and Sullom Voe...’. It was noted that it is also possible oil terminals may grow to be more than just ‘terminals’ in the light of plans to use renewables to produce a variety of synthetic fuels.

There were also requests for additional classes to be added to include: a specific reference to the ‘ORION Clean Energy Project’ in Shetland and its related requirements for development; and aquaculture as a potential recipient/co-located activity to hydrogen energy.

Lifecycle greenhouse gas emissions assessment

With respect to the emissions assessment it was noted that production of ‘renewable hydrogen’ requires significant volumes of water, so when calculating the carbon cost of hydrogen production, the cost of water production and transportation should be included. Since island water supplies are often limited, the impact of water used for hydrogen on the local water environment and the ability of Scottish Water to provide resilient potable water services, should be considered.

ND8. Industrial Green Transition Zones (IGTZs)

Around 30 respondents commented on ND8. IGTZs were welcomed, although it was also suggested that Aberdeen, Sullom Voe, Opportunity Cromarty Firth and industrial and service bases within the Inner Moray Firth should be added to the proposed locations at St Fergus, Peterhead, and Grangemouth.

Also with respect to location, amending ND8 to refer to ‘St Fergus, Peterhead, Grangemouth and surrounding area’ was suggested, as was the addition of a red line boundary plan to define the geographical extent of the proposed IGTZs. It was proposed that the ‘Scottish Cluster’ IGTZ should encompass a broad area, including Peterhead, St Fergus and adjacent coastal land, in order to provide sufficient space for major industrial and energy infrastructure projects. It was also argued that IGTZs must not be located to the detriment of existing green spaces.

As an area of great national and international importance, it was argued that Peterhead should be given weight more comparable to Grangemouth within the national development.

CCS was considered to have a crucial role in decarbonising industry, with applications in relation to capturing carbon dioxide (CO₂) from industrial fossil fuel uses, processes such as cement manufacture, production of hydrogen from natural gas (blue hydrogen) and energy from waste (EfW) plants. It was also noted that the geology of the North Sea presents an economic opportunity for Scotland to offer a CO₂ storage service. Amendment of the statement on the Grangemouth Investment Zone, to make clear that any storage would take place in the North Sea, was suggested.

It was also suggested that the national development should commit to improving the economic efficiency of hydrogen production by investing in the use of by-products, and should also reference: desalination plants to facilitate hydrogen production; use of hydrogen derivatives, alongside hydrogen, particularly for the purposes of fuelling; and the use of hydrogen or hydrogen derivatives in gas blending, particularly at St Fergus.

Since the Scottish Government has committed to having 5GW of green hydrogen in Scotland by 2030, it was suggested this target should be acknowledged. An increased focus on established technologies such as wind, solar and battery storage was also suggested.

Other respondents expressed opposition to the production of blue hydrogen from fossil fuel with CCS as an alternative to renewable energy technologies. It was argued that this national development should not support the use of CCS as a means to extend the lifespan or operating capacity of existing fossil fuel plants, or enhanced recovery of oil and gas. While the statement that 'if any IGTZ is found to be incompatible with Scotland's transition to net zero, Scottish Government policy will change accordingly' was noted, the mechanism by which such a finding might be reached was seen as unclear. A precautionary approach was advocated, with relevant technologies thoroughly scrutinised prior to approval. The need to ensure the potential of existing carbon storage capacity is achieved as the first principle was also noted.

Concerns were also raised with respect to the reference to bioenergy in the statement of need. It was argued that burning wood for energy is not carbon neutral and that bioenergy should be removed from the classes of development.

Some respondents commented on issues related to flooding. It was suggested that developments should be designed to be adaptable and resilient to the impacts of future climate change to ensure that future investment in these areas can be made with minimal risk. It was also noted that some development types may be covered by flooding legislation and will not be considered within the planning system.

Issues raised specifically in relation to Grangemouth included that:

- In the interest of community wellbeing, town centre regeneration should be in advance of, or in tandem with, proposed industrial expansion.
- To reduce congestion and negative environmental impacts, port access needs to be managed in a way that segregates port road traffic from community road traffic.
- Flood protection scheme proposals will have significant impact on the community and need to be implemented sensitively.

It was also suggested that the Grangemouth Flood Protection Scheme may have significant adverse impacts on the Firth of Forth SPA, but that the appropriate assessment is not yet available. It was argued that significant enhancement of biodiversity should be provided, in addition to any works required as part of mitigating and/or compensating for the adverse effects of the development.

Although recognition of the potential to repurpose existing infrastructure was welcomed, it was argued that circular economy principles could be more clearly integrated into IGTZs. As an illustration, it was suggested proposals for CCS or renewable energy solutions should require consideration of future maintenance and the reuse potential of materials used.

Designation and classes of development

Comments on designation and classes of development included that class (d), and potentially (b) and (g), will occur in the marine environment and are therefore subject to marine rather than terrestrial plans. Other suggestions included that:

- Class (d) does not refer to the potential for hydrogen production offshore, only to offshore storage of captured carbon.
- Class (f) should also include explicit reference to storage as well as the production of hydrogen.
- Class (g) 'on or near-shore geological storage of hydrogen' seems unnecessarily restrictive, given that it excludes off-shore.
- Class (h) should include explicit recognition of the import and export of CO₂ within the need for port facilities for the handling and transport of CO₂.
- Class (i) should be removed.
- Class (o) should be amended to add 'and/or electricity infrastructure'.
- Class (p) should be amended since the port of Grangemouth does not support passenger vessels.

Addition of classes in relation to port-related infrastructure and freight facilities was also requested in relation to the port of Grangemouth.

ND9. Pumped Hydro Storage

Around 20 respondents commented on ND9. Comments in relation to the location of ND9 included that it should not be described as 'all Scotland' in view of the specific requirements of topography and landform. It was also suggested, however, that the text and map should be expanded to include pumped hydro schemes with permission or otherwise identified as vital for strategic reasons, not just the single one noted. Coire Glas, Red John and Sloy were all referenced. There was a view that prioritising Cruachan pre-judges the delivery timelines for other schemes, and it was argued that all pumped hydro storage above 100MW in capacity should be considered as a national development.

Consideration of wider potential energy storage technologies and opportunities within this national development was also suggested.

Other issues raised included that:

- Creation of local economic and community benefits and employment opportunities should be referenced.

- The potential impacts on the natural environmental and biodiversity are not mentioned in the challenges and opportunities section. Serious concerns were raised with respect to potential impacts on wild migratory fish species.

Designation and classes of development

Comments on designation and classes of development included that:

- Class (b) should be amended to add ‘...related to the pumped storage development’. Otherwise, it would seem to apply to all electricity generating structures.
- Since pumped hydro storage facilities can require both transmission and distribution infrastructure to export electricity to the grid, class (f) should read ‘new and/or replacement transmission and distribution connections directly linked to the pumped hydro scheme.’

ND10. Hunterston Strategic Asset

Around 15 respondents commented on ND10. It was requested that the location ‘Hunterston Port and Hunterston A power station site’ should be amended to incorporate Hunterston B power station and the marketable employment land at Hunterston Estate identified in the Hunterston Strategic Development Area as defined in North Ayrshire’s Adopted LDP. It should also be noted that Hunterston B has commenced the decommissioning phase. A red line boundary plan to confirm the geographical extent of the site was suggested.

With respect to strategic context, it was suggested it would be helpful to reflect the national scale of opportunity of a blue economy centred at Hunterston and a planned marine centre at Ardrossan.

The need for careful early planning was highlighted in relation to potential negative effects on a number of nationally important natural assets, including Southannan Sands Site of Special Scientific Interest (SSSI) and Ailsa Craig SPA. It was noted that the draft NPF references a community wealth building approach at Hunterston, and it was suggested that one aspect of this might be to involve community representatives in helping to manage natural capital assets, notably the SSSI.

Other comments included that:

- Development activity must be planned strategically to avoid impacts to ancient woodland.
- More clarity is needed around how this national development relates to the Place Principle and placemaking, and how Hunterston could relate to the CSGN.
- Sea, road and rail connectivity, and access requirements for the site, should be included and should be linked to STPR2 recommendations on improving the resilience of the trunk road network, including the A78.

It was also suggested that the requirement to ‘work within the capacity of the transport network’ could impede future developments at Hunterston, and that a potential need for road and rail network improvements should be recognised.

Designation and classes of development

Comments on designation and classes of development included requests for several amendments to the text as drafted, including that:

- Class (c) should be amended to read ‘facilities for marine construction, energy generation, technology fabrication and decommissioning’.
- Class (d) should be amended to read ‘facilities for marine energy servicing, to include renewable energy generation, testing, assembly, manufacture, servicing, maintenance, training, research and development’.
- Class (h) should be extended to include emerging small nuclear reactors, subject to appropriate legislation and regulation. Also, that class (h) should be extended to include ‘electricity transmission infrastructure’ given the presence of existing high voltage transmission infrastructure.

An additional class was also proposed for a ‘Aquaculture, research and development centre’, and a reference to a proposed digital hub at Hunterston and any associated infrastructure needs was suggested.

With respect to class (f), it was argued that for consistency the language used to describe CCS and/or low carbon hydrogen should follow that used in relation to Grangemouth. The intention to enable CCS was welcomed and it was suggested that there could be potential for CO₂ captured in Ireland, or the west of the UK, to be transported by ship to Hunterston, then by pipeline, road or rail to St Fergus for storage.

Lifecycle greenhouse gas emissions assessment

With respect to the emissions assessment, it was noted that production of ‘renewable hydrogen’ requires significant volumes of water so when calculating the carbon cost of hydrogen production, the cost of water production and transportation should be included.

ND11. Chapelcross Power Station Redevelopment

Around 15 respondents commented on ND11, including a view that there should be a greater emphasis on renewable energy to take advantage of the transmission lines and national grid infrastructure.

Other points related to protection of the natural environment and included that:

- Redevelopment should be designed to retain and enhance an extensive area of nature-rich unimproved grassland. Embedding this natural asset into the green infrastructure of the site, as part of a placemaking approach, will help provide multiple benefits for the local community.
- The potential for habitat creation/enhancement in the area should be acknowledged.
- Development activity must be planned strategically to avoid impacts to ancient woodland.

Designation and classes of development

Comments on designation and classes of development included that the description of the designations and classes of development that are related to CCS and / or low-carbon hydrogen should be consistent across national developments. Other points raised included that 'Low carbon hydrogen' will contribute to carbon emissions and continued fossil fuel dependence and should not be supported.

Lifecycle greenhouse gas emissions assessment

With respect to the emissions assessment, it was noted that production of 'renewable hydrogen' requires significant volumes of water, so when calculating the carbon cost of hydrogen production, the cost of water production and transportation should be included.

ND12. Strategic Renewable Electricity Generation and Transmission Infrastructure

Around 65 respondents commented on ND12. This was the national development that attracted the highest level of comments, and some responses were extensive. Issues that are also discussed in the analysis relating to Policy 19 (Green Energy) are not covered in detail here.

Although aspects of this national development were welcomed, some respondents called for clarity that, in the planning balance, there should be significant weight attached to development that contributes directly to achieving net zero. A presumption in favour of such development was also requested. It was also suggested that ND12 should reference Policy 19 (Green energy).

Although a small number of respondents agreed with the requirement that renewable energy generation developments should equal or exceed a threshold of 50 megawatts (MW) capacity in order to qualify for national development status, this threshold was also questioned, and how development on a scale of less than 50MW capacity should be treated in decision-making was queried. Some respondents argued that it should be recognised that even small-scale projects provide a valuable contribution to meeting renewables targets, or that it should be clear that the absence of national development status for sub-50MW schemes should not be used by decision makers to question the need for a development. It was also suggested that the 50MW threshold should be reduced to 20MW, that smaller schemes could be handled in aggregate, or that all renewable energy generation and storage schemes should be included.

An alternative view was that the threshold should be raised, for example to development exceeding 100MW capacity, since the benefit of such large-scale projects can clearly be seen to be of national importance. It was suggested that development below the threshold would then be determined locally in accordance with placemaking principles and the development plan.

The 50MW threshold was also questioned since development exceeding 50MW capacity is subject to provisions of the Electricity Act. On a related point, it was noted that the 50MW threshold under S36 of the Electricity Act applies only to

onshore generation, with a threshold of 1MW applying to offshore generation. It was argued that, if this cannot be rationalised, then the position and handling of offshore developments between 2 and 49MW should be considered. There were also calls for explicit reference to offshore wind, including the onshore elements of offshore renewable energy developments, and the anticipated role of ports and harbours in supporting offshore wind. References to both ScotWind Leasing and INTOG Leasing were suggested.

With respect to new and/or replacement high voltage electricity lines and interconnectors, it was argued that limiting national development status to infrastructure of 132kV or more may diminish the role of projects below this threshold. Designating all grid infrastructure (whether or not at 132kV) as nationally significant, in order to de-bottleneck a heavily constrained system, was proposed.

Some respondents considered the implications of the 'all Scotland' location. There were requests for plan-led development, spatial guidance or a more detailed strategy laying out where there is a presumption in favour of wind. One suggestion was to create a separate wind energy national development, with specific guidance on where the areas of search for these developments should be. It was argued that the text requires a caveat that while need is apparent, location is something that requires to be determined by consideration of a range of local factors.

The need to avoid unintended and potentially damaging consequences in other policy areas was also highlighted, including in terms of the six qualities of successful places. It was argued that an approach in line with the Place Principle would provide a positive and more collaborative way forward. With respect to landscape, there was a suggestion that landscape considerations and requirements must be reflected in NPF4 to ensure that risks are managed effectively. Poorly planned onshore renewable energy infrastructure (including placement of junctions and cables, and the creation of access roads) was said to have devastating impacts on landscape. It was also argued that an understanding of the cumulative effect of successive developments on the accommodative capacity of the landscape is required.

In terms of natural assets, there were calls to avoid habitat fragmentation, and to ensure protection of sensitive natural assets, such as irreplaceable ancient woodland. A plan-led approach and identification of potential constraints at an early stage was recommended. It was also argued that:

- National development status should focus on the reuse of existing infrastructure, such as repowering existing onshore wind development sites.
- Policy relating to the nature crisis and peatland protection should be referenced, and there should be clear recognition that green energy still needs to address these policy requirements.
- Mitigation measures identified in the Integrated Impact Assessment's (IIA's) Environmental Report should be pulled through to NPF4.

Designation and classes of development

Comments on designation and classes of development included that:

- As noted above, the proposed 50MW capacity threshold set out in class (a) should be reconsidered.
- Classes (a) and (b) should be amended to recognise all renewable energy developments, and upgrades to the grid, as constituting national development.
- It should be made clear that class (b) relates to the high voltage electricity transmission network which is the electricity network involved with the transmission of voltages of 132kv or above.
- What is meant by 'replacement' should be clarified since there are circumstances where the replacement of an electricity line is not subject to the requirement for statutory consent. The term 'new and/or upgraded' used in NPF3 was thought to provide a clearer definition.
- It is not clear whether the reference to 'high voltage electricity lines' includes buried cables to deliver offshore renewable electricity to onshore substations and the text should be amended to 'high voltage electricity lines, cables and interconnectors...'.
• With respect to class (c), it was noted that there is no clear statement linking onshore developments to offshore generation. It was suggested that the designation and classes of development should be amended to more closely reflect ND4 (Enhanced High Voltage Energy Transmission Network) from NPF3.

Other factors that respondents suggested should be referenced in relation to ND12 included the increased energy demands and infrastructure requirements of the decarbonisation of transport, including public transport and mass transit, road and rail freight and logistics, and personal travel.

Some respondents suggested additional classes of development that might be added, including that green hydrogen should be specifically included as a class of development within ND12.

Deciding when a proposal should be handled as a national development

Comments included that, although the reference to a 50MW trigger is clear, there is no further guidance relating to how a proposal should be assessed and determined. It was also argued that spatial references – currently absent from ND12 – would be key to giving local authorities clarity on when a proposal should be handled as a national development.

A further suggestion was, since communities may be unfamiliar with what constitutes a transmission network compared to a distribution network, ND12 could be better worded to make clear that it relates to the high voltage electricity transmission network.

ND13. High Speed Rail

Around 30 respondents commented on ND13. While high speed rail was supported, comments often related to areas of the country that will not benefit from current proposals, with references to southern Scotland, Dundee, Aberdeen and Inverness.

Other points raised included that:

- The relationship to STPR2 recommendation 43 (Major station masterplans) and Recommendation 45 (High speed and cross border rail enhancements) should be set out, including the need for further work to determine the future of high speed rail in Scotland.
- To avoid detrimental impacts, the impact on locally liveable neighbourhoods should be considered. Any route should not affect current and future development areas, their residents, or prejudice delivery of land uses approved through existing consents.
- The statement should recognise the need to embed protection of ancient woodland, veteran trees, and other sensitive biodiversity assets at the outset of project planning. New and enhanced green corridors should be delivered for biodiversity.
- Scottish Government funding priorities and cost recovery proposals for qualifying developments should be included.

Designation and classes of development

Comments on designation and classes of development included that:

- Class (a) does not mention high speed lines.
- Major station masterplans and high speed rail termini should be included.
- A holistic approach to delivery of rail infrastructure, and other types of development alongside it set out in the IIA, should be more clearly referenced in the national development; this would ensure that its role in supporting low carbon, efficient use of land as part of an improved placemaking agenda is clear.

It was also noted that works which benefit from permitted development rights are not impacted by the Hierarchy Regulations, and so are not caught by definitions of national development. It was reported that the definition captures many items which would normally be permitted development, and that would benefit from deemed consent and not needing planning permission. It was suggested that this principle could also apply to transport infrastructure in relation to ND10 (Hunterston) and ND18 (Stranraer Gateway).

National developments to deliver sustainable, distinctive places

ND14. Clyde Mission

Around 15 respondents commented on ND14. National development status for Clyde Mission was welcomed, including as aligning with the Glasgow City Region Climate Adaptation Strategy and Action Plan. It was suggested that combining the

Clyde Mission with ND4 (Urban Sustainable Blue and Green Drainage Solutions), as well as relevant policies on coastal change, flood risk and water management, would help the area adapt to the impacts of climate change. It was also argued that it will be important to consider both the whole hydrological system, and the impacts of climate change on communities along the Clyde, to avoid development that might exacerbate upstream flooding or require hard engineering solutions to mitigate sea level rise and/or storm surge. A commitment to further modelling and analysis was suggested.

Concerns were also raised with respect to the implications for ND14 of a Future Functional Floodplain (as outlined in Policy 13). It was reported that introduction of a Future Functional Floodplain would result in a flood risk constraint affecting over 50% of most development sites and, in combination with Land Use Vulnerability guidance, would render sites virtually undevelopable. It was argued that a proportionate response to flood risk is required, recognising both the hazards posed by different types of flooding and that different responses may be acceptable, depending on the nature of the risk.

Comments about location included that the description is ill defined. It was suggested that 'up to around 500 metres from the river' should be amended to read 'where any part of an application site is within 500 metres from the river'. It was also suggested that it should be made clear that this designation relates to rural Clydesdale as well as urban reaches, and to coastal and estuarine environments.

Other suggestions included that:

- A key outcome should be for learning from the collaboration of the Scottish Government, local authorities, key agencies and universities to be shared to support regeneration and land reuse in areas with similar challenges.
- Improved sustainable transport in support of the five mission areas should be emphasised, and the relationship with Clyde Metro highlighted.
- Opportunities for sustainable high value growth identified within the Strategic Development Frameworks for Govan – Partick and the River Clyde merit incorporation within the development description.
- The opportunity to deliver biodiversity enhancements has not been recognised and should be included to maximise wellbeing impacts, create high quality places and mitigate the loss of biodiversity along the Clyde.
- In order to address the issue of scale and to support local living and adapting to climate change, the classes of development should be presented in reverse order, such that strategic and infrastructure issues are placed first.
- Connections to the Loch Lomond and the Trossachs National Park, via the Vale of Leven, could be recognised.
- Integration of the historic environment and heritage skills could be explored.

Designation and classes of development

As a general point it was suggested that, since several national developments include port-related development, there could be a more general 'presumption in

favour of port development aligned with Scotland's strategic goals'. With respect to this national development, it was suggested that the classes of development should be presented in reverse order, progressing from strategic and infrastructure first to detailed individual sites.

Clarification was requested with respect to the intended scope of development that might be given national development status, including that, as drafted:

- Any 'major' development identified in the list of classes, and within 500m of the Clyde, would be a national development.
- A significant number of developments might be covered. As an example, it was suggested that separate applications for different phases of residential development on the Queens Quay site in Clydebank could be considered national developments.

A concern was raised that, as drafted, ND14 could lead to development of greenfield sites. To avoid an implication that greenfield (and therefore potentially natural floodplain) development along the Clyde from source to mouth, within 500m of the river and coastal edge, would have national development status, clarification was sought that class (b) only applies to vacant and derelict sites.

Clarification was also requested as to whether ND14 applies to vacant and derelict sites only, or brownfield land more generally – the latter having a wider definition which includes vacant and derelict land, as well as other previously used land.

Amendment to (d) was requested to make clear that, for safety or public security reasons, 'new and/or upgraded active and sustainable travel and recreation routes and infrastructure' should be compliant with the Scottish Outdoor Access Code (2005) with respect to an exemption from freedom to roam legislation.

Deciding when a proposal should be handled as a national development

As noted above, some respondents felt that the locations in which major applications become part of the national development are not adequately defined.

There was also a view that, while the catchment-area approach is welcome, the scale could create challenges in terms retaining the clear direction needed and the delivery of meaningful opportunities.

ND15. Aberdeen Harbour

Around 15 respondents commented on ND15. Points raised included that reference should be made to the Port of Aberdeen North and South Harbours, rather than Aberdeen Harbour and Aberdeen South Harbour. Also with respect to location there were views that:

- The area to which the designation applies is unclear.
- Greenfield land near the south harbour should be explicitly excluded.

There were also calls to:

- Reference delivery of the proposed ETZ. The ETZ was seen as an integral part of the Port of Aberdeen South Harbour proposals to secure a green energy transition, and it was argued that NPF4 should make clear that benefits to Aberdeen City can only be secured if the economic opportunity at Port of Aberdeen South Harbour, including the ETZ, is realised.
- Broaden the national development to reflect the Freeport zone being considered and reinforcing existing linkages and future opportunities for synergies between Aberdeen Harbour and the IGTZ in Northern Aberdeenshire.
- Broaden the scope of the national development to help to address causes of deprivation in the vicinity by delivering a sustainable, nature-rich, 20-minute neighbourhood to help regenerate Torry and its quality of environment.
- Adopt a placemaking approach to direct development to optimum areas, focusing on strategic connections including blue-green infrastructure. It was suggested that this should highlight the existing blue-green infrastructure, such as St Fittick's Park, as well as identifying opportunities for enhancement.
- Focus on regenerating existing industrial land, rather than reorganising land use, around the South harbour.
- Make greater reference to how biodiversity, and its importance to communities, will be accommodated.

Clarification was sought with respect to what is meant by a 'development in the location', and how far from the existing North or South Harbours this could be. Whether development has to have some relationship with the harbour, and how this is determined, were also queried.

Designation and classes of development

Comments on designation and classes of development included that:

- Class (c) 'new and/or upgraded green infrastructure' requires further explanation.
- It is of concern that 'buildings and facilities for commercial, manufacturing and industrial uses' covered in class (d) should be considered a national development. A more appropriate approach might be to seek a Masterplan for this area.
- It is not clear whether class (d) applies to both Aberdeen Harbour and Aberdeen South Harbours and whether it relates specifically to renewable and net zero carbon technologies.
- With respect to class (e), it should be made clear that support for hydrogen production relates only to green hydrogen.
- There should be explicit reference to hydrogen pipelines and storage alongside existing references to hydrogen production.

Additional uses were also requested in respect to the proposed ETZ, including in relation to: port-centric manufacturing and distribution; offshore technology; decommissioning, energy transition and renewable energy.

Deciding when a proposal should be handled as a national development

It was argued that both the boundary of the area to which the designation applies, and whether a proposal needs to be related in some way to harbour use, are unclear.

16. Dundee Waterfront

Around 10 respondents commented on ND16. Continued designation of Dundee Waterfront as a national development was welcomed. However, it was also suggested that not all of the Dundee Waterfront development to date has been positive, including because of the need to cross a number of lanes of traffic to reach the Waterfront.

A shift in emphasis from economic revitalisation to include a more balanced place-based aspiration for Dundee Waterfront was suggested, or that there should be more emphasis on how Dundee as a whole will benefit, including bringing together low carbon innovation, the environment, Dundee's location along the Firth of Tay and community benefits. An opportunity to create strategically important green and blue space that could serve as a regional hub, and catalyst for a Tayside green and active travel network, was highlighted.

It was suggested that to protect the internationally important nature conservation sites of the Tay Estuary, a requirement to include consideration of environmental effects should be reflected in the same way as for Aberdeen Harbour.

Designation and classes of development

Comments on designation and classes of development included that:

- A spatial dimension is required to direct development and identify suitable uses. This should also highlight the existing natural heritage assets, such as the Riverside Nature Park, as well as identifying opportunities for enhancement.
- The Waterfront should be an area for active travel and a car-reduced zone.
- Class (d) should be reworded to 'new and/or upgraded active travel and sustainable transport routes', since sustainable transport links in this area integrate more than active travel infrastructure, for example bus infrastructure.
- Consideration should be given to whether the addition of land reclamation for port expansion is a sustainable approach to development. It was noted that reclamation can adversely affect coastal morphology, exacerbate erosion and impact upon natural flood management infrastructure. It was also noted that reclaimed land can also add to the flood risk management financial burden, if protection from rising sea levels is required in the longer term.

- Land reclamation for port expansion will require detailed Habitats Regulations Appraisal (HRA) at the project stage, and may require consideration of derogation arguments.

Deciding when a proposal should be handled as a national development

As noted above, the location information currently provided was not thought to be sufficient.

ND17. Edinburgh Waterfront

Around 10 respondents commented on ND17, with general points including that there should be read across to ND1 (CSGN), ND2 (NWCWN) and ND4 (Urban Sustainable, Blue and Green Drainage Solutions).

Several points were made about location information, which was described as vague or ill-defined. The term 'initial focus' was queried, and it was suggested that, as drafted, it could be argued that any major development in Edinburgh constitutes a national development. It was suggested that the intended extent of Leith and Granton would be better expressed via a map or plan.

It was argued that a focus on Leith to Granton needs to be set in the context of the wider coastal environment, and that the potential for negative effects on landscape and seascape need to be addressed. It was noted that a detailed assessment of a number of internationally and nationally important natural assets will also be required at project stage. Other comments included that the area's biodiversity should be protected and enhanced; the Leith Dock Locks SPA was highlighted in particular.

It was also recommended that the mitigation measures set out in the IIA should be included and strengthened.

Designation and classes of development

Comments on designation and classes of development included that:

- In addition to development of new and/or upgraded active and sustainable travel routes, access to the foreshore should be accommodated.
- In addition to designating green and blue infrastructure as a class of development, reference the Edinburgh Nature Network should also be included.

Deciding when a proposal should be handled as a national development

As noted above, the location information currently provided was not thought to be sufficient.

ND18. Stranraer Gateway

Around 15 respondents commented on ND18. It was suggested that the text relating to Stranraer should have a greater focus on the quality of life, wellbeing, and sustainability of the town, and should include 20-minute neighbourhoods,

recreational areas, blue-green infrastructure and active travel. Highlighting and seeking opportunities to enhance Loch Ryan as a valuable natural asset was recommended, and the addition of habitat creation/enhancement to include provision for breeding shoreline waders was requested. It was also noted that development activity must be planned to avoid impacts to ancient woodland.

There was also a view that there is no justification for the regeneration of one town to be made into a national development.

Designation and classes of development

Comments on designation and classes of development included that:

- The relationship to STPR2 Recommendation 40: Access to Stranraer and ports at Cairnryan should be set out.
- There is no reference to active and sustainable travel connections to and within the area. Classes of development should more clearly support multi-modal transport infrastructure.
- Improved connections between Stranraer rail station and Cairnryan ferry terminals should be included. In particular, it was argued that a high-quality cycle route from Stranraer to Cairnryan would provide a sustainable travel option for both tourists and local people.
- Relocation of Stranraer rail station can play a key role in unlocking the East Pier for development.

It was also noted that Stranraer is being considered for the potential Cairnryan Border Control Post, which is the subject of a Scottish Government Special Development Order.

Question 21 – Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

Around 260 respondents made a comment at Question 21.

Many projects were suggested to be of national importance, or to merit national development status. Projects listed are grouped broadly by subject area, although clearly some could fall under more than one heading. Some respondents made a case for retaining the national development status of projects that were listed as such in NPF3 but are not listed as national developments in the draft NPF4. These are marked with an asterisk.

Suggested extensions and amendments to the 18 proposed NPF4 national developments have been noted in the analysis above at Questions 19 and 20.

Housing

- Delivery of new housing.
- Smart clachans.

- Self-build development.
- Housing for older people/housing with care.
- Demonstration projects to show how large-scale new places or settlements, with a high proportion of quality housing, can be delivered while achieving net zero/zero carbon aims.
- Retrofitting and adaptation of existing housing.

Repopulation

- A Western Islands and North of Scotland repopulation area.

Rural

- Rural development - understanding the specific needs of rural areas.

Agriculture/food

- Food production and security or food growing and harvesting.

Environment

- A mapped national Scottish Nature Network.
- Existing National Parks, and the creation of new National Parks.
- Control of invasive non-native species.
- Moray Forest.
- Moray Coast Natural Heritage Park.
- Perth – The Biodiversity Capital of Scotland.

Circular economy/waste management/materials

- Circular, sustainable management of Scotland's scrap steel in Scotland.
- National coordination of waste management infrastructure needs, and a plan for closing incineration plants.
- Transformation of sites on the Vacant and Derelict Land Register to deliver net zero and wellbeing objectives.
- A national programme for establishing Scottish materials and products supply, looking at the reuse of products, as well as the use of local materials.

Infrastructure

- Coastal defence civil engineering projects.
- Cross sector, catchment-wide initiatives to introduce natural flood risk management measures.
- Improved mains water supply.
- Communications resilience.

Transport/public transport

- STPR2.

- Decarbonising transport.
- Strategic Transport Enhancement.
- North West Strategic Transport Corridor.
- Bus Service Improvement Partnerships.
- Major public transport interchanges - making public transport more accessible and attractive for disabled people and the general public.
- Expanded, fully electrified rail network.
- Southern Scotland Transport Network, including extension of the Borders Railway.
- Reston Station.
- Glasgow Airport.
- Islands airports.
- Strategic airport enhancements.*

Active travel

- The Borderlands Project 'Destination Tweed' long distance path.

Roads

- Electric A9 project.
- Vehicle charging infrastructure.
- Toll of Birness junction improvements.
- Dualling of the A96.

Energy generation/transmission and storage

- Nuclear power and small nuclear reactors.
- Microgeneration.
- Wind energy development.
- Cromarty Firth as a key location for the development of Scotland's offshore wind industry and for an offshore wind hub.
- Tidal stream energy generation.
- Geothermal energy.
- Hydrogen development, regardless of location.
- Blackhillock sub-station and the proposed hydrogen corridor between Aberdeen and Inverness.
- Buckie Harbour servicing offshore wind farms.
- Coire Glas Hydro Pumped Hydro Storage Scheme.*
- Batteries.

Energy efficiency/transition

- Perth Smart Energy City Programme, aiming to make Perth one of the first UK cities to be net zero, using smart and off grid energy systems.
- Energy Demand Reduction.*
- The transition away from oil and gas in the North East.
- Large-scale adoption of renewable and low carbon fuels at a national level.
- District heating.

Ports and harbours

- Scapa Flow floating harbour.
- Orkney Harbours (as a standalone project rather than as part of ND7)
 - a) Scapa Deep Water Quay (Scapa Flow)
 - b) Orkney Logistics Base (Hatston).
- Transhipment Container Hub development project.
- Fraserburgh Harbour Masterplan.
- Freight on the Forth.*
- HMNB Clyde and the development of the Maritime Change Programme.

Historic assets

- Long-term maintenance and conservation of historic environment assets, especially (but not limited to) sites currently considered of national importance.

Specific developments

- West Edinburgh.
- Europark.
- South of Scotland NCIZ.
- Shawfair.
- Perth West and a Regional Logistics, Fulfilment and Business Innovation Park.
- Ravenscraig.*
- Redevelopment of Dounreay.
- Redevelopment of Longannet.
- Machrihanish employment zone.
- The cities of Aberdeen, Dundee, Edinburgh, Glasgow, Inverness, Perth and Stirling.

Science/technology

- Aerospace and space cluster around Prestwick Airport and the Airport.*

- The Moray Aerospace, Advanced Technology and Innovation Campus Moray Growth Deal Project.
- Spacehub Sutherland.
- Life/marine science cluster at Scottish Association for Marine Science, Dunbeg/Oban.
- Edinburgh Biomes at the Royal Botanic Garden Edinburgh.
- Ongoing funding for the Better Biodiversity Data Project.

Part 3 - National Planning Policy, Sustainable Places (Universal Policies)

To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions.

The following Universal Policies should apply to all planning decisions.

Question 22 – Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Around 390 respondents made a comment at Question 22.

Some of these comments were wide ranging, addressing issues covered in greater detail at subsequent questions in relation to Sustainable places. The focus of the analysis presented here is on the most frequently-raised themes, and in particular those which address the narrative on Sustainable places set out in the draft NPF4.

Many of those commenting simply expressed their support for climate change and nature recovery as the primary guiding principles for plans and planning decisions. These respondents referred to the planning system as having a key role to play in Scotland's response to the climate emergency. This was described by some as the key issue facing society at present, and there was also strong support for the emphasis on nature recovery and biodiversity in the draft NPF4.

Respondents highlighted planning decisions in relation to transport infrastructure, protection of natural areas, aquaculture, and renewable energy infrastructure as having a significant role to play in delivering climate and biodiversity policy objectives. There were specific calls for these principles to have greater priority in managing development for active travel, reduction in car use, and the delivery of renewable energy.

Comments in support of Policy 1 (Plan-led approach to sustainable development) also highlighted the role of the Place Principle in enabling planning to integrate climate change and nature recovery with other considerations, and ensuring a community-centred approach to spatial planning. Respondents also noted the importance of cooperative working for the delivery of nature recovery objectives, as set out in Policy 2 (Climate emergency) and Policy 3 (Nature crisis), and suggested that the Place Principle could support this. It was suggested that this could be strengthened by including clearer links with the role of Local Place Plans in community-driven spatial planning.

Some respondents sought clarity on how the guiding principles set out in Policy 1 (Climate emergency) would apply in practice across the planning system. This included questions around whether guiding principles should apply only to NPF4, to LDPs and/or to other plans. Some noted that the guiding principles would represent

a significant diversion from the policy drivers under which existing LDPs have been developed.

Respondents also sought clarity on how the principles of climate change and nature recovery are expected to influence individual planning decisions. Questions were raised around how these principles should be balanced with other planning considerations, and how potential conflict between the two principles should be resolved. These comments reflected a view that the draft NPF does not go far enough to achieve the scale of change required to deliver climate change and nature recovery policy objectives.

It was also suggested that the draft NPF lacks a coherent account of how the national policies will collectively support climate change and nature recovery and does not set out a clear mechanism for implementation of these principles. In addition to suggestions for stronger wording of specific policies, respondents called for climate change and nature recovery to be given greater weight in development management decisions. It was suggested that this is necessary to achieve the required rebalancing of the planning system. In this context, there were calls for guidance to support planning authorities in applying these principles, with some suggesting that a clear hierarchy is required, setting out how these, and other planning policies, should be balanced in practice.

Others saw a need for flexibility in the application of guiding principles, for example to allow other considerations to be given equal priority in planning decisions, where appropriate. This included specific reference to the potential for development proposals to require planning authorities to consider factors such as housing need, health and wellbeing, and economic growth, alongside climate change and nature recovery.

Some went further and suggested other considerations which they felt should be recognised by NPF4 as guiding principles alongside climate change and nature recovery. These respondents cited environmental, social and economic considerations as the three pillars of sustainability, noting that Policies 1, 5 and 6 (Climate emergency, Community wealth building and Design, quality and place) make clear that Sustainable places should include consideration of sustainable development and other social and economic factors. Some wished to see these considerations reflected in the approach to Sustainable places set out in NPF4. Various existing policies and plans were referenced by respondents as potentially relevant here, including the National Performance Framework, Housing to 2040, and the NSET.

Specific themes which respondents wished to see represented alongside climate change and nature recovery included health and wellbeing, ensuring sustainable economic growth, tackling poverty and reducing economic and social inequalities, addressing housing need, and protecting the historic and existing built environment.

Several respondents suggested other principles which they felt should be given primacy over climate change and nature recovery in the draft NPF4. This included

reference to the creation of sustainable places and sustainable economic development.

Policy 1: Plan-led approach to sustainable development

All LDPs should manage the use and development of land in the long-term public interest. This means that new LDPs should seek to achieve Scotland's national outcomes (within the meaning of Part 1 of the Community Empowerment (Scotland) Act 2015) and the UN Sustainable Development Goals.

Question 23 – Do you agree with this policy approach?

Around 360 respondents made a comment at Question 23.

Most of those commenting expressed their support for a plan-led policy approach, and the role of LDPs in guiding use and development of land in the long-term public interest. These comments included specific support for the role of LDPs in delivering national outcomes and for a plan-led approach in providing certainty for communities and developers. There was also support for the reference to the Community Empowerment (Scotland) Act 2015, and the potential for a plan-led approach to enable effective democratic involvement and accountability in the planning system. Some also highlighted the importance of the Place Principle in underpinning engagement with local communities and wished to see this referenced at Policy 1.

Some of those expressing support for the policy noted that the effectiveness of a plan-led approach is dependent on the quality of LDPs and other plans. There was reference to the importance of LDPs being supported by a robust evidence base (particularly in relation to climate change and nature recovery), being revised as circumstances change, and recognising that new, unanticipated sustainable development opportunities may arise over a 10-year plan period. Some also wished to see Policy 1 emphasise the primacy of LDPs, for example by making it clear that proposals which deviate from LDPs should be discouraged. It was also suggested that development proposals should be expected to reflect Local Place Plan aspirations.

In terms of its specific content, there were calls for Policy 1 to reflect the guiding principles of climate change and nature recovery, as described in the introduction to Sustainable development in the draft NPF. This included reference to the role of the environmental principles (precautionary, prevention of harm, rectification at source, and polluter pays) in delivering sustainable development. Others suggested that NPF4 focuses too narrowly on the environmental aspects of sustainable development and wished to see the policy highlight social and economic considerations, alongside environmental ones.

Citation of other relevant policy was also recommended, with respondents suggesting that this could add clarity to the policy, including through definition of key concepts and setting out detail on the national outcomes, and other priorities,

which LDPs are expected to reflect. Respondents referenced several documents which they wished to see referenced, including Development Plan regulations (and including reference to spatial themes and principles), SPP, the Land Use Strategy and the NSET.

Others wanted to see Policy 1 focus on key considerations for the delivery of sustainable development in Scotland, including suggestions that reference to the 17 UN Sustainable Development Goals is unrealistic. These respondents called for a tighter focus on measurable outcomes that can inform LDPs and local planning decisions.

Respondents also suggested that clarity is required on how NPF4 (and LDPs) will help to deliver national outcomes and sustainable development targets, including calls for detail on how the policies set out will be integrated and applied to local decision-making.

Some questioned the value of Policy 1 as currently drafted, noting that the policy does not add significantly to requirements already set out in legislation. It was also suggested that the policy is focused exclusively on the production of LDPs, contrary to the statement earlier in the draft NPF that Universal Policies should apply to all planning decisions. In this context, it was suggested that NPF4 should distinguish between policy principles (such as Policy 1) and the policies which are expected to directly influence the assessment of development proposals.

Others proposed that, as the first of the national planning policies, Policy 1 should be stronger and more definitive in tone than currently drafted, and that phrasing such as 'seek to achieve' and 'long-term public interest' is too open to interpretation. These respondents called for the policy to set out a more detailed account of how LDPs should ensure that development management reflects national outcomes and strategies, including specific reference to Scotland's NSET and energy policy, in addition to sustainable development objectives. This included several respondents calling for NPF4 to set out a presumption in favour of sustainable development, with some describing the existing presumption in SPP as unwieldy.

It was also suggested that the policy would benefit from a more detailed definition of concepts such as sustainable development, plan-led, and long-term public interest, the latter including suggestions that NPF4 should include reference to decision-making for the wellbeing of future generations. Some also questioned the definition of the purpose of planning as set out, in terms of the focus on the outcomes of the Community Empowerment (Scotland) Act 2015, and UN Sustainable Development Goals. It was noted that this is a narrower definition than that set out by the Town and Country Planning (Scotland) Act 1997, from which the primary clause of Policy 1 is taken. It was suggested that the broader statutory definition should take precedence.

Respondents were also looking for further detail on how communities will be able to shape the use and development of land in their area. The role of Local Place Plans was highlighted as a means of ensuring local communities are at the heart of a

plan-led approach, including the suggestion that NPF4 should provide clarity on where Local Place Plans sit in the planning hierarchy. It was also suggested that a plan-led approach should ensure the participation of communities in areas which do not have a Local Place Plan, including calls for a right for communities to appeal decisions contrary to LDPs.

Finally, concerns were raised around the resourcing of planning authorities to deliver a plan-led approach. This included a perceived need for additional resourcing and guidance for preparation and revision of LDPs, and to ensure local authorities can support community-led spatial planning.

Policy 2: Climate emergency

Question 24 – Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Around 410 respondents made a comment at Question 24.

a) Consideration of all development proposals should give significant weight to the Global Climate Emergency

Most of those commenting supported the policy objectives and the need to ensure that the climate emergency plays a sufficiently prominent role in NPF4. These respondents suggested that transformational change is required across the planning system to support the response to the climate emergency and deliver net zero targets. Several themes and NPF4 policies were identified as particularly important, including biodiversity, retrofitting and the reuse of existing assets, and the circular economy. It was also suggested that Policy 2 should do more to highlight the link between climate change and biodiversity.

Some felt that 2(a) is not strong enough to deliver the scale of change required and wished to see the climate emergency be given pre-eminence over other parts of NPF4. There were calls for 2(a) to state that all development proposals 'must' (rather than 'should') give significant weight to the climate emergency, including suggestions that any development which contributes to climate change or nature loss should be rejected.

Further detail was sought on how 2(a) will be delivered, including the methodology for assessment of development proposals against the policy. This reflected a view that the current wording is highly subjective – for example lacking detail on how 'significant weight' is to be defined – and does not include sufficient detail on how it will enable planning authorities to strike a planning balance in the assessment of development proposals. Respondents also suggested that LDPs should have a significant role to play in supporting climate and carbon policy targets, and wished to see 2(a) expanded to ensure preparation of LDPs gives significant weighting to the climate emergency, in addition to the assessment of individual development proposals.

Also in relation to delivery, it was suggested that NPF4 and associated guidance must be more specific about the criteria against which proposals will be assessed. This included calls for more detail on the low carbon technology that development proposals are expected to include, and also that proposals which contribute to delivery of carbon targets including the decarbonisation of heating, transport and power generation, should be supported.

There were also calls for NPF4 to make clear the range of development types to which 2(a) is expected to apply. For example, some questioned whether the policy was intended to apply to minor developments or permitted development rights. Respondents also wished to see recognition that developments will vary in terms of their potential to support a response to the climate emergency, and to minimise their adverse climate impact, and it was suggested that planning authorities should be allowed to take this into account. An associated view was that current planning policy can be a barrier to the retrofitting of historic and listed buildings.

Other points raised in relation to the delivery of 2(a) included:

- Impact acceptability should be assessed in the context of the predicted scale of a positive contribution towards emissions reduction, rather than these factors being considered separately.
- Further detail is required on the relationship between 2(a) and the presumption in favour of sustainable development at Policy 1 (Plan-led approach to sustainable development), and with the provisions of Policy 19 (Green energy).
- NPF4 should make clear that 2(a) will apply to any change of land use.
- Proposals should be required to identify suitable sites for the restoration of native carbon sequestering habitats.
- Concerns were raised around resourcing, particularly if the policy is expected to include relatively minor development, and there was seen to be a need for significant additional resourcing of planning authorities to avoid delays to planning decisions.

Some suggested that giving significant weight to the climate emergency in the assessment of development proposals should not be at the expense of other important planning principles. These respondents wished to see more detail on how 2(a) will be balanced with other considerations, such as deliverability and economic recovery.

b) All development should be designed to minimise emissions over its lifecycle

Comments on 2(b) included specific support for a focus on development seeking to actively reduce emissions. This was seen as a key element in the delivery of decarbonisation targets. In this context, it was suggested that minimising lifecycle emissions will be particularly important for transport infrastructure proposals, including new road building. Respondents suggested that there should be more

emphasis on the role of public and active travel, and the circular economy, in minimising emissions.

Some felt that 2(b) should be strengthened by requiring that all development 'must' (rather than 'should') be designed to minimise emissions. It was also suggested that the policy should include more positive phrasing to promote carbon negative development, for example by stating that where a proposal is assessed to be carbon positive over its lifetime, this should be given significant weight in the planning balance. There were calls for 2(b) to set out a clear position on issues associated with the assessment of emissions, including embodied carbon, development-associated carbon, and the creation of carbon sinks, through nature-based solutions. This included calls for emphasis on reducing embodied emissions relating to materials and construction processes.

Respondents also sought greater clarity to enable effective implementation of 2(b), with some suggesting that, as written, it is not suitable for inclusion in a development plan. There was a perceived need for specific criteria to support a consistent approach to assessment of proposals and to provide applicants with clarity on the evidence required. This included calls for further detail on whether, and how, 2(b) is expected to apply to minor developments, and what are national decarbonisation pathways.

Further detail was also sought on how emissions are to be assessed, noting that developers and planning authorities currently use a wide range of different measurement systems, which adds delay and uncertainty to decision-making. It was suggested that a standardised tool for measurement of lifecycle emissions is required to support implementation, although some felt that such a tool would sit more appropriately within Building Standards than planning policy. Several respondents expressed concern that the assessment of emissions must include whole-life assessment, taking account of materials, construction and energy use. However, others noted that the proposed changes to Building Standards focus only on operational emissions as lifecycle emissions cannot currently be measured with sufficient accuracy to support Policy 2(b).

Concerns were also raised around how the measurement of lifecycle emissions will be resourced. Respondents suggested that planning authorities currently lack the resourcing and technical knowledge to deliver this. However, it was also suggested that placing the burden on the applicant could disadvantage those who lack the means to carry out the measurement.

Some noted that the ability of residential developers to reduce lifecycle emissions is in part dependent on the ability of energy providers and the wider supply chain to deliver other aspects of decarbonisation. It was suggested that the supply chain for sustainable and local materials should be assessed to support delivery of 2(b). Respondents also suggested that some degree of flexibility is required, for example to ensure that any increase in construction costs to minimise emissions does not jeopardise delivery of other benefits, such as affordable housing targets.

c) Development proposals that will generate significant emissions should not be supported unless it is proven that the level of emissions is the minimum that can be achieved

Policy 2(c) was seen as vital to ensuring that planning can contribute to climate change and nature recovery. This included calls to make clear that emissions reduction is the primary objective, reflecting a perceived need to ensure that new development must not be allowed to contribute to climate change or nature loss.

Some expressed a view that further detail and guidance is required to ensure that 2(c) is implemented effectively. This included calls for the definition of key concepts such as 'significant emissions', and further detail on how planning authorities should determine that developments are in the long-term public interest.

In relation to the assessment of developments that will generate significant emissions, respondents saw a need for a standard methodology or tool to ensure consistency of approach across planning authorities. Some referred to the current carbon calculator and built environment carbon database as potential starting points for a whole lifecycle assessment methodology. Also in relation to emissions assessment, some suggested that 2(c) should link the definition of 'significant' to the size or type of development, while others wished to see it make clear that the magnitude of the sequestration of carbon should be a key factor in determining the balance of the planning decision. It was also suggested that assessment should incorporate: carbon associated with any demolition required for new development; emissions generated by transport to, and from, the development; its lifetime emissions from carbon-rich soils and peatlands; and end of life considerations.

However, concerns were also raised around whether an accurate whole-life assessment of emissions will be possible within the timescales available and based on the information provided through a planning application. Concerns were also raised that planning authorities do not currently have the resources, tools or technical expertise to support 2(c), and in particular to deliver whole lifecycle emissions assessment, and some raised concerns around the potential costs associated with implementation of 2(c) for planning authorities and/or developers. There was thought to be a need for an agreed mechanism or detailed guidance to support this assessment, with respondents noting that whole-life assessment is not currently possible in the absence of an agreed approach. Reference was made to guidance on carbon removal due to be published later in 2022, with calls for this to be reflected in the final NPF4.

Some respondents suggested that 2(c) should be further strengthened by not limiting opportunities for the approval of carbon positive developments. For example, some wished to see the inclusion of more positive criteria to prioritise development required to deliver carbon reduction targets, with specific reference made to renewable energy development.

Concerns were also raised around the inclusion of exceptions for viability of development or long-term public interest, and the use of emissions off-setting measures:

- Some wished to see 2(c) remove the reference to viability of development, expressing concern that this prioritised economic viability over climate impacts. It was also suggested that this part could lead to legal challenge on how viability is determined.
- Several respondents also wished to see the exemption for long-term public interest removed, suggesting that this could undermine the focus on climate change and nature recovery across NPF4. This also reflected a view that any development which contributes significantly, or moderately, to climate emissions cannot be in the long-term public interest. Questions were also raised around how long-term public interest should be defined, including suggestions that 2(c) should include an upper limit on carbon emissions beyond which considerations of public interest are insufficient to support a development.
- In relation to emissions off-setting measures, some wished to see 2(c) dissuade carbon off-setting, unless as a last resort. This included calls for NPF4 to set out a hierarchy of policies, noting that 2(b) requires developments to be designed to minimise emissions before any off-setting is considered.

Others suggested that emissions off-setting should be made a requirement (rather than a consideration) for any development likely to generate a significant volume of emissions, although some felt that it should make clear that off-setting cannot be used to justify proposals resulting in significant emissions. Concerns were also raised around the regulation of off-setting, including potential for off-site measures to lead to inappropriate tree planting. There was a view that the community affected by the development should be the recipient of mitigation.

Other comments reflected concerns that 2(c) should balance the level of emissions with other planning considerations in the assessment of development proposals. For example, some suggested that refusal of a proposal on the basis of the cumulative impact of multiple development proposals would be unfair if these are outwith the control of the developer. Questions were also raised around how cumulative impact will be assessed, including calls for clarity on which other proposals should be considered.

Some raised concerns around potential for supply chain issues and delays in development of technologies limiting the ability of developers to reduce emissions. This included a particular concern that an overly strict application of 2(c) could delay the delivery of required housing. On this basis, a phased approach to implementation of the policy was suggested.

Respondents also questioned whether all Environmental Impact Assessment (EIA) developments should be required to include a whole-life emissions assessment. It was suggested that local development could trigger the requirement for an EIA, but still have zero emissions. Others went further and suggested that the decision on whether an EIA should include whole lifecycle emissions should be left with the planning authority, rather than being set by national policy. However, some suggested that the assessment of lifecycle emissions should be extended to

include smaller developments, recognising that the cumulative emissions from these developments can be significant.

Other issues or concerns raised in relation to 2(c) included:

- An exemption should be made for national developments where the principle of development has already been established by NPF4 and a lifecycle emissions assessment has been completed.
- There was also a view that a whole-life assessment adds to a lengthy list of application requirements for larger scale development.

d) Development proposals for buildings, infrastructure and spaces should be designed to be adaptable to the future impacts of climate change

Comments at 2(d) included support for a focus on the climate adaptability of development, and for the reference to climate adaptation and mitigation measures for existing buildings. Some respondents noted that the adaptation of existing buildings will be essential to meeting Scottish Government net zero targets.

Some respondents wanted to see 2(d) strengthened, for example to include a reference to the consideration of biodiversity, and to incentivise emission reduction for existing sites. It was also suggested that 2(d) should require development proposals to set out how they will transition to net zero in the future, if they are not able to achieve it from the outset. Respondents also wished to see reference to renewable energy generation as an element in ensuring developments are adaptable to the future impacts of climate change, along with the retrofitting of existing buildings and brownfield redevelopment.

Some also wished to see a focus exclusively on adaptation for climate impacts and questioned the reference to mitigation in the draft NPF. For example, it was suggested that the reference to supporting proposals incorporating mitigation measures is inconsistent with the statement at 2(a) that development which generates significant emissions should not be supported.

Others suggested that 2(d) goes too far in its support for climate adaptation and mitigation. For example, the proposed presumption in favour of climate adaptation and mitigation to existing buildings was seen by some as too broad, and as failing to recognise that the reuse or adaptation of buildings may not be the most sustainable approach in all cases. This reflected a view that every site and opportunity should be assessed on its own merits to determine whether the reuse of buildings, new development on existing sites, or complete re-development is the most sustainable option. It was also noted that planning authorities must balance 2(d) against other planning policy and it was suggested that there should be links with other relevant parts of NPF4, such as Policy 6 (Design, quality and place) and Policy 7 (Local living).

Calls for further detail reflected a view that the policy lacks sufficient clarity to inform planning decisions. Respondents identified several issues that they wanted to be addressed, including:

- Providing a definition of future climate change impacts that development proposals are expected to anticipate, with some suggesting that these are likely to be highly variable and site-specific.
- Developing an agreed standard of ‘adaptable to the future impacts of climate change’ to ensure a consistent approach across planning authorities. Scottish Environment Protection Agency (SEPA) flood risk maps, IPCC assessment reports and the Committee on Climate Change publications were suggested as potentially relevant here.
- Ensuring that planning authorities can be confident that any refusal of applications on the basis that they are not adaptable to the future impacts of climate change will not be overturned.
- Clarity on how 2(d) relates to Building Standards and policies on emissions reduction for new buildings, and which agencies will monitor enforcement of the policy. Some suggested that adaptation for climate change was more relevant to Building Standards than planning policy.

Questions were also raised around the delivery of 2(d). These included calls for guidance on how planning authorities should assess the adaptation of existing infrastructure, ensuring that proposals are proportionate such that costs do not affect the deliverability of vital works. Respondents also noted that improvements in the evidence base to support the assessment of climate adaptation plans, for example in relation to coastal erosion and flooding, will be required. There was also thought to be a need for additional training to ensure planning authorities have the technical expertise to assess climate adaptation proposals. Some suggested that resilience and adaptation to climate change would be better delivered via LDPs, rather than through the assessment of individual proposals.

Comments also highlighted that adaptation for climate change impacts may be more challenging for some buildings, such as listed buildings, and in Conservation Areas and for heritage sites. These respondents sought clarity on how NPF4 policy will ensure climate adaptation of these buildings and sites is a priority. This included by addressing how climate adaptation can be balanced with heritage principles to avoid buildings entering decline.

Policy 3: Nature crisis

Question 25 – Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

Around 385 respondents commented at Question 25.

There was support for recognition of the nature crisis within NPF4 and for the emphasis on improving biodiversity. To ensure that the inextricable link between the climate emergency and the nature crisis is fully taken into account, it was suggested that Policy 3 should refer to Policy 2 (Climate change).

While some respondents argued that Policy 3 does not go far enough, others felt it goes too far. One perspective was that the policy should be strengthened further,

particularly with respect to the language used throughout and that, reflecting Policy 2, it should require planners to give significant weight to the nature crisis when considering development proposals. An alternative view was that more balance is required, including in relation to demand for renewable energy and housing. Some respondents argued that the approach should be more flexible, or more proportionate to the type and scale of development proposed.

There were calls for:

- The use of clearer and more consistent terminology, and for definitions including 'nature crisis', 'positive effects for biodiversity', and 'nature-positive' development.
- Clarity on methodology, and how impacts or mitigation are to be quantified. Development of a biodiversity metric to measure impacts was referenced.
- Guidance for planners and developers. A link to the new NatureScot 'Developing with nature' guidance was suggested, although it was also noted that this guidance applies only to 'local development'.
- Information on monitoring, including arrangements for monitoring long-term biodiversity impacts.
- Resources for local authorities to employ enough suitably trained staff to ensure a consistent approach.

With respect to additional content respondents would like to see included, or subjects that should have a greater focus, suggestions included:

- Creation of a Scottish Nature Network as a national development.
- Use of management plans for NSAs and SSSIs.
- Wider land management and strengthened links to the Land Use Strategy and future Regional Land Use Frameworks.
- Inclusion of the historic environment as a consideration.
- More focus on nature-based solutions.
- Reference to the concept of biodiversity net gain.
- Consideration of the role of transport in addressing the nature crisis.
- Recognition of biodiversity benefits from agroecological farming and crofting.
- Facilitating access to nature and greenspace through cycling and walking networks and paths.

Other issues raised included a view that Policy 3 is too high level, or that it reads more as a vision, or ambition, rather than a planning policy. It was also thought to be too long. Suggestions included that the policy could be condensed and simplified, or that more detailed sections could be included in other topic-specific policies rather than this Universal Policy. Combining Policy 3 with Policy 32 (Natural places) or cross-referencing between them, were also proposed. Several alternative titles were suggested including 'Tackling the Nature Crisis', 'Biodiversity Conservation and Enhancement' and 'Nature Positive Development'.

a) Development plans should facilitate biodiversity enhancement

Comments with respect to 3(a) included calls to strengthen the text so that development plans 'must' facilitate biodiversity enhancement. There were also requests to:

- Clarify what it meant by 'facilitate', and whether this includes scope to identify and protect spaces within a planning authority area.
- Explain the role of LDPs in promoting biodiversity enhancement in relation to other mechanisms such as Local Biodiversity Action Plans (LBAPs) or other green network strategies.
- Define the terms used, including 'priority species'.
- Provide implementation criteria.

While supporting the reference to nature networks, some respondents expressed concerns that there may be a fragmented approach or sought a clear delivery mechanism. In the absence of a National Nature Network there was a query around how nature networks fit together with LDPs, the Infrastructure Investment Plan (IIP) and RLUPs. It was argued that, as part of the spatial strategy in the LDP, planning authorities should be required to produce opportunity mapping-based nature networks.

Other suggestions included that:

- Interpretation of what nature networks might include would be helped by expanding the list in 3(a) and making clear that it is not exhaustive.
- Rather than focusing on a small number of 'priority species', a more holistic approach to biodiversity enhancement would consider all aspects of flora and fauna.

b) Contribute to the enhancement of biodiversity

At 3(b) there was again a view that the language needs to be strengthened. The need to define the terms used and to provide guidance was also highlighted, with a suggestion that the mitigation hierarchy (avoid, minimise, remediate, compensate) should be reflected.

Other respondents expressed concern that, as drafted, 3(b) does not take account of the scale of a project and could place significant burdens on development proposals. It was argued that, as at 3(d) and (e), the approach should be proportionate. There was also a view that, if a particular development has no impact on biodiversity, it would be unlawful to require it to contribute to the enhancement of unspecified and unrelated biodiversity.

Suggestions included that:

- 3(b) should be removed as it fails to take account of project scale, or that it is unnecessary as enhancement of biodiversity is already covered at 3(d) and (e).

- A biodiversity metric will be needed to determine the biodiversity baseline for a site, and then what enhancement would be reasonable.
- There should be greater flexibility in demonstrating the delivery of biodiversity enhancement, taking account of site and development characteristics. Potential for off-site enhancement should be clarified.

c) Impacts of development proposals on biodiversity, nature networks and the natural environment should be minimised

Comments on 3(c) included that some of the wording of this section is vague. Further suggestions included that what is meant by 'should be minimised' needs to be clarified, and that the mitigation hierarchy should be referenced. It was also argued that the need to 'reverse biodiversity loss' should be explained and, specifically, whether this is a reversal of loss from before development, or as a consequence of development. Reference to biodiversity net gain was also suggested.

Concerns were also raised including that:

- Current SPP says developments will be refused if they would have an unacceptable impact on the natural environment and what is proposed at 3(c) is a weaker policy.
- The policy appears to assume that biodiversity enhancement is best achieved through restoration. This might not apply in all cases, so simply referring to the 'enhancement of biodiversity' would be preferable.

d) Conserve and enhance biodiversity

In terms of the types of development to which 3(d) applies, suggestions included that:

- 'All national, major or EIA development' should be included. It was suggested that the text as drafted suggests the policy would not apply to national and major developments that are not EIA development.
- Development requiring an Appropriate Assessment can be very small scale, so it may not be appropriate for the requirements to apply in all cases. An alternative view was that reference to 'development for which an Appropriate Assessment is required' should be omitted, as this is not a development category.
- Proposals for developments on Local Nature Conservation Sites (LNCS) should be added, as they are currently a class that receives negligible protection from the planning system.

Concerns were raised that the requirements risk creating a complex and onerous system and that, to facilitate a streamlined approach, it should be a key principle that only one EIA is required throughout the planning process. It was argued that adding further assessments to the existing EIA process is likely to complicate and slow the planning process, without achieving better outcomes. It was argued that there should be a more proportionate approach, and that the proposals as drafted

could create challenges in terms of progressing nationally significant projects in relation to mitigating climate change.

As elsewhere in Policy 3, the need for tools to evaluate biodiversity in a consistent manner was highlighted. The Natural England Biodiversity Metric and Guidance was suggested as a potential model that could enable developers and planners to calculate biodiversity net gain for a development, and that requiring a percentage increase against set criteria would enable consistent application.

A frequently-made point at 3(d), and also at 3(e), related to the exclusion of application for farmed fish or shellfish development. Although this was welcomed by some respondents, the majority of respondents who commented on the exclusion (and all 'Local authority' respondents who did so) questioned or opposed this provision or argued that the reason for the exclusion is not clear. A respondent who agreed that the exclusion is appropriate, suggested this is necessary in light of the lack of guidance on how positive effects in the marine environment could be achieved. It was also argued that there may be other developments which are necessary in the public interest, but which cannot meet the policy test in 3(d), and that renewable electricity generation development should be given the same status as farmed fish or shellfish in this respect.

Some respondents commented on the requirement that biodiversity enhancements 'should include management arrangements for their long-term retention and monitoring, wherever appropriate.' It was argued that long-term monitoring and evaluation should be a policy requirement of every national, major and EIA development, and that monitoring should be mandated. It was also suggested that it should be made clear that the requirement as drafted would apply to areas in the applicant's ownership or control, and not to third party land.

With respect to the requirement to provide significant biodiversity enhancements, comments included that it is not clear how this will be measured or evaluated. Without a robust approach to measurement and evaluation, it was argued that the intention of this policy will be undermined by debate over implementation.

It was argued that there may be circumstances where the policy requires habitat connections to be created over land where applicants have no control, potentially making some sites undeliverable. Further clarity or flexibility was requested, including consideration of whether offsetting measures can be put forward to mitigate impacts if this is not possible within the site boundary.

It was also thought important that social and community impacts of biodiversity enhancement are considered, and that a reference to ensuring that biodiversity enhancement proposals are inclusive and equitable to the people affected by development should be added.

e) Enhance biodiversity

Comments on 3(e) included both that the approach is welcomed but also that the text is unclear. There was also a view that local developments should not

automatically be held to lower biodiversity enhancement standards by virtue of their classification under the development hierarchy regulations.

Other observations included that:

- There is no explanation of what ‘appropriate measures’ would be, although it was noted that the NatureScot ‘Developing with nature’ guidance will provide advice.
- The mitigation hierarchy is not referenced.
- The last sentence requires a caveat of being subject to the balance of other policies in NPF4.

Queries included:

- Why the requirement should be only to ‘enhance biodiversity’, rather than to ‘conserve and enhance biodiversity’ as at 3(d)?
- Whether the ‘scale’ will be for individual authorities to determine and what ‘in proportion’ would mean in practice?
- What ‘or fall within the scope of the policy above’ means?
- How contributions to ‘positive effects for biodiversity’ will be assessed in a tangible, measurable and consistent way?

With reference to the proposed exclusions, comments included that householder development should not be excluded; it was suggested that the policy could be reframed so that ‘householder developments will be encouraged to integrate nature-based solutions and deliver positive effects for biodiversity.’ As noted above, there was also a view that farmed fish and shellfish should not be excluded.

Policy 4: Human rights and equality

Question 26 – Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

Around 310 respondents made a comment at Question 26.

a) Planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality

Many of those commenting expressed support for the principle of promoting human rights and equality across the planning system. This included suggested amendments to strengthen the phrasing of Policy 4 to ensure delivery of its objectives.

Respondents also noted that existing legislation and regulation already requires public bodies to protect human rights and promote equality, including through the LDP preparation process. These respondents referred specifically to the Fairer Scotland Duty, the requirement to undertake Equality Impact Assessments (EQIAs), and the requirement to report on progress against equality outcomes.

Some described NPF4 as an opportunity to build on existing legislation, but many suggested that it is not an appropriate vehicle to meet these duties. This reflected a view that, as currently drafted, Policy 4 simply restates the duties set out in existing legislation. It was also suggested that respect for human rights and promotion of equality should be considered across all parts of NPF, rather than being limited to a single policy.

Many of those commenting suggested that further detail is required on how Policy 4 is to work in practice. There were specific calls for:

- Guidance on how planning applications are to be assessed against the policy.
- Detail on how 'discrimination' and 'equality' are to be defined.
- Clarity on how human rights are to be balanced against other planning considerations.
- Clarity on how progress against 4(a) is to be measured.

Some also wished to see further detail on which human rights are considered most relevant to the planning system. Respondents referred to human rights legislation, such as The Equality Act 2010 and Human Rights Act 1998, international human rights instruments such as the European Convention of Human Rights, the UN Convention on the Rights of the Child (UNCRC), and the Aarhus Convention. Specific human rights referenced included a right to: a healthy environment; housing; protection of property; respect for private/family life and home; and clean drinking water.

Respondents' concerns that Policy 4 lacks sufficient detail to enable the planning system to promote human rights and equality also reflected a view that change is required to ensure that planning decisions take better account of – and are seen to take account of – communities' views. It was suggested that a culture change is required across planning authorities, including by strengthening planning service resources and skills, to deliver meaningful engagement with communities.

As noted later under 4(b), this included a perceived need for guidance to inform approaches to community engagement. Some also saw a need for further guidance to ensure that communities have the same rights and opportunities as developers. This included specific calls for a right for communities to appeal planning decisions that are contrary to the LDP, and that any changes to LDPs should be subject to public consultation. Respondents also suggested that the policy will require ongoing monitoring of how well planning authorities and developers are engaging with communities.

Respondents also raised the following issues and suggested amendments to 4(a):

- Concerns that the application of human rights to the development control process could lead to excessive delays in the planning system and have a direct impact on delivery of housing.
- That planning decisions should also consider the human rights of communities around the world who are affected by industries supplying

materials to Scotland, and communities already suffering from the impacts of climate change.

- The policy to go further in recognising that planning and infrastructure impact different stakeholders in different ways. In addition to potential for engagement approaches to exclude some groups, there was also thought to be a need to consider how the built environment can promote equality.

b) All planning stakeholders have a responsibility to consult and engage others collaboratively, meaningfully and proportionately

Reasons for supporting 4(b) included a view that improvement is needed around how communities are engaged in the planning system. There was some concern that individuals and organisations can find the planning system very difficult to navigate, for example noting that individuals may find it difficult to find out what is being proposed in their area. Respondents also suggested that planning applications are often difficult to understand, and that people should have opportunities to contribute to a planning application without having to raise an objection.

In this context, some respondents felt that community engagement warrants a separate policy heading in NPF4. This reflected a view that 4(b) is focused more on stakeholder engagement than the promotion of human rights or equality. Respondents wished to see NPF4 set out more detailed policy to improve the approach to engagement with stakeholders. This included suggestions that, as currently drafted, 4(b) does not add to existing requirements for stakeholder engagement as part of the LDP preparation process.

Calls for further guidance had a particular focus on ensuring that approaches to stakeholder engagement are inclusive and consistent across different planning authorities and developers. They included:

- Specific calls for detailed guidance on recommended engagement approaches.
- Identification of key stakeholder groups.
- Providing examples to aid interpretation of 'proportionately'.

Respondents cited several sources as potentially relevant to the policy, with a particular focus on involving stakeholders from the early stages of development proposals, engagement approaches being accessible to all, and ensuring that engagement can result in meaningful changes to proposals. Respondents referred to increasing use of online engagement during the COVID-19 pandemic as an opportunity to diversify engagement in the planning system, although some wished to see further guidance on how developers and planning authorities should ensure that engagement does not exclude specific stakeholder groups.

Respondents also raised the following issues and suggested amendments for Policy 4(b):

- Concerns were raised that placing enhanced responsibility on developers to engage with communities could lead to delay or refusal of planning applications.
- It was suggested that Policy 4 should reference the current pre-application consultation process for major applications.
- Some members of the community are particularly likely to have difficulty engaging with the planning system. Young people, older people, those who are digitally excluded, women, those from more deprived communities, people with disabilities, ethnic minorities, people for whom English is not their first language, and those without the time to read and respond to lengthy planning documents were also referenced.

Respondents highlighted that undertaking effective stakeholder engagement can be highly resource intensive and suggested that consideration should be given to how planning authorities can be resourced to support this.

It was also suggested that planning policy could better support communities through the application of stronger weighting for community-led development proposals.

Policy 5: Community wealth building

Question 27 – Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Around 330 respondents made a comment at Question 27.

Respondents expressed concern that ‘community wealth building’ is not a well understood concept, including reference to differing interpretations across planning authorities and other stakeholders. Some noted that they felt unable to comment on Policy 5 in the absence of a clearer definition. Respondents also noted that interpretation of the term may vary across sectors, and most of those providing comment saw a need for the policy to provide an accepted definition of the term. This included a perceived need for specific community wealth building objectives, against which development plans and proposals can be assessed, and practical examples of how planning can contribute to these.

Some of those providing comment suggested potential definitions of community wealth building, including calls for 5(a) to reference social and environmental factors alongside economic development. Other suggestions included adding flexibility to enable the interpretation of community wealth to be tailored to local needs. There was reference to increasing community concern around the potential for inward investment (which may be able to demonstrate community benefits) affecting the sustainability of local communities.

Respondents also suggested that existing policy and legislation could provide the basis for a definition of community wealth building. This included reference to:

- Locality Plans and Local Place Plans.

- Local authority Capital Investment Programmes.
- Local social enterprise and community empowerment strategies.
- Outcome D of the Town and Country Planning (Scotland) Act 1997.
- Place and wellbeing outcomes.
- Scottish Land Commission guidance.
- Other parts of NPF4, such as Policy 16 (Land and premises for building and employment) and the policies under 'Liveable Places'.

It was also suggested that local community wealth building strategies or objectives may be required to enable LDPs to address identified community wealth priorities.

However, respondents also identified a range of specific considerations which they wished to see reflected in the policy. These included:

- Improving community resilience and reducing inequalities.
- Increased spending within communities.
- Ensuring use of local supply chains and services.
- Local job creation and providing training and volunteering opportunities.
- Delivery of community facilities and infrastructure, including connectivity.
- Supporting local circular economies.
- Delivery of more affordable and more energy efficient buildings for local communities.
- Supporting and enhancing cultural wealth.
- Improving biodiversity and wealth.
- Renewing democratic participation by putting communities at the heart of the planning process.
- Supporting community-led proposals, and enabling community ownership of buildings and assets
- Emphasising cooperation between communities, developers and other stakeholders

a) Development plans should address community wealth building priorities by reflecting a people-centred approach to local economic development

Many of those providing comment at 5(a) expressed support for the role of development plans in supporting community wealth building, and in particular the value of a people-centred approach to local economic development. Some noted that community wealth building is already supported by other legislation and policy, including, for example, the Statement of Community Benefit referenced at Policy 9 (Quality homes). These respondents questioned the need for an additional planning policy specifically focused on community wealth building.

Most of those providing comment suggested that 5(a) lacked sufficient detail to ensure effective and consistent implementation, with some noting that the draft

guidance on local development planning does not reference community wealth building. These respondents sought further detail on:

- Who is expected to identify and deliver community wealth building initiatives?
- How development plans are expected to take account of community wealth building?
- How the policy will be applied in planning authority decision-making, how development proposals should be assessed against Policy 5, including consideration of how this may impact the viability of proposals?
- How community wealth impacts should be measured?

There were calls for practical examples of how development plans, and the planning system as a whole, can support community wealth building. It was also suggested that planning authorities require guidance on how community wealth building is to be balanced against other planning policies and other duties on planning authorities.

Some raised concerns around the resourcing implications of the policy, particularly for planning authorities requiring to assess how development proposals can contribute to community wealth building. This included suggestions that planning services may have a relatively limited understanding of how planning can support this policy objective. Respondents also suggested that delivery of community wealth building is likely to require the cooperation of multiple stakeholders and may be beyond the reach of individual planning authorities. For example, it was noted that the delivery of community assets such as services, social and leisure facilities is likely to depend on relevant projects being brought forward by third parties. Some also suggested that communities will need support to become empowered and build confidence to engage with the planning system.

Respondents also raised the following issues and amendments relating to 5(a):

- Support for community wealth building should include greater weighting for, or a presumption in favour of, community-led development proposals.
- Allowing communities to identify Assets of Community Value could be a first step in supporting community wealth building.

b) National and major development proposals should contribute to community wealth building objectives

Consistent with responses to 5(a), many of those commenting on 5(b) called for further detail on how national and major developments are expected to contribute to community wealth building. This reflected a concern expressed by some that, as currently written, 5(b) lacks the detail required to ensure consistent assessment of major and national development proposals. Respondents also noted the lack of a clear definition of community wealth benefits, suggesting that this renders 5(b) 'unworkable' and will lead to uncertainty for developers around how they may be affected by the policy. Respondents suggested that this uncertainty will reduce the time that developers have to prepare for 5(b), and there was a call for further consultation on any revised version of the policy.

There were specific calls for further detail on the range of development proposals to which the policy is expected to apply. This included concern around how 5(b) would apply to smaller major developments, including residential and renewable energy proposals. Some wished to see minimum development size thresholds applied to policy 5(b), with 200+ units proposed for residential developments. Others suggested that the scope of 5(b) should be extended to include other development types, such as smaller housing developments and local non-householder development proposals. It was suggested that this could benefit local authority areas with few national or major developments.

Respondents also wished to see 5(b) give clarity to developers and planning authorities on the kinds of community wealth benefits that will be prioritised in planning decisions. This included suggestions that the production of local community priorities could help to inform how development proposals should contribute to community wealth building, as well as decisions on the viability of proposals. Respondents also wished to see NPF4 identify how each of the proposed national developments are expected to contribute to community wealth building.

Some also raised concerns about the potential impact of 5(b). This included reference to the potential for major development to be justified by community benefits (such as job creation), in spite of community objection. Respondents also noted that 5(b) would lead to a change in the current assessment of renewable energy proposals where community benefits are not currently considered to be a material consideration. There were some concerns about the legitimacy of this change in assessment of development proposals.

Respondents also raised the following issues and amendments for 5(b):

- Major development proposals should be required to include a community wealth building statement to demonstrate how Policy 5 has been considered.
- 5(b) should also consider how developments can be monitoring to assess how they have contributed to community wealth building.

Policy 6: Design, quality and place

Question 28 – Do you agree that this policy will enable the planning system to promote design, quality and place?

Around 310 respondents made a comment at Question 28.

Some respondents suggested that Policy 6 lacks clarity and will not provide the direction needed to ensure that design, quality and place are at the heart of the planning system. This reflected a view that transformational change is required to ensure the planning system promotes quality design and delivers successful places. These respondents saw a need for the policy to provide planning authorities with the confidence to refuse proposals on the basis of poor design, without fear of these decisions being overturned. In this context, respondents suggested that

Policy 6 would benefit from stronger wording, for example through use of ‘must be’ rather than ‘should be’.

Some also wished to see better integration with other NPF4 policies to reflect the link between design and the broader concepts of placemaking. This included specific reference to: infrastructure first; sustainable design; living locally and 20-minute neighbourhoods; green infrastructure; nature-based solutions; climate change adaptation; and biodiversity enhancement. The six qualities of successful places were also seen as fundamental to many of the national policies set out; it was proposed that Policy 6 should highlight where each of the qualities are linked to other parts of NPF4.

Respondents also sought clarity on the scope the policy, suggesting that it is less applicable to some development types, for example where it is not reasonable to expect developments to contribute positively to the character and sense of place of the local area. This reflected a view that Policy 6 is primarily relevant to housing development and other built environment proposals. Some saw a need to include exceptions, or otherwise make clear, that some development types are not expected to comply fully. There was specific reference to renewable energy, other infrastructure proposals, and aquaculture.

a) Development proposals should be designed to a high quality to contribute positively to the character and sense of place of the local area

Most of those commenting on 6(a) noted their support for the policy, including welcoming the focus on ensuring good quality design and the importance of design for quality placemaking. Some respondents suggested that considerations of viability and delivery can often over-rule quality of design, and there was a view that existing planning policy has allowed a large number of poor quality developments to be approved. Policy 6 was seen as important to addressing this, and respondents highlighted the need to ensure that the policy can effectively inform the assessment of development proposals.

However, respondents also suggested that the phrasing of 6(a) is too subjective, in particular the reference to ‘high quality’ design. It was suggested that further detail is required to support a clear and objective approach to design, and to ensure consistency across planning authorities. Respondents noted that policies 6(b) to 6(e) provide some of this detail and suggested that 6(a) should be re-framed as an overall statement of policy, rather than a policy that can inform development management.

The six qualities of successful places referenced at 6(c) were seen as having an important role in ensuring a consistent approach to good design, and there were calls for these to be referenced at 6(a). There were also calls for 6(a) to include:

- Reference to the guiding principles of climate change and nature recovery.
- An outline of other relevant national policy and strategy that supports prioritisation of good design.

However, respondents also highlighted potential inconsistencies between 6(a) and other NPF4 policies, for example noting that Policy 19 (Green energy) recognises that onshore wind development will require some landscape change that may not contribute positively to the area. In this context, some saw a need for further detail on the range of development types to which 6(a) is expected to apply.

In terms of specific elements of good design, respondents referred to a range of considerations, including factors relating to both the function of a place and to character and sense of place. Specifics included design for lifelong health and wellbeing, ensuring a nature-rich environment, consideration of biodiversity, consideration of landscape character, sensitivity to local built heritage, and sustainability of design. There were also calls for 6(a) to reference the role of communities in good quality design, and to support draft NPF Policy 4 (Human rights and equality) and Policy 5 (Community wealth building).

Respondents also saw a need for the planning system to ensure that high quality proposals are translated into quality developments. The role of Building Standards was highlighted here, and it was also suggested that planning authorities must be sufficiently resourced to support development enforcement. Some also noted that the assessment of development proposals against design principles is likely to require additional resourcing for planning authorities.

b) Development proposals should incorporate key principles of Designing Streets, Creating Places, New Design in Historic Settings and other design guidance

Comments in support of 6(b) included reference to the need for a consistent focus on quality design, to the importance of development proposals reflecting current design guidance such as Designing Streets, and to the access and inclusion aspects of a design-led approach. Respondents noted that the design guidance referenced has already been incorporated into local development planning and suggested this had been effective in informing local decision-making.

However, it was also suggested that some of the policies and guidance referenced at 6(b), such as Creating Places, Designing Streets and New Design in Historic Settings, are out of date and there was concern that 6(b) gives these such a significant role in planning policy. Respondents noted that there has been significant progress in design concepts and theory since the publication of the documents referenced at 6(b), and there was thought to be a need for other guidance to be updated alongside NPF4 to ensure that it better reflects NPF4's priorities. This also included calls for guidance to better reflect the rural context.

Some respondents also expressed support for the reference at 6(b) to other design principles and guidance adopted by planning authorities. There were calls for NPF4 to provide clarity on the status of this guidance for the preparation of development proposals, particularly in the context of Supplementary Guidance being removed.

However, others raised concerns around the reference to use of other design guidance adopted by planning authorities or statutory consultees, suggesting that reliance on a wide range of guidance could lead to slower and less clear decision-

making. It was also noted that the Scottish Government may have limited influence over the content of guidance adopted by non-governmental statutory consultees. There was said to be a need for 6(b) to be more specific about which design guidance should take precedence to ensure a consistent approach across planning authorities and provide certainty to developers.

There were also calls for NPF4 to clarify who will be responsible for determining the relevance of the design tools listed at 6(b) for individual development proposals. This included a suggestion that the Place Standard Tool should be made a requirement for major pre-application consultation. Respondents also wished to see further detail to ensure that a consistent approach to design will be taken across all planning authorities. This reflected a view that there has not been a consistent approach to design over the period since the guidance cited at 6(b) was published. It was suggested that 6(b) should be amended to require planning authorities to comply with the referenced design guidance.

In addition to the guidance referenced in the draft NPF, respondents also highlighted other policy and guidance which they felt should be reflected at 6(b). Several national policies were identified as relevant to design, including Policy 4 (Nature crisis) and Policy 20 (Zero waste).

Respondents also wished to see reference to:

- The guiding principles of climate change and nature recovery.
- The six qualities of successful places.
- Transport and active travel guidance, such as Cycling by Design.
- Green infrastructure design guidance, such as the Green Infrastructure Design Guide and Planning for Green Infrastructure.
- The National Roads Development Guide.
- The National Walking Strategy and World Health Organisation Global Action Plan for Physical Activity.
- Local Place Plans.

Reflecting points raised at 6(a), some respondents expressed concern that better resourced and skilled planning authorities will be required to deliver 6(b). This included a perceived need for greater recognition of the importance of design among planning officers and elected members, and Scottish Government support in relation to design and quality issues at planning appeals. There were also calls for reference to the role of Design and Review Panels to encourage design issues to be addressed at earlier stages of the development process.

c) Development proposals should demonstrate how the six qualities of successful places have been incorporated

Comments in support of 6(c) welcomed the detail provided on the six qualities of successful places, noting their role in supporting delivery of other NPF4 policies and national outcomes. There was particular reference to connectivity, creating

distinctive places, and protecting historic assets. Several respondents noted that the six qualities already inform their approach to development.

However, concerns were also raised that, as currently drafted, 6(c) may add to confusion and inconsistency of approach. Respondents felt that some of the language used, such as 'sense of joy', is too subjective, and questioned whether this could support a consistent approach to assessment of design. Some also noted that the six qualities represent a further layer of design guidance, in addition to that referenced at 6(b), and suggested that this could add to delays in planning decisions.

Respondents also noted that the six qualities of successful places have been in place for some time but suggested that this has not resulted in a significant improvement in the design and quality of development. It was also suggested that sufficient resourcing of the planning system will be important to enable planning authorities to properly assess proposals against the six qualities.

There was thought to be a need for further guidance to support a consistent approach to the application of the six qualities across the planning system, although there were also calls for guidance to allow sufficient flexibility to reflect local circumstances and needs, for example in rural areas. Calls for guidance included specific reference to:

- A need for more robust criteria for the assessment of proposals against the six qualities.
- Guidance on how developers are expected to demonstrate that the six qualities have been incorporated into the design of a proposal.

Scotland's Place and Wellbeing Outcomes were seen as a potential basis for guidance to support application of the six qualities of successful places. Respondents also saw a need for clearer links between 6(c) and other relevant parts of NPF4 such as Policy 17 (Sustainable tourism) and Policy 31 (Rural places).

There were also calls for clarity on the scope of 6(c), including suggestions that the requirement to demonstrate use of the six qualities should be limited to major and national developments only. Respondents recommended that planning authorities should be permitted to determine what would constitute a more proportionate design quality assessment for smaller developments. Some also wished to see 6(c) allow greater flexibility in the assessment of renewable energy and other proposals that support national outcomes, recognising that proposals which follow best practice design may not be able to fulfil all six qualities of successful places.

Respondents also highlighted points for clarification and suggested amendment to each of the six qualities of successful places. These are summarised below.

- 1. Designed for lifelong health and wellbeing. Respondents wished to see reference to the contribution that heritage and the historical environment can make to lifelong health and wellbeing, as well as traffic reduction and active travel. This included suggestions that development proposals should be required to provide for active travel and should seek to reduce car travel. It

was also suggested that, as presented at 6(c), the quality is too focused on active solutions to health and wellbeing, and respondents wished to see this expanded to include cultural and other activities to promote wellbeing and a sense of connection to a community.

- 2. Safe and pleasant. It was suggested that the quality should refer to the role of 'active frontages' in creating safe and welcoming environments.
- 3. Well-connected and easy to move around. There were calls for reference to shared transport and mobility hubs, and recognition that delivering well connected places may be a particular challenge in rural areas.
- 4. Distinctive. Respondents supported the reference to the importance of cultural heritage and the historic environment in shaping the approach to creating distinctive places.
- 5. Sustainable. Respondents sought further detail on how the design of developments can support the circular economy, including calls for practical examples and clearer links to Policy 20 (Zero waste).
- 6. Adaptable. There were calls for reference to the role of user-centred design to enable development to change and cope with changing needs.

Respondents also wished to see reference across one or more qualities to: 20-minute neighbourhoods; more generous living space for residential development; trees and woodland; and sustainable local food production. It was also suggested that 6(c) should require development proposals to include plans for long-term maintenance of any development.

d) Development proposals that are poorly designed, including those that are inconsistent with the six qualities of successful places, should not be supported

Respondents commenting in support of 6(d) welcomed the statement that development proposals can be refused on design grounds alone. These comments reflected a view that the six qualities of successful places are fundamental to delivery of other NPF4 policy, including particular reference to health and wellbeing, climate change and nature recovery, and circular economy principles.

Reflecting comments at 6(c), some respondents suggested that the phrasing of 6(d) is too subjective. There were calls for clearer criteria to clarify how 'poorly designed' is to be defined. It was also suggested that stronger wording – for example, 'must not' rather than 'should not' – is needed to ensure that the planning system rejects development proposals that do not reflect the six qualities of successful places. Some also wished to see 6(d) include a clear statement of the negative impacts of poor design on placemaking and NPF4 policies.

Some respondents questioned the need for 6(d) in addition to 6(c), and suggested that they could be merged.

e) Development proposals that are detrimental to the character or appearance of the surrounding area should not be supported

While most of those commenting supported the principle of 6(e), some saw a need for further clarity on what is considered 'detrimental to the character or appearance of the surrounding areas'. These respondents wished to see specific criteria to support assessment of daylight, privacy, noise and air quality impacts. It was also suggested that NPF4 should set out how development proposals should be assessed against 6(e) as a whole. There were calls for further guidance and practical examples.

Others referred to 6(e) as being too prescriptive in seeking to prevent any negative impact on local character or appearance. There was a thought to be a need for planning authorities to be permitted to balance consideration of 6(e) with other NPF4 policies. Respondents noted that some NPF4 policies recognise the potential for adverse impacts associated with some development types. Proposals for the reuse of brownfield, vacant or derelict land, industrial development and renewable energy proposals were cited as examples where exceptions or flexibility at 6(e) may be necessary. It was also suggested that NPF4 should ensure consistency between 6(e) and Policy 9 (Quality homes) in terms of the consideration of daylighting impacts.

Comments also referred to other impacts which respondents wished to see referenced, with some noting that the impacts listed at 6(e) are primarily relevant to residential development. These included impact on the heritage and historic environment, flood risk, and light pollution.

Part 3 – National Planning Policy, Liveable Places

Eight policies are included under the Liveable places theme.

Policy 7: Local living

We want our places to support local living.

Question 29 – Do you agree that this policy sufficiently addresses the need to support local living?

Around 380 respondents made a comment at Question 29.

Some of those commenting noted their general support for the ‘local living’ policy approach and the principle of 20-minute neighbourhoods. This included comments highlighting the contribution that this approach can make to delivering sustainable development, achieving the required modal shift away from private car use, and supporting local access to natural places. Several potential examples of 20-minute neighbourhoods were cited by respondents, including ongoing and proposed development.

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

Respondents sought further clarity on how the principles of 20-minute neighbourhoods are to be applied across different types of area. Some raised concerns that the policy could lead to the ‘over-centralisation’ of rural areas, potentially contributing to further depopulation of vulnerable remote rural communities. In this context, there were calls for recognition of the scale of challenge in adapting the principle of 20-minute neighbourhoods to some areas, and explicit reference to the additional support and investment likely to be required to deliver 20-minute neighbourhoods in more rural areas. Respondents called for greater flexibility to enable ‘local living’ to be realised in rural areas, and there were also calls for guidance on how local living and 20-minute neighbourhoods are to be balanced with other planning policies and considerations in these areas.

Others questioned whether the principle of 20-minute neighbourhoods should underpin Policy 7, particularly for rural and less accessible areas. The 20-minute threshold was seen by some as too restrictive, with alternatives such as ‘sustainable neighbourhoods’ suggested as being more representative of the principle of ‘local living’ for less accessible areas.

Some respondents expressed stronger opposition to the principle of 20-minute neighbourhoods, describing the policy as being overly restrictive on new

development, even in urban and more accessible areas. This reflected a view that residents may not be able to access the full range of social, health and economic requirements within 20-minutes in some urban areas, and that the policy could, for example, limit potential urban regeneration and the development required to support town centre recovery. In this context, some referred to the potential for the creation of 20-minute neighbourhoods through mixed use developments within and on the edges of communities, and suggested that facilities provided through residential-led development proposals could help to deliver 20-minute neighbourhoods in areas with limited existing amenities. These respondents wished to see policy amendments to enable this.

Many of those commenting were looking for further detail on what 20-minute neighbourhoods will mean in practice. These respondents noted that clarity is required on the concept of a 20-minute neighbourhood, when it is appropriate to apply it, and how it will influence development management decisions. Specific questions raised by respondents included how the 20-minute threshold will be measured, and how the term 'reasonably be expected' will be used in planning authority decisions. There was thought to be a need for further guidance to support the policy and address these questions, including calls for NPF4 to highlight the role of communities in helping to determine what 20-minute neighbourhoods mean for their local area. Reference was also made to other relevant planning policy. For example, links were drawn with the Place Standard tool and place and wellbeing outcomes, and it was suggested that the reference to a radius of approximately 800 metres is not consistent with the National Performance Indicator for access to green and blue space.

Concerns were also raised around delivery of the policy. For example, respondents suggested that some of the requirements set out are outwith the control of individual planning authorities, with health and education services cited as examples. Respondents highlighted the importance of coordination between planning policy and decisions on the provision of local services, and wished to see NPF4 provide mechanisms to ensure delivery of sufficient services and infrastructure to enable the delivery of 20-minute neighbourhoods. Reference was made to the potential role of the Place Principle in coordinating delivery of the policy and there were calls for further guidance to support a consistent approach across stakeholders and boundaries.

Other issues and potential amendments raised in relation to the principle of local living and 20-minute neighbourhoods included that there should be:

- A greater emphasis on the retrofitting of existing neighbourhoods to make them 20-minute compliant, including through guidance on how to address the range of planning considerations likely to be involved in delivering the necessary infrastructure.
- Recognition of the importance of local third sector organisations, community groups and community-led initiatives for the realisation of 20-minute neighbourhoods.

- Support for the significant public engagement likely to be required to shape the approach to local living and 20-minute neighbourhoods, including the necessary investment to support this.
- Greater prioritisation of active, public and other sustainable transport as a key element of 20-minute neighbourhoods.

a) LDPs should support the principle of 20-minute neighbourhoods

Some of those commenting expressed their support for the role of LDPs in supporting the principle of 20-minute neighbourhoods. This included calls for NPF4 to ensure LDPs are able to take account of the local context and characteristics of the area.

However, most of those commenting on 7(a) raised concerns or suggested amendment to the draft NPF. This included some who suggested that, as an LDP requirement, it is not appropriate for inclusion as development management policy.

Many of those commenting sought clarity around the weighting that LDPs should give to the principle of 20-minute neighbourhoods to enable planning authorities to balance their requirements with other considerations. These respondents raised specific concerns around potential conflicts between Policy 7 and a brownfield-first approach, or Policy 28 (Historic assets and places) on demolition of listed buildings. It was suggested that the assessment of proposals against 7(a) could be weighted on the basis of the number of the facilities listed at 7(b) that are included in the development.

b) Development proposals that are consistent with the principles of 20-minute neighbourhoods should be supported

Comments included welcoming clarity that the listed development types will be supported, and a suggestion that this part of the policy should ensure that the prioritisation of 20-minute neighbourhoods is applied to all development proposals.

Many of those commenting wished to see 7(b) strengthened, with phrasing such as 'should support' and 'consideration is given to' described as too imprecise for development policy. Suggested amendments included:

- Ensuring that any developments which do not support the principles of 20-minute neighbourhoods are rejected unless there are strong material considerations against this.
- Support for developments which incorporate additional sustainable transport infrastructure to support 20-minute neighbourhoods.
- That use of compensatory development to 'off-set' proposals which do not enable 20-minute neighbourhoods should not be allowed.
- That development should not be permitted to demolish or otherwise degrade existing facilities that contribute to 20-minute neighbourhoods.

It was also suggested that undeveloped 'legacy' developments from previous LDPs should be removed from current plans if they do not meet the 20-minute neighbourhood criteria.

There were calls for further clarity on how 7(b) will be delivered in practice, including concerns that NPF4 should ensure a consistent approach is taken across Scotland, especially since development proposals which are consistent with 7(b) may still conflict with other relevant planning policies. Some suggested that 7(b) lacks the detail required to support the assessment of development proposals, and saw the considerations set out as more suited to guidance rather than policy. Clarification was also sought on how planning authorities should determine what constitutes a 'relevant development proposal'.

Respondents also noted that 7(b) sets out a relatively large number of facilities required to constitute local living and suggested that clarity is required around how many of these should 'reasonably' be expected to be included. It was suggested that some of the facilities listed at 7(b) may not be feasible at a local level.

Other points raised in relation to several of the specific development types listed included:

- There was support for the role of public transport and active travel in 20-minute neighbourhoods and the contribution this can make to reducing unsustainable travel. Some wished to see a greater emphasis on the role of public transport and active travel. They referred to the importance of active and public transport links between 20-minute neighbourhoods and other areas. It was also suggested that NPF4 should include support for the decarbonisation of public transport and the need for electric powered public transport infrastructure as part of 20-minute neighbourhoods.
- In relation to employment, it was suggested that employers should be supported to facilitate appropriate remote working.
- Reference to the role of shopping for local living included calls for further detail on the types of shopping expected to be provided within 20-minute neighbourhoods; some made a distinction between food shopping (especially access to affordable healthy food) and other shopping requirements.
- Health and social care was described by some as a fundamental requirement for 20-minute neighbourhoods, including a suggestion that health and social care services should be recognised as essential infrastructure alongside energy, water, roads and education.
- It was suggested that reference to play opportunities should be linked to the role of greenspaces in 20-minute neighbourhoods.
- In relation to safe streets and spaces, there was specific support for the importance of enabling safe sustainable travel, with this seen as especially important to encourage more cycling.

Respondents also suggested amendments that cut across development types, including that:

- NPF4 should include clearer acknowledgement that ensuring a development forms part of a 20-minute neighbourhood may require changes beyond the

boundaries of the development, for example to ensure integrated transport networks.

- Other policy and guidance may be relevant to the application of this part of the policy, such as Open Space Strategies and Play Sufficiency Assessments.
- 20-minute neighbourhoods will require development to be inclusive of all parts of the community, including concerns around the potential segregation of affordable housing and meeting the needs of people with limited mobility.

Suggested additions

Respondents wished to see several policy areas given greater prominence including:

- An additional criterion should be introduced addressing how the concept of 20-minute neighbourhoods is to be understood in rural areas.
- Support for the principle of enabling people to 'age in place' and highlighting the importance of health and social care services as part of local living. This included calls for reference to housing with care.
- Opportunities to support low carbon transport and heat as part of local living, including supporting the emergence of local energy cooperatives and electric vehicle infrastructure.
- Greater reference to the importance of green space and networks for delivery of 20-minute neighbourhoods, including further coverage of multifunctional blue and green infrastructure, and the role of accessible nature in relation to 20-minute neighbourhoods. This included reference to relevant policy considerations around biodiversity and woodland.
- The importance of improved digital connectivity to support delivery of local living in rural areas.

Comments also included reference to specific types of development which respondents wished to see better represented. These included:

- Arts, culture and heritage as part of the 20-minute neighbourhood.
- Development proposals that support local food growing and allotments.
- Development that supports the creation of local circular economies.
- Green networks.
- Provision of blue and green infrastructure for climate resilience.
- Live/work units and hubs.
- Shared transport.

Policy 8: Infrastructure first

We want an infrastructure first approach to be embedded in Scotland's planning system.

Question 30 – Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure first approach to planning?

Around 345 respondents made a comment at Question 30.

Some of these respondents expressed their support for the infrastructure first approach set out by Policy 8. This included particular reference to supporting delivery of the infrastructure required by 20-minute neighbourhoods, providing an opportunity to improve active travel infrastructure, and reference to the importance of energy and other infrastructure for delivery of carbon reduction targets.

Most of those commenting sought further detail on Policy 8 and its parts, including a view that as currently drafted the policy lacks the necessary detail to deliver an infrastructure first approach. There were calls for a clear definition of 'infrastructure', including reference to the definition used in the IIP. In terms of specific types of infrastructure, respondents referred to transport (including active travel), communications, drainage, sewerage and flood defence, water and energy supply (including renewable energy and electricity grid infrastructure), space heating, green and blue infrastructure, natural infrastructure, public services (especially education and health), electric vehicle infrastructure, recreation facilities, and existing buildings. Some also saw a need for the prioritisation of specific types of infrastructure, including specific reference to infrastructure that contributes to carbon reduction targets.

Respondents also sought further detail on how the policy will be delivered, reflecting concerns around whether aspects will be achievable, and a view that further detail is required to enable effective delivery. It was suggested that effective delivery will require significant investment, both in terms of strategic infrastructure investment, including to increase electricity grid capacity, and to ensure sufficient resourcing of the planning system. Some wished to see further detail on how planning authorities are expected to cost infrastructure requirements and how large infrastructure projects will be funded, reflecting concern that development could be lost if there are delays in Scottish Government funding for larger projects which are not identified in LDPs. Respondents also saw a need for greater clarity on the continuing role of developer contributions, alongside other mechanisms for funding and delivering infrastructure.

Concerns were raised regarding the skills and capacity that planning authorities will require to support the infrastructure first approach, including to support engagement with developers in the production of development proposals. There were suggestions that planning authorities currently struggle to resource the enforcement of section 75 agreements for the delivery of infrastructure, and concern that Policy 8 will add to resource demands on those planning authorities. In addition to

resourcing, there was thought to be a need for additional mechanisms to enable planning authorities to leverage delivery of infrastructure.

To ensure an integrated approach to delivery, some wished to see stronger links between the policy and the spatial strategy. Reflecting the cross-boundary nature of some infrastructure, respondents also wished to see reference to the role of joint working across planning authority areas, between planning authorities and developers, for example to overcome challenges in designing development proposals that reuse existing infrastructure, and with those responsible for infrastructure to coordinate its delivery. It was suggested that a national body may be required to direct and coordinate infrastructure delivery.

Other issues raised included:

- NPF4 should better address forthcoming policy changes that are likely to affect delivery of this policy, including the infrastructure levy and changes in relation to land value capture.
- Current regulations do not always support an infrastructure first approach, for example in relation to energy infrastructure.
- Policy 8 should support the role of communities in choosing appropriate infrastructure for their area.

a) LDPs and delivery programmes should be based on an infrastructure first approach

Respondents supported the policy's focus on embedding infrastructure considerations in land use planning, including support for the role of LDPs in setting out infrastructure requirements at a local level, and the reference to the importance of aligning LDPs with relevant infrastructure plans and policies.

However, some noted that the success of an infrastructure first approach will depend on the specific content of these plans and policies, along with how they are translated at a local level. Respondents noted that the lack of detail on infrastructure plans and policies limited their ability to comment meaningfully on the draft NPF, and there were calls for further clarity on timescales for production of plans and policies. It was also suggested that the plans and policies listed at 8(a) may have different review cycles, potentially leading to issues of alignment with LDPs.

Respondents also highlighted the importance of clarity on infrastructure requirements for developers. It was reported that this feeds into certainty regarding costs and informs investment decisions. In addition to the infrastructure requirements associated with residential development and settlement planning, respondents also highlighted the importance of translating national infrastructure requirements at a local level. There were calls for the NPF4 to set out clearer links between national development and this policy, including by setting out criteria to ensure a consistent approach to delivery of strategic infrastructure.

The importance of up-to-date infrastructure capacity assessments was highlighted by some, including calls for guidance to ensure a consistent approach. Concerns were also raised around potential for LDPs and associated delivery programmes to become out of date as the evidence base evolves over the 10-year plan period.

Some respondents referred to the importance of 8(a) for housing development, including raising concerns that housing targets will require the effective delivery of Policy 8. There was a call for guidance to ensure effective implementation, including to support early engagement between developers and planning authorities, and coordination with the third parties that are responsible for the necessary infrastructure. Some suggested that the delivery of rural housing development may be particularly negatively impacted by 8(a), given the challenges around delivery of the necessary infrastructure in these areas. These respondents wished to see clearer support through 8(a) for infrastructure provision in rural areas.

Respondents also raised concerns around the potential for infrastructure requirements placed on developers to affect the viability of residential and commercial development, including reference to challenges in ensuring coordination with third parties, such as utilities, to ensure timely delivery of infrastructure. Respondents made specific reference to developers being required to deliver heat networks, with some suggesting that the infrastructure requirements associated with heat networks can add uncertainty and delays to development proposals. Comments on the role of 8(a) for developer obligations included reference to the potential for it to remove current flexibility in how planning authorities calculate developer obligations, for example if planning advice is revised over the life of the plan. It was suggested that this would limit scope for planning authorities to respond to change over a 10-year LDP period.

b) Development proposals that create an infrastructure need should demonstrate how they have taken account of the Investment Hierarchy

Comments in support of 8(b) included that a specific focus on making best use of existing infrastructure is welcome, although some thought that there could be greater emphasis on the reuse of existing infrastructure. This included a suggestion that the eventual decommissioning and recycling of materials from infrastructure projects should be considered at the planning stage.

Others raised concerns regarding the extent to which 8(b) will result in new development being focused around existing provision. For example, it was suggested that, in rural areas, a focus on poor quality or insufficient existing infrastructure could conflict with the development needs of local communities, and could potentially undermine rural repopulation and economic development objectives. It was also suggested that a focus on existing infrastructure may require more detailed evidence on the capacity of that infrastructure. Some also wished to see 8(b) ensure that the focus on existing infrastructure does not disregard the location of demand for development.

There was a call for clearer guidance on how development proposals should be assessed against 8(b), including calls for detailed assessment criteria. Respondents cited several examples of where they were unclear about how

proposals would be assessed against the Investment Hierarchy, including the adaptation of existing buildings and in relation to additional units on an existing non-residential site. It was also suggested that the Investment Hierarchy may not be sufficiently detailed to support assessment of local infrastructure requirements. Some suggested that LDPs could support 8(b) by setting out a framework for local infrastructure requirements that takes the Investment Hierarchy into account.

Other issues and suggested amendments highlighted included:

- NPF4 should highlight the role of planning authority investment plans in setting out how and when strategic infrastructure funding will be made available.
- Concerns regarding the skills and capacity required of planning authorities to assess development proposals against the Investment Hierarchy.
- That some planning authority level guidance does not permit planning obligations to be sought for the reconfiguration of existing buildings and infrastructure. There was a call for 8(b) to address this directly.

c) Development proposals that provide infrastructure identified as necessary by the LDP should be supported

Respondents raised concerns regarding the extent to which this part of the policy may be misinterpreted or misapplied. For example, some highlighted the potential for it to lead to development proposals being supported on the basis of a relatively small infrastructure contribution, even if they are contrary to other planning policies. It was suggested that additional guidance or criteria are required to assess the sufficiency of infrastructure contributions for 8(c), and/or that a requirement should be placed on LDPs to set out the types of development expected to contribute to identified infrastructure needs. Respondents also emphasised the importance of a range of critical factors being considered when assessing the suitability of development proposals, including calls for cross-referencing between 8(c) and other relevant parts of NPF4.

It was also noted that 8(c) places significant emphasis on the accuracy of LDPs in terms of identified housing targets and infrastructure requirements. Associated concerns included that LDPs could over-estimate infrastructure requirements on the basis of 'unrealistically' high housing targets, which could result in support for infrastructure proposals that prove unnecessary. Concerns were also raised around the potential for 8(c) to result in newly arising infrastructure needs not being supported, particularly where LDPs may not anticipate all future infrastructure needs. There was specific reference to the potential for renewable energy infrastructure requirements to change over the course of a 10-year plan, including through additional adopted policies and plans. It was suggested that national climate policy targets should take primacy over LDPs in relation to infrastructure requirements.

d) Development proposals should not be supported unless they mitigate their impacts on infrastructure

There was support for development proposals being required to mitigate their impact on infrastructure. This reflected concern that development to date has already resulted in demand outstripping infrastructure capacity across parts of Scotland.

Some respondents identified particular concerns around the capacity of schools, strategic transport links and other major infrastructure which are beyond the scope of developer contributions. Concerns about the use of developer contributions to fund infrastructure also reflected a view that some major infrastructure is required in advance of residential and other development, including cases where infrastructure can act as a catalyst for subsequent development. Respondents wished to see further detail on how these types of infrastructure will be funded, for example through the NPF4 delivery plan. It was also suggested that legal requirements on developer obligations need to be reformed to remove barriers to their use to deliver large-scale infrastructure.

Respondents also raised concerns about potential challenges in the delivery of mitigation for some development proposals. There were calls for further detail on how infrastructure provision will be funded where it is not possible or feasible for mitigation to ensure sufficient infrastructure capacity, for example where this requires input from national bodies such as Transport Scotland or Network Rail. Reference was made to the possibility that development proposals that are supported by other aspects of NPF4 and/or that LDPs may not be supported if the required infrastructure mitigation is not achievable. Some called for flexibility for planning authorities to avoid excessive infrastructure requirements that would undermine the viability of development proposals.

Some respondents were looking for further detail on how development proposals are to be assessed in terms of proposed mitigation approaches. They highlighted the need for clarity for planning authorities and developers in terms of the level of mitigation and developer contributions that are considered reasonable for different types of development. There were also calls for 8(d) to better recognise differences in the scale and nature of infrastructure challenges across urban and rural areas. It was suggested that the approach to mitigation of infrastructure impacts in rural areas should be tailored to local circumstances, and should support rural repopulation.

Some respondents questioned the relationship between 8(c) and (d). This included a suggestion that they could be merged or re-drafted to clarify the distinction between them.

Policy 9: Quality homes

We want to support the delivery of high quality, sustainable homes that meet the needs of people throughout their lives.

Question 31 – Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

Around 370 respondents made a comment at Question 31.

Comments were often lengthy, and the analysis below seeks to present an overview of the general themes raised, before moving on to consider each of the ten specific criteria in greater detail. Please note that all consultation responses are available to the Scottish Government.

A general observation was that the policy itself covers a very broad area, and that there may be a case for it being divided into more than one NPF4 policy. A specific suggestion was that it could be divided into a policy that is focused on quantity (equating broadly to 9 (a), (b) and (c)), with a second policy focused more specifically on quality.

Overall impact

In terms of the current overall approach, aspects that respondents liked included that there is more of a focus on deliverability than was said to be the case under existing policy. It was also suggested that the overall approach has the potential to reduce the variety of approaches taken across local authorities, if generally applied.

There was support for developing and adopting a robust methodology for assessing housing need and providing the land necessary, which was described as a core requirement of a functioning planning system. It was suggested that such an approach has been absent in the planning system in Scotland for too long, leading to a situation where the plan-led system was undermined, and planning decisions were delivered inconsistently on appeal.

A different perspective was that as drafted the policy contains a range of definitive statements, which if taken on their own, could be used to justify inappropriate development. It was suggested that as currently set out the policy opens up new routes through which the housing land position becomes harder to manage and also opens up the possibility of legal dispute. Connected to this was a view that Policy 9 needs significant alteration to be workable.

Housing to 2040 and other strategies, plans and regulations

A number of respondents noted the lack of reference to Housing to 2040, and there was a concern that it is not clear how NPF4 links to the ambitions of Housing to 2040. In terms of links and connections that need to be made and set out, there was also reference to:

- The recommendations from the Scottish Land Commission on housing delivery. It was suggested that there is an opportunity to embed these recommendations into NPF4 and to be more ambitious and innovative regarding housing delivery.
- Building Standards and the new energy requirements.
- The Heat in Buildings Strategy.
- A Fairer Scotland for Older People (2019), and the consultation on the Health and Social Care Strategy for Older People (2022).

It was suggested that links to wider government policy, including Housing to 2040, could be made more explicit if the policy's focus was on affordable and accessible homes. It was suggested that plans for housing development could be linked more explicitly to:

- The assessed needs of the population, including people with disabilities and older people.
- Local Health and Care Commissioning Strategies.
- Local Housing Strategies (LHSs).

Affordable housing and tenure-balance

Others raised issues about the tenure-based focus of the current draft, along with a concern that the new policy will repeat what were described as the failures of NPF3 to deliver affordable quality housing.

It was reported that additional housing is needed at every level of the market, and that this will be driven by private developers and the volume housebuilders but also by housing associations, local authorities and the third sector. It was proposed that the policy should reference encouraging, promoting, and ensuring delivery of homes across different tenures and by a range of providers.

One view was that a measure of success for this policy, and NPF4 as a whole, must in part be its ability to meet the housing need of those households who are struggling to access a social rented sector home. A different perspective was that, although affordable housing covers many types of homes, at its heart it is about social housing and only by increasing the supply of social housing in the right places can the housing emergency be addressed. There was a call for more of a focus on social housing, including through a firm commitment to increasing the social housing stock.

Connected to this position was the view that the success of Policy 9, and others in NPF4, must be measured against its ability to deliver enough social rented sector homes to meet existing and future demand, as well as ensuring those homes are of high quality, affordable, secure and sustainable. An associated point was that NPF4 should indicate how the Housing Need and Demand Assessment (HNDA) requirements are to be considered, particularly when they point to a significant proportion of the identified need and demand being for affordable housing.

In terms of ensuring that the right type of homes are delivered in the right places, it was suggested that LDPs should allocate land for specific tenures including social, affordable, self-build and community or public-led housing only.

Sustainability and net zero

A number of comments considered what is meant by 'sustainable homes' and it was suggested that the 'sustainable' aspect of this policy needs more thought if it is to deliver climate and nature-friendly housing. There was a concern that the draft NPF has not recognised sufficiently that construction contributes to carbon emissions and also has a significant impact on biodiversity.

Rather than what was described as a slightly modified 'business as usual' approach, there was a call for a more transformative approach to find the most effective way of delivering the homes needed while also prioritising the climate and nature emergency.

It was noted that new housebuilding, the infrastructure required, and the subsequent use of new homes will all generate emissions, however well they are designed, but that if badly planned they will generate even more. Given this, it was seen as concerning that housing seems to have been excluded from several of the conditions relating to climate and biodiversity covered at Policy 2 and (Climate emergency) and Policy 3 (Nature crisis). Further comments included that:

- It is not clear how overall climate emissions from housing delivery will be assessed, other than on a partial per development basis under Policy 2 (c) relating to development proposals that will generate significant emissions. It was suggested those aspects of Policy 2 (c) which are applicable to proposed housing developments should not include exemptions on grounds of viability.
- Policy 9 needs to include direct reference to the need for new build homes to be energy efficient, in line with the New Build Heat Standard. Reference should also be made to Policy 11 (Heating and cooling).
- It appears that it will be left to local authorities to determine at the LDP stage when the emissions from existing provision – including through the retrofit and refurbishment, using empty homes and the reuse of brownfield sites – should be considered.
- There should be a policy requirement in NPF4 requiring LDPs to carry out an assessment of how housing needs can be achieved using the least damaging sites and lowest means of climate emissions, using a combination of retrofit, renovation, conversion and new build.

Other comments about existing buildings and infrastructure and the use of brownfield included that:

- Policy 9 should recognise and encourage a significant contribution to housing targets to be made by existing empty homes, or buildings not currently used for residential purposes, being returned or converted to use as homes. This approach would be far more in keeping with other policies on circular economy and 20-minute neighbourhoods and would have the benefits of reducing carbon emissions through embodied energy and reducing construction waste. It would also protect other land uses such as agricultural land.
- A new policy of building reuse first should be developed. It was noted that building reuse is referenced in Policy 27 (Town centre living) and Policy 28 (Historic assets and places). However, it was suggested that a clearer steer is required around addressing the embodied energy and carbon in existing buildings, including not just when their previous use is no longer viable.
- Prioritising brownfield development should be front and centre of Policy 9.

Other sustainability-related points made included:

- The policy needs to acknowledge the high levels of fuel poverty, and the below tolerable standards associated with some of Scotland's housing stock.
- Any measure for sustainable homes must include water efficiency, consumption, and sustainable drainage. Sustainable metrics for homes need to include measures to address future pressures from climate change on water, drainage and flood risk. The policy also needs to cover water consumption, grey-water recycling, and the management of surface water through plot, street, and development level implementation of SuDS.
- As flooding is forecast to increase, safety from its many impacts must be a key consideration. The connection was made to homeowners being able to access affordable mortgages and insurance, and it was suggested that a precautionary approach should be taken around development in an area of possible flood risk.

Clarity of terms and definitions

Finally in terms of general themes, it was suggested that Policy 9 contains several ambiguous or unclear terms. Examples given included what is meant by good quality homes, minimum standards, targets and requirements?

There was a concern that imprecise wording, as it relates to the delivery of housing, may contribute to issues in LDP preparation and implementation. The lack of clarity around some of the terms used, such as 'long' or 'longer term', 'an identified need' in relation to affordable housing, and 'progress to delivery', was seen as potentially problematic.

a) Identify a housing target for the area it covers, in the form of a Housing Land Requirement

Please note that issues associated with the specific Minimum All-Tenure Housing Land Requirement for each planning authority are covered at Question 57, Annex B - Housing numbers.

General comments at this question highlighted some fundamental concerns about the intended approach. Reflecting some of the issues raised above in relation to tenure-balance, it was suggested that trying to deliver affordable housing by allocating generous amounts of land for all-tenure housing is flawed. It was noted that the MATHLR figures are described as a Minimum Housing Target, with the rationale being that there may be a need to identify more housing land than is expected to be required. This was described as an inefficient, speculative model that will not deliver the affordable homes we need. Further concerns included that:

- The current MATHLR figures in Annex B appear to have been developed without consideration of the most sustainable, low emission means of delivering better and appropriate housing for all who need it.
- The requirement for such a large margin for 'generosity' makes it harder to efficiently target infrastructure investment, and seems to be based on an assumption of permanent development and growth that is incompatible with the climate and nature emergencies.

It was suggested that there is an urgent need to reconsider our current models of housing development and to explore more land and resource efficient models that can that result in more accurately and effectively planning.

Other concerns focused on the specifics of the MATHLR and included that it is set far too low. It was suggested that the HNDA tool that was used fails to capture the housing needs and demand of significant portions of society. As an alternative, it was proposed that household surveys should be used in order that the current trend-based model of housing projections is supplemented with real world evidence.

There was also a fundamental concern that the MATHLR methodology is not appropriate for low volume build, low populous areas like the Outer Hebrides. In particular, there was a concern that it does not allow for ambitions relating to sustainable economic and population growth to be taken into account. It was suggested that MATHLR needs to make allowance for local authority policy aspirations and population initiatives.

There were also reservations about how the approach will work in areas of pressured market demand but where there are environmental and other constraints. It was suggested that 9(a) should not constrain the ability of planning authorities to set a Housing Land Requirement appropriate to local circumstances, and that the reference to 'minimum' should be removed.

Others were more broadly supportive of the approach, although there remained some doubt about whether this policy will reduce the debate on the Housing Land Requirement, including around how much flexibility LDPs may need to have 'built-in' to cover a 10-year LDP cycle and how the housing land supply is measured.

Some of those offering support were nonetheless looking to have certain points clarified or changed. These included:

- It would help to clarify whether the housing targets are the number of houses expected to be built, or the land that is potentially suitable should demand materialise.
- The term 'target' should not be used. If LDPs are to allocate land to the level of the Housing Land Requirement, that should simply be stated.
- There should be a reference to HNDAs, or alignment with LHSs, as the main basis for considering additions to the Housing Land Requirement. The LHS will provide the housing target, the LDP will identify sites to deliver it. It was suggested that LDPs could refer to and signpost the 'latest LHS housing target'.

It was also suggested that the MATHLR process does not recognise the role of regional and local housing markets sufficiently, including how markets operate across boundaries. There was also a concern that the policy as set out may restrict local authorities to only planning to meet the Housing Land Requirement within their boundaries, rather than across any Housing Market Areas of which they are a part. Equally, however, it was seen as important to ensure that local authorities do not

defer meeting a requirement to the regional level. There was a view that Regional Spatial Strategies should play a role.

'At least' meeting MATHLR

There were a number of comments specifically about the reference to identifying land to 'at least' meet the 10-year MATHLR.

One perspective was that this places a focus on identifying a requirement beyond the figures set out in NPF4, by seeming to assume that the outcomes of the HNDA process will highlight a greater level of need. There was a concern that debates and appeals could focus on how many additional homes should be provided for on top of MATHLR, and it was suggested that it should not be possible to challenge an LDP on that basis.

A different perspective was that the reference to 'at least' will encourage local authorities to identify the MATHLR as the actual Housing Land Requirement. The associated view was that it would be preferable for them to both go beyond the requirement and to plan for beyond 10 years. It was suggested that there should be a 15 to 20-year requirement, and that a reserve of deliverable sites should be maintained. It was proposed that these sites could then come forward earlier if the housing land pipeline under-delivers. A connected point was that there is no mechanism to trigger a review of the Housing Land Requirement if under-delivery is a persistent issue.

b) A deliverable housing land pipeline should be established for the Housing Land Requirement

Comments included that rather than 'pipeline', the policy should refer to 'supply', as this is a technical term that relates to established planning procedures and policies.

Many of the comments about the housing land pipeline were looking for further information or clarification about how various aspects of 9(b) are expected to work in practice. General concerns included that what is proposed is somewhat vague, with specific queries including:

- What is a deliverable housing land pipeline? Further definition and clarification would be welcomed.
- Whether establishing the housing pipeline would be a one-off exercise, or is expected to be an annual process similar to that used for the Housing Land Audit?

In terms of general concerns about how the approach might work, the following were raised:

- 9(b) does not acknowledge the role of developers in delivering homes. It was noted that local authorities do not control the rate of housebuilding other than for their own developments. It was suggested that the wording needs to be changed so as not to impose a requirement on planning authorities that is not within their remit.

- It is not clear how the housing land pipeline timescales would work where the market conditions lead to the delivery of homes through a build to order process. There should be recognition that the pace of delivery of sites cannot be determined by planning authorities.

An alternative perspective was that 9(b) will not succeed in achieving the overall objectives of Policy 9, including because it will not address what was said to be a persistent failure of many LDPs to allocate enough deliverable housing land to meet need and demand. It was reported that this has been a source of tension and challenge between home builders, local authorities and the Scottish Government, and it was considered critical that NPF4 contains provisions which both encourage the delivery of housing, and enable the release of more land if not enough is being delivered by an LDP. There was a concern that the draft NPF is not sufficiently clear or strong to ensure this is addressed.

A specific concern was the policy does not recognise windfall sites as a formal mechanism for the delivery of housing. It was reported that windfall sites can have a particularly important role to play, especially in some rural areas. The role of self-build sites was also noted. It was suggested that the role of windfall and self-build sites needs to be acknowledged.

Short-, medium- and long-term sites

A number of comments addressed the reference to short-, medium- and long-term sites, sometimes in order to request definitions for what is meant by each. Clear definitions were seen as key to achieving consistent practice across the country. Other points or queries included:

- Which of the timeframes set out would contribute to the 5-year effective housing land supply, or is that no longer a consideration? There was an associated query as to whether the lack of reference to an effective 5-year land supply is intended.
- Can allocations be considered appropriate if they do not meet the 20-minute neighbourhood criteria? It was suggested that this would be particularly challenging in a rural context.

There was also a concern that the currently proposed system risks encouraging local authorities to push back the programming of sites to later in the effective period. A suggested alternative approach was to have four groups of sites as follows:

- Immediate term sites: to be commenced in 1-3 years. Includes sites with full planning permission that should be allocated in the adopted LDP.
- Short term sites: to be commenced in 4-6 years. Includes sites with planning permission and allocations supported by masterplans, site briefs or equivalent and should be allocated in the adopted LDP.
- Medium term sites: to be commenced in 7-10 years. In locations that align with the spatial strategy. Should be allocated in the adopted LDP.

- Long-term sites (safeguarded land): To be commenced after Year 10. These sites align with the Site Assessment Methodology, are either free from constraints, or can be made free from constraints, and are available to come forward earlier if needed.

Locations identified beyond the plan period

There were also queries about the meaning and intention of the reference to ‘locations that may be suitable for new homes beyond the plan period’. They included:

- What status would these sites have and what level of scrutiny during the plan preparation process do they require?
- Is this an absolute requirement, and if so what amount of land is to be identified? It was thought that the use of ‘can’ rather than ‘must’ suggests that it is optional. Clarity was sought as to when, and if, such sites should be identified. The associated suggestion was that it should be at the discretion of the local authority and that there should be no obligation or specific target.
- There will need to be precision on how it will be determined that a deliverable site is no longer deemed to be delivering as expected, and therefore other longer term sites should be brought forward.
- Is the mechanism for bringing forward sites to be initiated by the planning authority through an LDP review, or could developers simply apply for permission on longer term or even unallocated sites at any time arguing the ineffectiveness of allocated sites?

There was also a concern that a mechanism to bring forward sites is open to misuse, with sites being drawn down prematurely and potentially undermining the delivery of existing allocated sites. It was reported that many sites do not progress to delivery as programmed because factors outside control of the planning authority can get in the way, especially for larger complex sites. It was suggested that bringing forward other ‘longer term deliverable sites’ early may further hinder progress. It was seen as important that the approach does not inadvertently disincentivise the delivery of short- and medium-term sites, particularly if the latter sites are the more difficult to develop or are less marketable.

An alternative view was that the current policy is extremely limited with regards to the sites which can be brought forward to resolve under-delivery. It was proposed that if medium- and long-term sites from the pipeline do not address the delivery timeline, then non-identified sites should have to come forward. It was also suggested that 9(b) should be amended to require LDPs to include information on the housing land pipeline relative to the Housing Land Requirement.

Site de-allocation

While some gave their support for the removal of sites where they are no longer deliverable, there were also notes of caution. These included that:

- The ability to remove sites on an ad hoc basis does not seem to accord with the objective of giving stakeholders certainty over the plan period.

- There may be cases where sites stall, or become ineffective, but should not be treated the same as undelivered sites. It was reported that sites are dynamic, and deliverability can be affected by a number of factors beyond the control of the planning process, including the strength of the housing market and the developers' own timescales. It was said to be not uncommon for a site to go from being effective to non-effective and back to effective again.
- Finding alternative sites in some rural settlements may be difficult, as constraints such as marketability could be as applicable to the new site as it was to the site being de-allocated.

In terms of how any approach is expected to work, comments included that:

- It is unclear what mechanism the Scottish Government is proposing and whether this would be some form of formal de-allocation process, or if it would be a matter to be addressed in a review of an adopted LDP.
- It is not clear where the burden of proof will lie. Will it be for developers or landowners to effectively 'prove' their sites are deliverable, or will it be for local authorities to conduct more rigorous assessments of all of the sites within their boundaries? If the latter, it was suggested that guidance will be required to ensure that sites are assessed on a consistent basis.
- A number of practicalities need to be considered, including timescales involved, evidence required and the right to appeal.

It was noted that the draft Local Development Planning Guidance (paragraph 475 regarding Delivery Programmes) states that de-allocation should be considered by way of an amendment or review of the plan. It was thought that as the guidance does not have the status of NPF4 as a material planning consideration, and indeed because the reference is made only in relation to delivery programmes and not the preparation of LDPs themselves, there remain concerns.

Managing the development pipeline

General observations included that further clarity on how the Delivery Programme and Housing Land Audit are to be used to manage the development pipeline would be welcome. Further comments included that monitoring could be undertaken annually alongside the Housing Land Audit process. It was hoped that this approach would ensure that local authorities have a consistent and transparent approach to monitoring housing land pipeline sites.

It was also suggested that the reference should be to the Delivery Programme and Housing Land Audit being used to 'monitor' not 'manage' the development pipeline.

c) Sustainable locations that create quality places to live

Those who commented specifically on 9(c) often noted their agreement, with reasons including that the principle of a tailored approach to housing for rural and island areas is supported. However, there was a question about how the requirement for land to be allocated in sustainable places ties up with the aim of repopulating rural areas. It was suggested that these areas are never going to be 'sustainable' if the spatial strategy favours most development being in the largest population centres.

There was a concern – which was also raised in relation to 9(f) below – relating to the need to ensure the housing needs of older and disabled people are met. The suggestion was that it will be difficult for planners to interpret 9(c) and (f) when scrutinising residential proposals; this may then conflict with one of the outcomes for NPF4 set out by the Planning (Scotland) Act 2019 that it meets ‘the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people.’ These issues are picked up again at the analysis relating to 9(f).

Suggested changes or additions to this part of the policy included that:

- A clear definition of ‘sustainable locations’ needs to be included.
- It should acknowledge that sites also need to be allocated where there is market demand, and they are potentially deliverable.
- There should be a stronger and more explicit statement prioritising brownfield sites over greenfield.
- Diverse needs and delivery models should be taken into account across all areas, including when allocating land to ensure provision of accommodation for Gypsy/Travellers and Travelling Showpeople.

It was also noted that there is currently a planning advice note (PAN) that covers site assessment, and there was a question as to whether 9(c) is intended to replace it.

20-minute neighbourhoods and infrastructure

A number of comments addressed 20-minute neighbourhoods and an infrastructure first approach, sometimes referring back to their comments under Policy 7 (Local living) or Policy 8 (Infrastructure first).

Relating back to 9(b) above, there was a query as to whether currently allocated sites should be de-allocated if they cannot meet the 20-minute neighbourhood principles? There was also a question about how the approach to allocating land to ensure provision for Gypsy/Travellers and Travelling Showpeople (discussed further below) fits with the 20-minute neighbourhood approach. Other comments relating to 20-minute neighbourhoods included that it may not be practical for all sites, or if there is a need to retrofit facilities and services into existing established residential or urban areas and where available space is at a premium.

In relation to transport infrastructure, it was noted that where people live is a key determinant of their travel needs and behaviours. It was suggested that direct links should be made between Policy 9 and the other policies that support reducing the need to travel and making the best use of existing transport networks.

Further comments included that 9(c) should refer to the need to identify and explicitly state the requirement for climate adaptation infrastructure and nature recovery action. It was suggested that this should be set out early enough to ensure that developers account for these components in the costs of land acquisition and development.

Gypsy/Travellers and Travelling Showpeople

A general observation was that in providing an apparent 'presumption' in favour of development where appropriate tests are met, the Scottish Government is adopting a strong and commendable approach which recognises the distinct needs of the Gypsy/Traveller community. It was suggested that this also provides a good basis to inform forthcoming LDPs and other corporate and local Community Planning strategies.

However, there was also a call for the policy to be strengthened and for support to be given to local authorities in ensuring the provision of sufficient public and private sites in a place-led manner. It was suggested that it would be helpful if planning authorities are required to make such provision for Gypsy/Travellers by the Scottish Government; this would address the current situation where it was said to be apparent that some planning authorities do not do so, either at all or adequately.

There was reference to the need for specific housing need appraisal work, or for it to be made clear what mechanism is to be used to identify need and deliverable land. The concern was that the HNDA is a blunt instrument inappropriate to this requirement, and it was suggested that assessment is best carried out at a national, or at a minimum a regional level, to take travelling into account. It was also noted that the identification of appropriate quality sites must be undertaken in consultation with the travelling community.

There was a concern that the allocation of land cannot ensure the provision of accommodation; it only provides the potential opportunity, but LDPs cannot deliver these sites without the actions of others. Further points included that:

- Experience of including allocated sites within LDPs has shown that both the development industry and landowners have been resistant to the inclusion of gypsy/ traveller pitches within identified development sites.
- Provided there is a housing need, there should be a clear policy direction that provision can be sought in a similar manner to meeting affordable housing needs. It should be provided as serviced land, in perpetuity. The concern was that otherwise there would be a reliance on 9(g), which was described as an unplanned approach unlikely to meet the needs of the community.

In terms of the specific reference in 9(c), it was suggested that it should be qualified by 'a need having been identified'.

d) Homes should be of a high quality and contribute to making great places

In addition to general comments in support of homes being of a high quality and contributing to making great places, it was suggested that there should be greater emphasis on:

- The importance of design.
- A green infrastructure first approach and providing access to outdoor space.
- Building at a sufficient density to sustain existing or future local facilities, services and amenities.

It was also suggested that there must be consideration of how surface water is managed at individual plot level, including local capture and reuse, to ensure water resilient places are delivered.

In terms of what makes for quality homes, comments included that:

- There needs to be a focus on a variety of house and tenancy types to meet the needs of all community groups and promote community cohesion.
- Homes must be low-carbon future-proofed and include low carbon heating and on-site generation. It was seen as essential that planning policy relating to homes supports the changes taking place within the low-carbon heating sector.
- There should be full fibre in all new build properties in Scotland. This consideration should be added to 9(d).
- Some of the six qualities of place are more difficult than others to apply to the dispersed single unit housing developments that are prevalent in some rural areas. A proportionate approach will be needed.

There was a concern that 9(d) lacks any meaningful detail which could be used to assess whether proposed housing is adaptable to changing and diverse needs and lifestyles. It was suggested that terms such as 'high quality' and 'great places' can be interpreted differently, and that this could lead to conflict and delays. It was suggested that NPF4 would benefit from design guidance that reinforces the commitment to delivering high quality homes set out in Housing to 2040, including by identifying how the planning framework will support these efforts.

However, there was also a view that being adaptable to changing and diverse needs and lifestyles is most likely a function of a home's construction and internal layout and, as such, is outwith the remit of planning and is more appropriate to Building Standards. It was also suggested that, in any case, the matters covered at 9(d) are contained in Policy 6 (Design, quality and place) and do not need to be repeated at Policy 9.

e) Statement of community benefit

General comments included that, while the requirement for a Statement of community benefit may be a positive step, more information and detail is required. Issues about which further clarity was sought included:

- What is meant by 'improving the residential amenity of the surrounding area'? How are 'local' housing requirements to be defined?
- What weight can be given to the Statement and how far the planning authority can go in challenging its contents?
- Whether there is to be any input, consideration or approval from the actual community?

In terms of the approach and Statement, it was suggested that provision should be made for local communities to be involved in the development and assessment of such statements. Other comments included that:

- An explanation of how a proposed development meets local housing requirements, including affordable homes, will be useful. This early engagement would assist the strategic housing authority to identify new developments in the pipeline in relation to affordable housing policies and identify developments which may need to be earmarked for grant funding.
- There is potential for this to be mixed up with existing requirements for community benefits linked to public sector procurement. Consideration should be given to a different name for the Statement, such as 'Meeting housing and community needs'.
- The Statement should draw on links to the 20-minute neighbourhood concept and how proposals benefit, supplement or provide facilities to promote this concept.
- Producing a Statement should be a responsibility for all new development, rather than being limited to housing.

In relation to the 50 homes threshold, there was a question as to whether it is too high, and it was reported that smaller developments can still have a significant impact on a small settlement or a particularly sensitive location. There was support for flexibility around the threshold of 50 homes in rural areas. An alternative perspective, however, was that the opportunity for local authorities to extend this requirement to smaller proposals in rural areas risks allowing for an overly onerous approach to be adopted by some.

Clarity was also sought in relation to what would be expected to be covered under the Statement. Further comments or suggestions included that:

- Developers should be asked to identify how they are contributing to community wealth building objectives. The concept should be expanded to address and consider the full 'local socio-economic impact' of the development, and specifically how the development will contribute to the compact local living agenda, for example by providing sources of long-term employment, connectivity and access to services and nature.
- It should address both positive and negative environmental changes that will impact on the local community.

Others raised some fundamental concerns about 9(e), including that community benefit is not a planning consideration and will not be picked up in the process of allocating sites, or reflected in the site allocation in the LDP or through other LDP policies when considering any planning application. Given this situation, it was suggested that it should only be required for allocated sites if the proposal is not in accordance with the detail of the LDP.

A number of practical issues and challenges were also raised, including how an application would be assessed against a Statement of community benefit, and when an application could be refused on the basis of the Statement of community benefit? Other notes of caution included that:

- The Statement could be given more weight than other policies by some decision makers.
- Assessment of the Statement would also be an additional resource ask of local authorities, who already face extra demands and dwindling resources.
- Identified community benefits may not always be related to the development directly, and development management may not have the tools and policies available to secure developer-promised community benefits.
- Whether major housing developments can be deemed to be improving surrounding residential amenity is a matter of perspective; it would be likely to be strongly contested by neighbouring residents despite any proposed improvements.

It was also noted that there may not be any need for the enhancement of local infrastructure, facilities or services arising from a proposed development and while this policy implies that it is 'a given' that must be addressed.

f) Homes that improve affordability and choice

General comments included that some of the language could be clearer, for example around what is meant by 'choice'. There was a concern that the current wording is not strong enough to ensure that market-led developments will meet the aspirations of Housing to 2040 to improve choice and affordability for all. An associated point was that simply supporting developments which contribute to this goal will not give local authorities enough leverage to ensure that the type of housing delivered is diverse and meets peoples' needs.

It was suggested that in the interests of certainty and clarity for developers and communities, the LDP should form the basis for taking an equalities-led approach, and that the approach in the LDP should be informed by the Evidence Report and LHS. An associated suggestion was that when these other documents are updated, they should be given consideration in the assessment of proposals for new homes, as further material considerations.

Also in relation to identifying needs, it was suggested that it will be important to be clear about whether needs are to be based on the local authority evidence of the housing mix required, or on developers' understanding of 'the market'. It was suggested that these can often be very different, but also that the current assessment methods for determining need are inadequate.

There were also comments about the list of households that may have a specific housing need, including that the list is not required if it is non-exhaustive as it could be read as setting out the only options available.

It was suggested that including all the groups listed within the Place and Wellbeing Outcomes would provide the level of inclusion needed for NPF4 to achieve the outcome set by the Planning (Scotland) Act 2019 on reducing inequalities. Specific suggestions for groups to be added to the list included:

- Those who are homeless or at risk of homelessness.

- People living in overcrowded accommodation.
- Victims of domestic abuse.

It was also suggested, however, that it will be the Strategic Housing Investment Plan that sets the groups for which provision will be made.

The housing needs of older and disabled people

(Please note that this issue is discussed further at Question 56 (Annex A – NPF4 Outcomes statement).

It was noted that The Town and Country Planning (Scotland) Act 1997 (as amended) places an obligation on Scottish Ministers to include a statement in the NPF about how they consider that development will meet the housing needs of older people and disabled people. The Act also places a duty on Ministers to report to Parliament every two years on how the planning system is operating to meet the housing needs of older and disabled people. It also contains a requirement for LDPs to address the housing needs of the population of the area and the availability of land for housing, including for older people and disabled people.

A number of respondents considered that there is insufficient content within the draft NPF to meet the requirements outlined above. It was suggested that Policy 9 should clearly set out needs in terms of housing, both in terms of quality and quantity, along with how these needs should be met at a local level. It was also suggested that:

- NPF4 should be clear about the need for a sound evidence base to inform the housing numbers and site allocation set out in LDPs.
- Detailed research and analysis should be undertaken to demonstrate what needs exist, and how planning authorities might address them.

With specific reference to housing for older people, issues that respondents wanted to see addressed included:

- Improving ease of access to services, either by locating such services close to residential areas with a high population of older people, or by ensuring frequent, safe and accessible transport links between residential and service areas.
- Ensuring there is sufficient adaptable housing for single people and older households to meet needs arising from disability, a long-term health condition or increased frailty. In particular, addressing the requirements of older people for adaptable housing in rural areas and in new housing developments was highlighted.

With regard to wheelchair accessible housing, it was suggested that the Public Sector Equality Duty should be referred to, along with the Fairer Scotland Duty. Further comments included that:

- It would have been helpful if the Scottish Government confirmed that research would be undertaken on setting percentage requirements for wheelchair homes.

- The Scottish Government should require all local authorities to ensure that a minimum of 10% of new-build homes across all tenure types are built to a wheelchair-accessible standard. This should be monitored and reviewed throughout NPF4, planning policy or through changes to Building Standards.
- Local authorities should meet their duty to publish their EQIAs alongside their LHS and Strategic Housing Investment Plan. Evaluation could then be carried out on the impact of projects on people with, or who share, protected characteristics.

A disparity in guidance where the LHS is required to state a cross-tenure target for delivery of wheelchair accessible housing, and the LDP is not, was also highlighted. It was also suggested that requirements around wheelchair accessible homes should be addressed through Building Standards rather than be considered 'a choice'.

Other comments also focused on disabled peoples' right to accessible housing. They included that NPF4 should be bolder in terms of highlighting housing-related human rights, and should:

- Require evidence reports and LHSs to use evidence and projections of demand for accessible homes from disabled people who wish to buy or rent privately, as well as those waiting for housing in the social rented sector.
- Encourage accessible housing solutions to come from the private sector. It was suggested that NPF4 should include methods of encouraging and requiring housing developers to build a proportion of affordable homes with space standards that would make them easily adaptable to wheelchair standards; this also means considering how to market and sell these houses effectively.
- Introduce requirements for checks to ensure that new build homes are accessible to disabled people. Remedial works should be required if they are not.

There was also a note of caution against over-reliance on housing waiting list data to evidence disabled peoples' housing needs. It was noted that accessibility is not simply about wheelchair accessibility or physical access and that autistic people and those with dementia, mental health problems or learning disabilities also experience access barriers.

Young people and children

It was suggested that NPF4 should also consider what high quality homes look like for young people. It was noted that there is no mention of child-friendly neighbourhoods, and it was suggested that reference needs to be made to child-friendly planning within Policy 9. Other comments included that:

- Involving children and young people in decision-making, and using the existing evidence we have around children's play and hanging out in urban environments, can substantially improve how we plan new housing so that it meets their needs.

- The relationship with Policy 7 (Local living), and 20-minute neighbourhoods specifically, should be considered. For young people the safety of the local area and access to the resources they need such as parks, transport and shops are key to their homes feeling appropriate and safe.

Community-led housing

A number of comments focused on community-led housing, and included that community-led housing development already takes account of locally specific market circumstances. It was also suggested that housing providers are not currently addressing the need for housing in smaller settlements and that plan-led approaches are failing to take account of housing demand within local contexts.

There was a call for NPF4 to support and promote the community-led approach, with policies that welcome and support community-led housing proposals and demonstrate commitment to enabling communities to deliver housing needs. Suggestions for how this could be achieved included that:

- Community-led housing policies should be developed and local needs housing sites should be allocated in LDPs.
- There should be a presumption in LDPs in favour of community-led housing in areas of pressure.
- LDPs should state how public development corporations and community development corporations will be supported to assemble land.

Other issues to be considered

Respondents also identified other issues that they wished to see considered in relation to improving affordability and choice. These included:

- Reducing the long-term operating costs and energy required to occupy any new homes built.
- Requirements for a minimum proportion of new homes to come with dedicated home office space.
- Means of controlling the number of second homes and properties that are not principal residencies.
- A clear policy position on the use of residential caravans as a form of permanent accommodation.

g) Gypsy/Traveller and Travelling Showpeople sites

There were relatively few comments about 9(g) other than a very substantive submission submitted by a number of individual respondents. Some of the issues they raised have already been covered under 9(c) above. Other points included that the specific inclusion of a policy commitment to provide for quality homes within the Gypsy/Travellers community is welcome but that:

- This requires some refinement and strengthening to reflect the societal and family needs of those being provided for, specifically children and young people. It also necessitates an onus being placed specifically on planning

authorities, by Scottish Government, to require the provision of accommodation, not simply to encourage its provision.

- It will be important that placemaking grounds are used to ensure that Gypsy/Traveller sites are integrated and provided for, both with regard to design but also infrastructure and access to services. This will ensure improved health and quality of life outcomes.

There was said to be an opportunity to consider placemaking as part of the preparation of design guides for communities and sites. There was a call for NPF4 to reflect these design guides, along with the references to the funding and delivery of Gypsy/Traveller provision set out in Housing to 2040. It was suggested that NPF4 should also provide an improved articulation and practical direction for planning authorities on the required quantum, type and nature of Gypsy/Traveller sites.

Comments made by other respondents included that:

- Clarity is required in relation to how need is to be determined, and what is meant by protected land or features.
- 9(g) refers to 'judgements' about Gypsy/Traveller and Travelling Showpeople sites; this feels jarring and should be replaced with 'assessments' or similar.

Other comments included that the assessment criteria set out are not expansive enough to assess the suitability and necessity of additional sites not already identified in the LDP. It was reported that Draft Gypsy/Traveller design guidance is being prepared and should be referenced, as should the 20-minute neighbourhood criteria listed in 9(i).

Finally, it was suggested that it is not clear why homes for Gypsy/Traveller and Travelling Showpeople should be permitted on sites not identified for that use, when other new homes are specifically not supported on land not identified for housing. An associated suggestion was that the policy should set a strong presumption towards allocated sites in the development plan and that only under very exceptionally circumstances should a non-allocated site be supported.

h) Affordable homes in areas where there is an identified requirement

Those who commented at 9(h) sometimes offered their broad support for the policy approach set out, although respondents were looking for clarity on some issues. These included what is meant by 'area' and whether it refers to the local authority area or to smaller housing market areas? There was also a query about whether the 'requirement' is expected to be derived from the HNDA, LHS or some other form of evidence?

Others raised concerns about 9(h), including that:

- There can be high expectations of what the private sector can deliver in respect to affordable housing, and this can result in unrealistic LDP policies which can have the effect of stifling all-tenure delivery.

- Contributions can be hard to deliver in the context of a 'brownfield first' strategy, given the likely high costs of such development.

It was also suggested that for some locations, mid-market rent, low-cost home ownership, community developed housing and in some cases self-provided housing may well be much better, more affordable and desirable options than the usual social rented housing approach.

At least 25%

Some gave their support for the contribution to the provision of affordable homes on a site being at least 25% of the total number of homes, including noting that it reflects the current affordable housing contribution requirements in their area, and that either higher or lower contributions may be appropriate if justified by evidence of need.

However, others did not welcome the approach set out and suggested that, with current SPP saying that the contribution should generally be no more than 25%, 9(h) represents a significant change in policy. Reasons given for disagreeing with the change included that the current 25% benchmark works in practice to some extent, and is now understood and mostly accepted by home builders and landowners.

The concern was that a policy context which encourages variation is likely to result in a highly differentiated mosaic of requirements, which will create uncertainty and confusion and could lead to a significant stifling of the delivery of private and affordable housing. It was suggested that this could also apply to the delivery of all-tenure housing projects and an evidence-based assessment of demand must be matched with funding commitments for sub-market priced housing. Other comments were that:

- Local authorities are likely to favour requiring a greater contribution over viability concerns.
- The current text could be interpreted to mean that affordable housing is required at a certain level even when there is no justification for it.

In terms of setting and setting out levels of contribution, it was suggested that there should be a consistent approach for either higher or lower contributions, both of which should be based on local evidence of need. It was also suggested that:

- It should be made clear that 9(h) should be the default only in the absence of existing, evidenced, up-to-date LDP policies on affordable housing.
- The appropriate place to set a higher threshold for contributions would be through the development plan, or alternatively the LHS, particularly where the LDP has been in place for some time. It was thought that this would ensure that the local authority's approach is clear, giving certainty to developers and communities and avoiding an ad hoc and inconsistent application of the requirements.

- A definition of the limits of locations and circumstances where a lower contribution may be appropriate is required, particularly in complex cross-boundary market areas and where joint HNDAs are required.

Other comments on levels of contribution included that:

- The current wording suggests that, at the point of the determination of a planning application, the 25% provision would need to be applied unless there was adopted LDP policy that permitted a lower provision. It was suggested that discretion to permit a lower provision in LDPs must equally be available to planning authorities in determining an individual application, even where there is no LDP policy in place to that effect.
- Affordable housing requirements should be set at a local level based on specific viability assessments. The reference to 25% should be omitted and replaced by a statement that market housing must include levels of affordable housing to be agreed at a local authority level.

Serviced land

There were also a small number of references to the role of serviced land. They included a view that serviced land as the contribution is not widely utilised at present. Other comments included that more detail is required, including that:

- It is important to reference that land can be transferred either at a value relating to its end use for affordable housing, or by agreement between the developer and the local authority or Registered Social Landlord, at a lower value. In any event it should be transferred at less than the value for mainstream housing for sale.
- The role that other contributions can make to the delivery of affordable housing, such as commuted payments, off site provision or provision of completed units on site, should also be referenced. It was suggested that serviced land may be appropriate in pressurised housing areas due to high land values, but that it is important for national policy and guidance to provide the necessary flexibility for the whole of Scotland.

A suggestion was that 9(h) could refer to developers being expected to make X% of the number of serviced plots available for affordable housing, but that if no funding is available to deliver the affordable housing on site, alternative solutions will be considered.

Exceptions for smaller scale developments

Comments relating to smaller scale development included that it is positive to see this suggestion regarding exceptions. It was suggested, however, that it will be important to be clear about how the unmet need will be adequately assessed. Suggestions included consultation with local elected members, community councils, local development groups and schools, rather than requiring communities to produce costly housing needs surveys.

i) Land not identified for housebuilding

Some respondents noted that they agreed with new homes on land not identified for housebuilding not being supported, but most of those commenting raised concerns about this policy. They included that some of the language used is ambiguous, and that it would be easier to read if it did not use double negatives.

Some respondents, including many 'Development, Property or Land Management Company or Representative Body' respondents were concerned that the 9(i) is far too limited and that there would effectively be no circumstance that would enable a 'normal' housing site to be given permission, unless all of the sites in the housing land pipeline were underway. Suggested changes included that:

- There must be a mechanism to permit housing on unallocated sites in the event that there are not enough deliverable short- and long-term sites to meet the Housing Land Requirement.
- In certain circumstances, sites not identified for home building in the LDP should be considered/supported, provided that they are consistent with the Site Assessment Methodology confirmed in the Evidence Report.

A very different perspective was that there are too many exceptions set out at 9(i), or that there should be none. The concern was that, including with the use of 'or' at the third bullet point, the policy suggests that proposals would not have to be consistent with the spatial strategy or other relevant policies. For example, there could be confusion as to whether residential developments which are in unsustainable locations, or do not meet requirements in terms of design or positive effects for biodiversity, could be supported. There were also concerns about the lack of reference to biodiversity and the nature crisis.

There were also a number of issues raised about how the policy would work in practice. These included a concern that, as currently drafted, 9(i) will prevent development of windfall sites in acceptable locations. There was a specific query as to whether the 9(i) would apply to brownfield windfall sites, and it was suggested that this would be overly restrictive.

A number of respondents commented specifically on the first exception relating to progress in the build-out of housing land pipeline sites exceeding delivery timelines. Points included that:

- Combined with the second exception (an agreed timescale for build-out), the first exception provides significant opportunity for the housing land supply to be disputed. Specifically, it was noted that there is no identified process for measuring whether or not progress in delivering the housing land pipeline is exceeding the delivery timelines, and 'overall progress' is also open to interpretation.
- It should be understood within the wider context of market forces which are elastic and as such, planning for housing in a period of high development activity may not lead to the sustainable outcomes that NPF4 generally seeks to achieve. NPF4 should be clear that the brownfield first approach should

take precedence. Any additional release should be plan-led and linked to a mid-term Plan review. It should be evidenced by updated household projections or other information, rather than granting planning permission in potentially less sustainable locations in a period of high building activity.

A different perspective was that there should be a presumption in favour of sustainable, non-allocated sites being introduced if the accumulating delivery either exceeds or falls short of the housing delivery pipeline by 20% or more for two consecutive years. It was accepted that buffer percentages, and the period of over or under-delivery, should be subject to detailed consideration, but there was a call for clear and objective criteria to be identified.

There were also differences of opinion on the third exception, that a proposal should be consistent with the spatial strategy and other relevant policies. One perspective was that the focus on the plan-led system, and the emphasis on relevant policies, should be retained. There was also a call for a specific reference to green belts. Others were concerned, however, that the third exception could result in continued patterns of growth across rural areas, including pressured areas, without consideration for sustainability, good placemaking, or 20-minute neighbourhoods.

On the fourth and fifth exceptions, comments included that 'small sites' and 'residential areas' should be clearly defined and that:

- Existing small groups of housing may not be best located for increased density or expansion to be appropriate. It was also noted that while appropriate windfall development within urban areas does tend to be smaller in scale and be within established residential areas, this is not always the case. It was suggested that in limited circumstances larger housing sites, or those in areas not deemed to be predominantly residential in nature, can be acceptable where these will not result in any negative impacts upon the character of the area or surrounding land uses.
- Sites should be allocated with consideration of a wide range of other policy matters such as the spatial strategy. There was an associated concern that the fifth exception could open the doors to the increased provision of affordable housing on unplanned sites and could undermine the plan-led system. There were calls for the fifth exception to be removed.

j) Householder development

Those who commented sometimes welcomed the content on householder development, although there was also a suggestion that householder applications should be dealt with through LDP design policies and should not be covered in a national planning document.

In terms of the draft NPF as set out, a number of issues were raised, or points of clarification sought. The most frequently-raised query was whether all four of the criteria need to be met. There was also a request for guidance on how the criteria are to be interpreted and prioritised in the decision-making process.

There were some concerns about the criteria relating to providing adaptations relating to people with health conditions and in response to risks from a changing climate. It was assumed that the intention is not that householder development would need to be providing adaptations for health conditions and changing climate. It was suggested that if the intention is to give greater support than otherwise to proposals for health- and climate-related adaptations, then this should be made clear. However, there was also a view that the adaptations criteria should not override those about neighbourhood amenity and should perhaps be removed.

If not removed, there was a call for clarification around:

- What would be accepted as being an adaptation in response to risks from a changing climate?
- The definition of 'environmental quality of the house' and 'physical impact'.

Suggested additions included that the detrimental impact criterion should also refer to siting as a key consideration. Other comments or suggestions included that:

- There should be a link back to Policy 6 (Design, quality and place).
- A criterion on providing the necessary infrastructure and mitigations to make a development acceptable, for example bin stores, privacy screens and parking (where appropriate), should be added.
- Consideration should be given to what evidence is likely to be required in relation to adaptations which require planning permission. It should be clear if adaptations include extensions.
- There should be greater ambition, including around requiring proposals which seek to extend and/or alter the existing built stock to adopt a 'fabric first approach' to improving the energy performance of the existing building.

Policy 10: Sustainable transport

We want to reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices.

Question 32 – Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

Around 325 respondents made a comment at Question 32.

Most of those commenting supported the principle and overall direction set out by Policy 10, although most also expressed some reservations and/or suggested amendments or additions.

Some respondents saw the policy as too ambiguous and permissive, expressing concern that it may not be effective in preventing unsustainable development. Other concerns related to delivery of the policy, reflecting a view that its application through development management will be vital to its success. Respondents also questioned the extent to which Policy 10 takes account of the diversity of Scotland's

places, with particular concerns regarding the relevance of some parts of the policy for rural and island communities. There were also calls for clearer financial commitments to provide the investment required to support the policy, especially around active travel and public transport infrastructure, and achieving a modal shift from private car use.

Other issues raised included that the policy should:

- More explicitly highlight the importance of sustainable travel for carbon reduction and the delivery of net zero targets.
- Be re-ordered, for example reflecting a view that parts relating to active travel and emissions reduction are more important and should be presented earlier in the policy.
- Make clearer links with other relevant policy and strategy such as the National Transport Strategy, RTSs, Active Travel Strategies, Regional Spatial Strategies, Local Transport Strategies and Active Travel Plans.

It was also suggested that clarity is required regarding how sustainable transport infrastructure is to be assessed as deliverable.

a) LDPs should aim to reduce the need to travel unsustainably by prioritising locations for future development

Some of those commenting simply expressed their support for the role of LDPs in reducing unsustainable travel, with some indicating that this was a key element in their overall support for the policy. Those expressing support also highlighted the potential role in reducing carbon emissions and suggested that reducing unsustainable travel should also be reflected elsewhere in NPF4, such as at Policy 7 (Local living), Policy 8 (Infrastructure first) and Policy 9 (Quality homes).

However, some respondents highlighted concerns or suggested amendments. This was most commonly related to a perception of urban bias across Policy 10 as a whole, and a view that rural areas would face significant challenges in implementing some of its elements.

It was suggested that for many rural and island areas with more limited sustainable transport infrastructure, development proposals are likely to require greater reliance on private car travel than is the case in urban areas. Some wished to see this acknowledged more clearly, for example by providing a wider definition of 'sustainable travel' to allow for differences between urban and rural areas. Suggested amendments included:

- Referencing more sustainable car travel, such as electric and zero carbon fuel cars or car sharing.
- Including definitions for 'sufficient infrastructure capacity', 'minimum quality and safety of travel' and explaining what is being referred to in relation to opportunities to incorporate renewable energy generation as part of development.

Respondents also raised concerns that 10(a) could obstruct or prevent NPF4's aim to increase the population of rural and island areas, including by limiting rural development and the strengthening of infrastructure in areas which currently lack sufficient sustainable transport options. It was also suggested that 10(a) would rule out the potential to use rural development to contribute towards the development of more sustainable transport infrastructure in rural areas.

Some respondents also questioned how effective 10(a) was likely to be in reducing unsustainable travel. There was a view that LDPs will not be effective in reducing unsustainable travel until better sustainable travel options are available, particularly in rural areas. It was also suggested that 10(a), and Policy 10 as a whole, do not acknowledge established patterns of development, population movement and service delivery across Scotland, and that planning policy will have limited impact on unsustainable travel without wider work to change these patterns.

Suggested changes to 10(a) included that:

- LDPs should be required to identify potential for retrofitting sustainable transport infrastructure.
- Consideration should be given to the requirements set out in LDP regulations and guidance.
- 10(a) and (b) could be merged.

It was also suggested that 10(a) reflects a requirement placed on LDPs which is considered in more detail by LDP regulation and guidance, and as such may not be an appropriate NPF policy.

b) LDPs should be informed by an appropriate and effective transport appraisal

Comments in support of 10(b) included particular reference to the requirement for LDPs to be supported by a transport appraisal, the application of sustainable travel and investment hierarchies, and the promotion of 20-minute neighbourhoods. However, most of those commenting highlighted issues or suggested changes.

Some wished to see 10(b) strengthened, with specific suggestions included making clear that developments which do not support the sustainable travel hierarchy will not be approved, and requiring that developments in less suitable locations are leveraged to improve active travel and public transport infrastructure.

Some questioned whether the Development Planning and Management Transport Appraisal Guidance (DPMTAG) should continue to be the benchmark for transport appraisals. These respondents noted that this guidance is now more than 10-years old and highlighted the extent to which the policy context has changed over this period, including through the refocusing of transport priorities under National Transport Strategy 2 (NTS2). This view was reflected in calls for DPMTAG to be reviewed and updated as a matter of urgency. The DPMTAG process was also described as resource intensive for smaller planning authorities, and it was suggested that greater flexibility in the transport appraisal approach may be appropriate. There was also concern that shared transport is not referenced by

transport appraisal guidance, with suggestions that this should be included as one of the alternative transport modes to support the decarbonisation of travel.

Other suggested amendments included the need to:

- Set out the sustainable travel and investment hierarchies in NPF4.
- Make clear the links to Policy 7 (Local living) and other sections of NPF4 that cover 20-minute neighbourhoods.
- Include clearer cross-referencing to LDP regulations and guidance.
- Reference cross-boundary movement and partnership working through Regional Spatial Strategies.
- Reference the link to supporting rural repopulation and the delivery of Policy 31 (Rural places).

c) A transport assessment is required where a development or change is likely to generate a significant increase in the number of person trips

The meaning of ‘significant’ in relation to person trips was the main focus for most of those commenting, with calls for NPF4 to set out a clear definition. It was recognised that the threshold may vary for different proposals, but some felt that a clear measure could be provided to ensure clarity and consistency of approach. There were suggestions that the definition should favour sustainability, for example referencing the NTS2 target to reduce car kilometres by 20% by 2030, and/or expecting a majority of these trips to be made by sustainable means.

Some also wished to see greater clarity on the recommended approach to the transport assessment, including who will be responsible for undertaking the assessment and delivering any measures required to address the identified transport impact. Strengthening 10(c) to state that developments which are likely to generate a significant increase in person trips will not be supported if the transport assessment indicates that these will be predominantly by private car was also proposed.

It was also suggested that 10(c) does not recognise the complexity of response required to a development which generates a significant increase in the number of person trips. There were calls for encouraging the reimagining of town centres to create sustainable places that put people first, removing the focus on cars.

d) Significant travel generating uses and other relevant developments must be accompanied by a Travel Plan

Most of those commenting focused on the meaning of ‘significant travel generating uses’. Respondents wished to see NPF4 set out a clear definition of ‘significant’ to ensure clarity for developers and communities and a consistent approach across Scotland. As was noted in relation to 10(c), some wished to see the definition include reference to sustainability of travel, including specific reference to ensuring consistency with current SPP. It was also suggested that a clear definition of ‘smaller scale development’ is required to ensure clarity for developers and communities.

Reference was also made to monitoring of Travel Plans, including suggestions that this should be linked to targets set by LDPs and Local Transport Strategies. Some also wished to see updated guidance to inform the approach to Travel Plans, and it was suggested that funding will be needed to deliver improvements and mitigation measures identified by such plans.

e) Proposals with the potential to affect the operation and safety of the strategic transport network require a full impact assessment

Some objected to developers being required to meet the costs of mitigation measures to ensure the continued safe and effective operation of the strategic transport network. These respondents noted that strategic transport interventions often have a spatially wide-ranging impact, and suggested that the costs of mitigation should not be met by a single developer when there is a wider benefit. It was also suggested that mitigation costs should not be met by one developer where this would make the development unviable. There was also concern that 10(e) could result in developers being held responsible for the cost of rectifying existing deficiencies in transport infrastructure. There was a call for guidance for local authorities on what is to be considered a reasonable cost to be met by developers.

Other suggested changes included:

- Providing clarification around whether the capacity of existing infrastructure and mitigation measures required are expected to be identified through a transport assessment, and whether assessment of development impacts refers only to the interest of Transport Scotland.
- Adding a requirement that mitigation measures are sustainable.
- Expanding 10(e) to consider proposals that may affect any part of the transport network, rather than being limited to the strategic transport network only.

f) New junctions on trunk roads will only be considered where significant benefits can be demonstrated

Many of those commenting noted that the provision of new junctions on trunk roads is a function of Transport Scotland, including some who felt that this issue should not be covered in NPF. Others suggested an amendment to allow consideration of developments supported by specific LDP proposals, which would have been agreed in principle with Transport Scotland.

Others suggested that permitting expansion of road capacity is not consistent with the spirit of NPF4 and the NTS2 hierarchy, along with the commitment to reduce car kilometres by 20%. Concerns were raised that 10(f) could lead to the justification of unsustainable development.

To ensure a consistent approach, some saw a need for a clear definition of 'significant prosperity or regeneration benefits'. Other suggested changes included:

- Referencing the application of ‘Designing Streets’ policy and guidance where trunk roads are within urban boundaries.
- Adding a requirement for any new junctions to support sustainable travel, including public transport and active travel.
- The inclusion of carbon emissions associated with the construction and future use of trunk road junctions as considerations for refusing development proposals.

g) Development proposals should put people and place before unsustainable travel

Many of those commenting expressed support for 10(g), including the particular reference to the opportunity to incorporate blue and green infrastructure and nature rich habitats as part of new transport infrastructure.

However, some felt that 10(g) needs to be strengthened if it is to be effective, for example by requiring that all new transport infrastructure incorporates blue and green infrastructure, that all development proposals put people and place before unsustainable travel, and that all development reduces the number and speed of vehicles and provides safe crossings. It was suggested that these changes are required to ensure consistency with Scottish Government climate change targets. It was also suggested that there should be an emphasis on the importance of sustainable transport and investment hierarchies when considering proposals.

Other suggested changes included:

- Adding a clear definition of ‘unsustainable travel’ for Policy 10 as a whole, 10(g) specifically.
- Proving clarity on 10(g)’s application in rural areas with poor existing transport infrastructure
- Referencing the reallocation of road space to prioritise non-motorised users, as part of designing places which put people first.
- Ensuring placement of new transport infrastructure avoids negative impacts on existing habitats and biodiversity, and incorporates wildlife mitigation measures.
- Encouraging a more joined-up approach between planning and roads departments to ensure effective implementation.
- Making clearer links with Policy 6 (Design, quality and place) and the ‘Designing Streets’ guidance. This included calls for existing ‘Designing Streets’ guidance to be refreshed.

h) Significant travel generating uses should not be supported where these would increase reliance on the private car

Some respondents wished to see 10(h) strengthened to make clear that any developments that increase private car reliance should not be supported, irrespective of associated sustainable transport infrastructure. These respondents suggested that this stronger formulation is required to meet Scottish Government

climate change targets, including the commitment to a 20% reduction in car kilometres by 2030. It was also suggested that NPF4 should make clear that developments should meet all three criteria set out under 10(h) if they are to be considered.

Others felt that 10(h) should be more realistic in its aim to reduce car use, and there was a view that the private car will remain a key mode of transport for many people in the short to medium term. There was some scepticism around how effective NPF4 can be in reducing reliance on the private car, for example without significant changes in public attitudes towards other travel modes. This included references to a need for significant behavioural change, and substantial investment in public transport and other sustainable transport infrastructure.

There were also concerns about how 10(h) would affect rural and island areas, particularly in the context of support for rural repopulation and supporting the rural economy. Some wished to see an exception for rural development, which they expected to support repopulation and/or bring prosperity benefits. Respondents also suggested that allowances for more sustainable means of private car travel, such as electric vehicles and different vehicle ownership models, should be included.

Respondents also raised issues about the implementation of this part of policy. This included calls for a definition of 'significant transport generating uses', especially in the context of rural and island areas, and clarification on how the 400m threshold for walking or wheeling compares to the spatial definition of 20-minute neighbourhoods. In relation to transport assessments, there were calls for DPMTAG to be updated to ensure all modes of sustainable transport are considered.

i) Development proposals and sustainable transport

Some of those commenting saw a need for further clarity to support interpretation and implementation of 10(i). This included calls for policy guidance to support planning authorities in its application in the development management process. Clarity was also sought on whether all development proposals are expected to meet the criteria set out under 10(i), with some suggesting that it should be made clear that it only applies to developments 'where appropriate'.

Others wished to see a stronger requirement on developments that they 'must', rather than 'should', meet the criteria set out in NPF4. It was also suggested that 10(i) should be reflected at Policy 6 (Design, quality and place) in relation to design, and at Policy 23 (Digital infrastructure).

In terms of particular aspects of 10(i), most of those commenting referred specifically to public transport and the provision of low or zero emission vehicle and cycle charging points.

In relation to developments being accessible by public transport, it was noted that all current registered bus services in Scotland receive on-going public sector funding, and some suggested that very few parts of the public transport network in

rural areas are commercially viable. There were calls for the policy to acknowledge the challenges facing public transport in rural and island areas in particular. This included reference to the potential role of community transport schemes. It was also suggested that reference to access by public transport should be expanded to include all sustainable transport, including access by active travel modes. A definition of 'reliable public transport' was also requested.

The focus on provision of low or zero emission vehicle and cycle charging points was specifically welcomed by some. This included support for provision in rural areas and included calls for a requirement that all rural housing development includes provision of vehicle charging points. There was also support for the provision of electric vehicle and cycle infrastructure in economically disadvantaged areas, reflecting a concern that market forces alone may not deliver the required infrastructure in these areas. A requirement for electric vehicle charging points for all domestic and commercial development was seen as one way of ensuring that disadvantaged areas benefit.

Comment on the provision of low or zero emission vehicle and cycle charging included calls for greater clarity on what developments are expected to provide in terms of vehicle and cycle charging points, for example with some noting that it is unclear whether hydrogen networks will be developed within the life of NPF4. There was said to a need for national requirements and standards. Some wished to see reference to charging points for personal mobility scooters and e-scooters. It was also suggested that the policy should make clear whether charging points must be provided within the boundary of the development, or whether provision of charging points and/or network development elsewhere is acceptable. Some also wished to see a requirement for a clear justification of why charging points cannot be provided within a development.

Reference was also made to the impact of vehicle charging infrastructure on the electricity grid. This included calls for 10(i) to include explicit consideration of this impact and a perceived role for on-site energy generation to help mitigate impacts on the electricity grid.

j) Proposals to improve active travel infrastructure or public/multimodal transport hubs should be supported where deliverable

There was support for the focus on the potential role of easily accessible active travel infrastructure in encouraging a modal shift away from cars. Some thought that this aspect should be given greater priority in Policy 10 and include links to relevant national policy targets. It was also suggested that making the provision or funding of sustainable travel infrastructure mandatory, or requiring all new or widened roads to incorporate traffic-separated active travel, would strengthen the approach.

Concerns were raised around the scale of change required to achieve a significant shift towards active travel and public transport use, including the need for additional investment in both active travel infrastructure and public transport. Some wished to see NPF4 set out further detail on the scale of investment required. This included calls for public funds to be dedicated to upgrading active travel infrastructure and

public transport links across Scotland, reflecting a view that the scale of investment required cannot be met by developers alone.

It was also suggested that 10(j) should be extended to protect existing active travel routes from other development, noting that active travel infrastructure such as the National Cycle Route are not protected in the same way as road and rail routes. Some also wished to see support for other sustainable transport options such as community transport schemes.

There were some concerns regarding how 'deliverable' is to be defined in relation to transport hubs, and the potential for this lack of clarity to lead to developers seeking to disprove the viability of sustainable infrastructure. This was seen as a particular issue given that many sustainable transport developments may only be viable with some form of subsidy.

Other issues and suggested amendments included:

- A definition and further guidance are required in relation to 'mode share targets'.
- Reference should be made to the role of street design in supporting active travel modes over vehicular traffic, including reference to 'Cycling by Design'. There was also support for the identification of active travel links and public transport links from the outset of development design. Respondents wished to see NPF4 encourage early engagement with public transport planners and operators for all large-scale development.
- Making clear that proposals to improve active travel infrastructure or public/multimodal transport hubs must also be assessed against other national and local policies.
- Clarifying whether demonstrating that the proposed development can be delivered is a material planning consideration?

Reference was also made to specific infrastructure and amenities which respondents wished to see supported, including:

- Cycle-related amenities and infrastructure including dedicated cycle lanes, charging stations, repair facilities and parking and storage.
- Ensuring people feel safe using active travel infrastructure, such as through the use of passive surveillance.
- Incorporating electric vehicle charging, clean fuel and last mile logistics as part of multimodal hubs and other transport infrastructure.
- Provision of greened active travel infrastructure.

k) Transport infrastructure proposals must consider the needs of users of all ages and abilities

Respondents sought further detail on several aspects to ensure effective and consistent implementation of 10(k). This included calls for clarity around the types of transport infrastructure to which it will apply, which equalities legislation is to be

considered and how the needs of users are to be assessed and prioritised. 'Cycling by Design' was seen providing a potential definition of user groups and abilities.

Clarity was also sought on how 10(k) links to other legislation and policy. Respondents questioned whether the policy would require planning authorities to assess all planning applications against equalities legislation, with some questioning whether this should be included in planning policy if it is a requirement of equalities legislation. Respondents also referred to the Public Sector Equalities Duty to involve people with protected characteristics in EQIAs and other assessments, and to links with Policy 4 (Human rights and equality).

Specific groups which respondents wished to see reflected included:

- Women, including their specific experience using public transport.
- Those with mobility needs. This included reference to the concerns of disabled people that the poor design of some active travel schemes limits their ability to use sustainable travel modes. It was also suggested that the private car remains a vital mobility aid for many. There were calls for reference to the provision of disabled parking.
- Children and young people, especially the potential for safety and cost concerns to limit their participation in active travel.

I) Proposals should consider the need for cycle parking

Some respondents specifically welcomed the support for cycle storage and parking, including reference to the potential for an increased need for cycle storage if other parts of Policy 10 are successful in encouraging a shift to active travel options.

However, it was suggested that 10(l) should be strengthened by setting out the level and type of cycle parking that development proposals are expected to include, rather than asking developers to 'consider' the provision of cycle parking. There was a particular concern that the policy should ensure provision of sufficient volume and size of cycle parking for the anticipated number and profile of households, recognising that some households will have multiple cycles. Some also wished to see a requirement that all cycle parking is sheltered and accessible.

Reference was made to 'Cycling by Design' as setting out relevant standards for cycle parking, and to the role of Policy 6 (Design, quality and space) in relation to the design of cycle parking. However, some questioned whether 10(l) adds to the design considerations already set out at Policy 6.

Some respondents also wanted to see 10(l) extended to include secure parking provision for powered mobility devices, and charging facilities for electric bikes and powered mobility scooters. These respondents also wished to see a greater emphasis on the security of cycle parking, for example to ensure those with high value electric bikes feel comfortable using cycle storage.

A small number of respondents also queried the reference to 'existing nearby provision' of cycle parking. This included requests for further clarity on how 'nearby' is to be defined and assessed.

m) Development proposals with low or no car parking provision

There were calls for these types of development to be given greater prominence under Policy 10, and for greater emphasis across NPF4 on the role of planning policy in limiting car parking provision. Some respondents also suggested a stronger approach for 10(m), for example that only developments meeting specific criteria will be supported, or a requirement that all developments in urban areas propose low/no car parking provision.

To ensure a consistent approach across planning authorities, and to resolve any disagreement with developers at the development management stage, some saw a need for clarity regarding how 'very accessible' is to be defined. It was also suggested that the relationship with 20-minute neighbourhoods should be considered, and that 10(m) should be expanded to include 'accessible', in addition to 'very accessible', urban places.

Other issues and suggested amendments included:

- Encouragement of developments with low or no car parking should not be at the expense of those who are not able to use active travel or other sustainable transport modes.
- Consideration should be given to ensuring compatibility with National Roads Development Guidance.
- The maximum parking standards set out at Annex B should be referenced in the main body of NPF4.

However, it was also suggested that 10(m) is not enforceable as currently written and should be removed.

Suggested additions

Respondents wished to see several policy areas and objectives given greater prominence in Policy 10. These included:

- Calls for a separate part of the policy specifically focused on rural development in the context of supporting rural repopulation. This included suggestions to include specific allowances and exceptions for rural development.
- Greater emphasis on climate change targets and the decarbonisation of travel, including support for electric and zero carbon fuel vehicles, a reduction in associated energy demand, and improving the climate resilience of transport infrastructure.
- The need for a specific reference to core path networks.
- The policy should support integration of renewable energy generation as part of transport infrastructure development.
- There should be greater consideration of the need for planning authorities to work together to deliver NPF4 policies given the cross-boundary nature of travel and freight.

Comments on Policy 10 also included reference to several transport modes and sectors which respondents wished to see better represented. These included:

- The sustainable transport of goods and materials, with reference to freight hubs, supporting a shift in freight from road to rail, last mile deliveries and cycle logistics.
- The role of aviation and airports for Scotland's international and UK connectivity and exports, and for island communities. This included reference to airport decarbonisation and reflected concerns that the policy, as currently written, could make it more difficult to deliver airport development.
- Sustainable transport links and other development considerations around High Speed Rail (ND13).
- Hybrid ferries.

Policy 11: Heating and cooling

We want our places to help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures.

Question 33 – Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

Around 240 respondents made a comment at Question 33.

Some of these respondents expressed their support for the overall approach set out by Policy 11. This included particular reference to the contribution that this policy can make to the decarbonisation of heat. Some requested clearer links between the policy and other aspects of NPF4 relating to heat decarbonisation, and also to other relevant standards such as the Passivhaus standard. There was also support for the joined-up approach proposed, for example with reference to LHEES, and the Heat Networks (Scotland) Act 2001.

However, some noted that heating is already controlled by Building Standards and sought greater clarity on the anticipated role of the policy in relation to these. This included suggestions that Building Standards may be a better means of achieving Policy 11's objectives. It was also suggested that aspects overlap with LDP Regulations and Guidance. These points sometimes reflected a wider view that NPF4 should be clear about how its policy relates to other legislation and regulation. Reference was made here to the Climate Change (Scotland) Act 2009 and the Heat in Buildings Strategy, and there were specific calls for greater consideration of the affordability of zero emission heating and cooling, for example through links to the Fuel Poverty Strategy.

Others suggested that the draft NPF is unrealistic regarding the achievability of aspects of Policy 11. Concerns were raised regarding the potential scale of resources required, for example in the assessment of technical proposals. More specific concerns were raised around the role of heat networks, with some of the view that the policy is too narrowly focused on technology. For example, it was

suggested that, while heat networks can deliver benefits for some development, NPF4 should better recognise what were seen as commercial, practical and viability constraints on the integration of heat networks with new residential developments. Particular concerns were raised regarding constraints on heat networks in areas of lower density heat demand. Respondents wished to see greater flexibility in the promotion of heat networks alongside alternative approaches.

Some respondents also referred to the role of other heating and cooling technologies. For example, it was suggested that evidence is limited on the potential for incinerators to generate heat from waste in Scotland, and does not justify a prominent role for this technology. In contrast, there were calls for greater prominence and further detail on the role of low carbon heat pumps, particularly in replacing fossil fuel and wood-fire domestic heating. This included reference to research identifying the potential for heat pumps to contribute to heat decarbonisation. Others wished to see greater emphasis on the retrofitting of existing buildings and heat networks, reflecting a view that retrofitting will have a significant role to play in delivering decarbonisation targets.

Finally, some respondents suggested specific changes to the draft NPF to remove what was seen as overly ambiguous references and to strengthen the policy. For example, requiring developers to 'be consistent with' or 'align with', rather than 'take account of' specific policies.

a) LDP land allocation should take account of LHEES and heat network potential

Most of those commenting expressed support for the link between NPF4 and LHEES, including heat network zoning and support for heat networks. However, there were also calls for further guidance on how the spatial implications of LDPs are expected to align with LHEES and heat network zoning.

Respondents also suggested amendments to strengthen the policy, including through further consideration of how it can contribute to the decarbonisation of heat. For example, some wished to see 11(a) ensure that the full range of low and zero carbon heating options are considered as part of the LHEES and heat network zoning process, and there were calls for clarity regarding whether NPF4 aims to actively encourage identification of new development that can support heat network zones. It was also suggested that 11(a) could go further by requiring LDPs to link to Energy Plans and consider whole energy system opportunities.

Other suggested additions included:

- Given the significant emphasis on heat network zones at 11(a) and across Policy 11 as a whole, providing further guidance to ensure that heat network zoning is underpinned by a robust evidence base. It was suggested that this should include specifics for a coordinated approach to heat mapping, with reference to the Scotland Heat Map.
- Adding a reference to energy efficiency and reducing energy demand as part of the energy hierarchy.

- Highlighting that consideration of existing and planned heat networks should not limit allocation of land.

It was also suggested that 11(a) should recognise potential challenges in convincing developers to connect to local heat networks even where these are already in place, and consider potential need for further legislation and/or financial incentives.

However, there was also a view that 11(a) is a statement of LDP requirements, and as such should not be included in development plan policy.

b) Development proposals should be supported where they connect to existing heat networks, especially within heat network zones

Many of those commenting expressed their general support for 11(b). There was particular support for the role of 11(b) and (c) in terms of future-proofing development to enable connection to future heat networks. However, it was also suggested that the relatively small number of existing and planned heat networks may limit their scope.

Some wished to see strengthening or clarification of what is envisaged. For example, there were calls for more clarity around how planning authorities should deal with cases where the design of a heat network zone means that development proposals cannot connect to the network. It was also noted that 11(b) does not ensure subsequent connection to a heat network, and there was a concern that this could lead to the redundancy of infrastructure. In this context, it was suggested that 11(b) should require that any development in a heat network area facilitates further expansion of the heat network. It was also suggested that NPF4 should reference the role of energy statements in the assessment of development proposals against 11(b).

Respondents cited a range of other considerations that may impact on the assessment of development proposals against 11(b), and potentially conflict with its aims. These included reference to cost effectiveness, technical feasibility including heat network capacity, proximity distance buffers, and other planning legislation such as listed building status. There were also calls for clarity regarding interpretation of 'including retrofit where appropriate', and a perceived need for further guidance on retrofit proposals, including any development types that will be exempt.

Respondents noted that significant technical expertise may be required to assess development proposals and potential for retrofit against 11(b). It was also suggested that the assessment of development proposals may be more complicated where heat network zones include multiple heat networks.

c) Development proposals in locations where heat networks are planned should only be supported where they allow for later connection

Some expressed their support for 11(c) and especially for the future proofing of development to facilitate the provision of heat networks. However, most of those commenting raised issues or suggested amendments. These included suggestions

to extend the scope of 11(c), for example to require all development proposals to enable future connection to a heat network if there is potential for a network to be developed in the area and even if there are no existing plans. Some specifically referenced the potential for 11(c) to provide greater demand certainty for future heat network development, including suggestions that the delivery of development proposals could encourage investment in a new heat network.

Others sought clarity around aspects of 11(c). There were calls for:

- Further detail on how development proposals are expected to allow for future connection
- Guidance on how cost effectiveness is to be determined.
- Clarity on the timescale over which development proposals should be expected to plan for future development of heat networks.

Some wished to ensure that any definitions or guidance relating to 11(c) are consistent with Building Standards. It was also suggested that planning conditions should have a role to play in the control of development proposals to ensure implementation of plans for future heat network connection.

There were some concerns about the implementation of 11(c), including in relation to the expertise and resources required. For example, it was suggested that planning authorities may not have the necessary knowledge to assess whether a development proposal would allow for cost effective connection to a heat network in the future, particularly given the potential for continuing technological development. Some also raised concerns regarding the potential for redundancy of development where the technical profile of planned heat networks change. In this context, there were calls for further guidance to inform the assessment of proposals against 11(c). Some also wished to see NPF4 make clear that any development proposals would also have to be assessed against other relevant policies.

Respondents also expressed a view that there is limited developer confidence in heat networks and saw this as a potential barrier to delivery. It was suggested that, to overcome this barrier, 11(c) should be supported by:

- Independent research into the viability of heat networks.
- Funding support.
- A statutory requirement to plan for future networks.

Other queries or suggested changes included:

- That clarity is required around the handling of cases where a planned heat network may not be commissioned in time for a development proposal, for example by giving consideration to temporary low carbon heating solutions until the heat network is in place.
- Whether 11(c) would rule out other individual low or zero carbon heating and cooling systems, for example where these may be more feasible than heat networks with a single supplier of heat?

There were also concerns regarding the in-situ performance of heat networks, and the extent to which support for this form of heating can make a significant contribution to the decarbonisation of heat.

d) Development proposals with no effective option for a heat network connection should provide alternative low/zero emission heating

Some of those commenting noted their support, but most raised issues or suggested amendments. These included suggestions to strengthen 11(d), and Policy 11 as a whole, for example to ensure that all development from 2024 onwards complies with the New Build Heat Standard, even where development has been approved prior to 2024.

Respondents highlighted several aspects of 11(d) as needing to be clarified. There were specific concerns about what is to be classified as ‘low or zero emissions heating’, and the capacity of planning authorities to assess whether a heating system is low or zero carbon. There was a call for guidance to support planning authorities, including a suggestion that this should consider the potential impact of alternative heating systems on fuel poverty. Other areas highlighted as in need of clarification included whether 11(d) would apply to changes of use, in addition to new build proposals, and whether it should only apply to proposals that are not within or near to a heat network zone.

Some respondents suggested that the relatively limited supply of heat networks could result in a substantial proportion of development proposals falling under 11(d), particularly in more rural areas. This reflected a view that 11(d) should recognise issues of heat density requirements in rural and semi-rural areas. Concerns were also raised around the development industry’s capacity to provide alternative low or zero carbon heating systems by the time of NPF4’s publication, with some seeing a need for a transition period as part of a national decarbonisation plan. Some respondents also wished to see exceptions for some types of development proposals, such as small householder extensions, proposals that do not have any heating or cooling requirements, and marine aquaculture development.

Other suggested amendments included that:

- Reference should be made to the New Build Heat Standard due to come into effect from 2024, including clarification of whether 11(d) is expected to supercede the 2024 date for implementation of the new standard.
- There should be links to Policy 6 (Design, quality and place) in relation to the importance of siting and design for heating and cooling.

It was also suggested that 11(d) could be more effectively delivered via Building Standards.

e) National/major development with waste heat should be co-located in areas of heat demand, and include a heat and power plan for use of waste heat

While some of those commenting noted their support, most highlighted concerns or suggested amendments.

Some saw a need for the refinement of 11(e) and/or inclusion of specific exceptions. There were concerns regarding the potential for the co-location of national and major development to adversely affect residential amenity and safety, and a view that this may limit the scope of this part of the policy. Some called for additional guidance on whether 11(e) anticipates the co-location of industrial and residential development.

Concerns were raised around the technical expertise required to assess the appropriateness and feasibility of planned energy recovery, and the capacity of planning authorities to identify and enforce requirements to ensure development complies with 11(e). It was also suggested that consideration of amenity, and health and safety implications of co-location, may lead to an excessive burden on developers. There were calls for clear design guidance to assist applicants, for example in relation to pipe runs, pipe work and connection. Some also suggested that effective incentives and/or remedies should be used to ensure that the heat and power plan is implemented within a reasonable period where it is technically and financially feasible to do so.

f) Energy infrastructure proposals should take account of heat maps and zoning

While some respondents expressed their support for the role of heat maps and zoning in relation to energy infrastructure proposals, most of those commenting were looking for changes.

Some respondents wanted to see 11(f) set out a wider range of considerations for energy infrastructure proposals. There was reference to national and regional infrastructure and systems, national energy strategy, and renewable and low carbon energy policy. These suggestions reflected concerns about the potential impact of development on the electricity grid, including suggestions that 11(f) should also recognise the regulated asset investment approach that applies to Distributed Network Operators (DNOs). It was suggested that DNOs should be consulted on energy infrastructure proposals where relevant.

Specific concerns were raised around support for development proposals that repurpose former fossil fuel infrastructure, and how such proposals will be assessed. For example, it was suggested that the assessment of proposals will need to balance a range of technical considerations, for example relating to technology choices, carbon savings and financial viability, with wider place and design considerations to ensure that the repurposing of infrastructure does not adversely affect communities.

Other issues raised included:

- Clarity is required regarding which developments should be included within the definition of 'energy infrastructure', including suggestions that this should exclude wind turbines and power lines.

- There is a degree of overlap between 11(f) and (h). It was suggested that the two could be merged or amended to make clear that 11(f) applies only to proposals connected to excess heat.
- Links should be made with 11(a) in relation to LHEES and heat network zoning.

g) Domestic biomass energy systems should not be supported where networked systems are available

Comments included that 11(g) is based on an assumption that connection to gas or electricity for heat is more desirable than biomass. Some questioned the validity of this assumption, suggesting that air quality should not be impacted by most modern biomass systems, and that biomass may be preferable to gas in terms of carbon emissions. Others wished to see NPF4 take a stronger stance against biomass, including calls for 11(g) to state that new biomass development should not be supported anywhere. This view appeared to reflect concerns around the potential environmental impact of biomass development, including in terms of carbon emissions.

Respondents also highlighted several aspects requiring clarification or further guidance. Clarity was sought on the range of properties to which the policy would apply. For example, respondents queried whether it would apply to the large majority of domestic dwellings with networked electricity, and whether 11(g) would apply outwith smoke control areas. Some suggested that it is not consistent with current permitted development regulations on domestic biomass burners. In this context, it was suggested that 11(g) should be delivered through Building Standards.

Concerns were raised around implementation, with respondents noting that planning policy cannot enforce network connection. It was also suggested that technical expertise will be required to assess the appropriateness and affordability of proposals. There was a particular concern around how planning authorities can determine whether a networked connection is 'available', and whether they have the expertise to assess air quality impacts.

h) Development proposals should be supported where they repurpose former fossil fuel infrastructure for low carbon energy

Most of those commenting sought clarity on aspects of 11(h), and how it will be implemented. For example, some questioned whether it supports all developments which repurpose fossil fuel infrastructure for low carbon energy, and suggested that it should set out criteria or thresholds to help identification of which development proposals are to be supported. There was a view that 11(h) provides an opportunity to prioritise development types that can support the re-skilling of workers from fossil fuel industries.

Other issues and suggested amendments included:

- 11(h) should be amended to include proposals where surplus heat will be generated, but which are not within or near to a heat network zone, and where there is no attempt to use surplus heat.
- The relationship between 11(h) and (f) should be clarified, with some suggesting they could be merged.
- 11(h) may be limited in terms of its contribution to decarbonisation of heat, if the benefit of any usable surplus heat is offset by inefficient main development proposals.

i) Development proposals should be designed to promote sustainable temperature management

There was support for referring to the potential for sustainable temperature management as way of reducing demand on the electricity grid, and to cope with anticipated increased temperatures as a result of climate change. However, most of those commenting raised issues or suggested amendments.

Calls for further detail on several aspects of 11(i) reflected a view that, as currently written, it does not provide the level of information required to promote sustainable temperature management. In addition to calls for further detail on the use of building design and positioning, respondents wished to see reference to mechanical heat recovery, ambient temperature heat networks, and blue-green infrastructure. To ensure energy efficiency and indoor air quality, it was also suggested that 11(i) should recognise that there may be a need for mechanical temperature management to support natural or passive systems in some circumstances. This included reference to building design standards such as Passivhaus and EnerPHit where natural systems alone may not be sufficient.

It was also suggested that the planning system may have limited capacity to deliver the passive heating and cooling highlighted. There was a concern that planning authorities may lack the skills and expertise to assess temperature management proposals. It was also suggested that retro-fitting existing buildings to deliver sustainable temperature management will be significantly more challenging than delivery through new development.

Other suggested amendments included that there should be:

- A greater emphasis should be placed on a fabric first approach to reduce heating and cooling requirements.
- Explicit links to relevant considerations around energy storage, siting and design, including reference to Policy 6 (Design, quality and place) and Policy 12 (Blue and green infrastructure, play and sport).
- Clarification around interpretation of the term 'occupied' for the purposes of 11(i).

It was also suggested that 11(i) would be more appropriately delivered through Building Standards.

Policy 12: Blue and green infrastructure, play and sport

We want our places to be greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport.

Question 34 – Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

Around 305 respondents made a comment on Question 34.

Most respondents were supportive of the policy, albeit that many of those who agreed, or partly agreed with the policy went on to make suggestions for change.

In terms of the breadth of the policy, it was suggested that 'blue and green infrastructure' should be separated from 'play and sport', as they are not necessarily related. For example, it was suggested that some developments may have high recreational value for the community but be of little benefit to the ecosystem. Another view was that blue and green infrastructure should also not be covered in the same policy.

Some respondents were looking for cross-referencing to the role of key agencies, including Scottish Water and SEPA, and to other policies, strategies and plans that are either likely to influence NPF4 directly or because of their impact on LDPs. Suggestions included:

- Referencing Open Space Strategies, Play Sufficiency Assessments, Local Place Plans, SuDS, Green Networks and Nature Networks.
- Highlighting that blue infrastructure requirements should align with guidance and regulations for roads.
- Referencing statutory access rights under the Land Reform (Scotland) Act 2003. This was connected to a concern that public access rights might be at risk of being undermined.

It was also suggested that clear linkages should be made between Policy 12 and other NPF4 policies, including Policy 8 (Infrastructure first).

Respondents also raised concerns about the practicality of implementing the policy, including in relation to the possible impact on local authority maintenance budgets. Other implementation-related issues raised included that:

- The policy should identify standards and an approach to assessing requirements and monitoring delivery on the ground. This should include accessibility and quality.
- It is unclear how the development management process will assist planning authorities in making sure that developers have funding in place for long-term

green and blue infrastructure. It was suggested that further guidance may be required.

- Consistent policy interpretation across local authorities requires more detail, including guidance and a methodology for delivery. It was suggested that a Geographical Information System mapping process be considered.
- Guidance is needed on how much of an allocated site should be given to blue and green infrastructure and open space.

a) Local development plans identify and protect blue and green infrastructure

Suggestions for improvement included changing or expanding 12(a) as follows:

- There should be explicit reference to the role of blue and green infrastructure in nature-based solutions and local habitat recovery and biodiversity.
- Land uses that restore nature should be favoured, with consideration given to identifying new developments that can enhance existing blue and green infrastructure.
- There should be a clear reference to the need for planning decisions and developments to protect existing local paths, including key informal routes.
- The importance of community food growing should be reflected. It was reported that this has multiple benefits around local health, wellbeing, biodiversity, food security and reducing food miles.

b) New enhanced provision/improved access to play opportunities for children

There were some concerns about blue infrastructure play opportunities for children potentially being unachievable due to health and safety issues. Others felt this policy should include specific mention of identifying and protecting 'wild spaces' available for children.

It was also observed that outdoor sports facilities are part of open space, and it was suggested that they should be included.

There was also a view that, while LDPs may reference new and enhanced play opportunities, it is more likely that the primary responsibility for these opportunities will lie with Open Space Strategies.

c) Fragmentation or net loss of existing blue and green infrastructure

Many of those commenting on Policy 12 addressed the issues of 'overall integrity' and 'net loss'. Their comments included that more detail and guidance on 'overall integrity' would be helpful, including how this will be assessed. It was also noted that local authorities will require the technical expertise to assess the integrity of networks.

There were concerns that if small amounts of fragmentation are allowed, over time the impact will be cumulative. It was suggested that the policy appears to allow support for development proposals that do not impact the 'overall integrity' of the network of blue and green infrastructure, with an associated concern that this could

mean that open spaces of importance to local neighbourhoods are lost because of their limited impact on the overall network.

There was also a concern that referring to 'net loss' would allow significant changes to blue and green infrastructure to be supported, providing there is no net loss of land.

d) Development proposals in regional and country parks

Comments included that there is no indication given of the possible scale of possible developments within regional and country parks. Some respondents observed that there should be a reference to the historic environment and also to the cultural heritage of regional and country parks.

e) Safeguarding outdoor sports facilities

There was a view that a strategic understanding of places for sport, and an evidence-based approach, will be required when assessing the need for outdoor sports facilities. There was also a call for clarity around which bodies/stakeholders will assess proposals to determine whether the thresholds set out 12(e) have been maintained or breached.

It was noted that the policy focuses on outdoor sports facilities, with some respondents highlighting the importance of indoor sports and multi-use games areas. It was suggested that where there is insufficient need for outdoor sports facilities, there is a risk that allocated land may become 'dead space'.

f) Loss of children's outdoor play provision

Some respondents felt that the lack of clear definitions at 12(f) could lead to difficulties in implementation. For example, there was a query as to whether 'provision' would extend to any open space or refers only to formal play areas such as playgrounds?

Other comments or suggestions included that:

- There should be specific mention of wild spaces and the potential loss of access to these for children in urban as well as rural areas.
- Any replacement provision should be equivalent in quantity and accessibility to the play provision that is being replaced.
- 12(f) protects children's outdoor play provision rather than the recreational value of parks and open spaces for all ages.

g) Open space, green space or play space on unused or under-used land

Comments included that not all spaces are suitable for development, for example because of safety or anti-social behaviour issues.

It was also noted that some sites may be vacant before future development takes place. A connected concern was that 12(g) could potentially result in applications being submitted by third parties for open spaces on under-used land, with the specific purpose of blocking certain developments.

There was a suggestion that the terms ‘unused’ and ‘under-used’ land should be defined.

h) Incorporating and enhancing green and blue infrastructure

There were concerns that 12(h) creates an expectation that the needs of all potential users should be met. It was suggested that flexibility and discretion will be needed, as it may not be possible to make all blue and green infrastructure accessible to all potential users. In particular, it was noted that brownfield sites may be more restricted in terms of space and may not meet be able to meet all the requirements set out.

Other suggestions included that the connections with wider green networks for people and wildlife would be strengthened if the objective of enhancing biodiversity was referenced directly.

An additional comment was that 12(h) and (i) imply that blue and green infrastructure and play/recreational space will always be provided on-site. However, it was suggested that it may be more appropriate to seek contributions to existing off-site facilities, as it is the quality rather than the quantity of open space that is important.

i) Good-quality provision for play, recreation and relaxation

There were suggestions for changes or additions to 12(i), including that:

- ‘Well-designed’ and ‘good quality provision’ should be defined.
- 12(i) should apply to all developments and that smaller developments are also important.
- The creation, restoration and enhancement of wild places close to new developments, such as community woodlands, should be considered.

j) Good-quality provision for play, recreation and relaxation

Although some noted their support for 12(j), it was also suggested that providing examples of what is meant by good-quality provision would be helpful. It was also suggested that, with the potential for conflicting views between local authority planning and roads departments to be a challenge to new home building delivery, NPF4 could assist by providing proactive solutions.

It was also noted that new streets and public spaces should be founded on the principles of Designing Streets and inclusive design, instead of only incorporating these principles. A connected suggestion was that Designing Streets should be reviewed and updated as it is now over 10 years since its publication.

k) New, replacement or improved play provision

It was suggested that the wording of 12(k) could be open to interpretation and that is wording should be reviewed. Specific points included what is meant by example, ‘stimulating environments’ and ‘inclusive’ in this context?

Other comments or suggestions included that:

- There should be guidance on the design of children's play spaces.
- The replacement of play equipment does not usually require formal planning approval and would therefore be outwith the scope of planning decisions.
- As it will not be adopted by local authorities, issues relating to the long-term maintenance and renewal of play equipment within private developments should be considered.

I) Effective management and maintenance plans

Comments about 12(l) were mainly concerned with its implementation. They included suggestions that wording such as 'maintenance' requires a clear definition and that:

- Maintenance requirements and arrangements should be set out, including in terms of which organisation has responsibility.
- Consideration should be given to funding, delivery, and long-term management of infrastructure.
- Further guidance is needed on the specific requirements for developers to maintain blue and green infrastructure.
- Development proposals should include a physical activity assessment to show how space will be used to optimise physical activity and sports opportunities, active living, and healthy lifestyles.

Other issues

Respondents also highlighted other issues that they wanted to see covered under Policy 12. For example, the importance of consulting and involving people using blue and green infrastructure and open spaces was highlighted, with specific points including that:

- Children and young people should be consulted and involved in decision-making. They should be asked to help identify what they want and need from local play and sports spaces.
- Communities, especially disabled people and others with specific access needs, should be involved in the design and development of green spaces.

Some respondents took the view that there was too much emphasis on play areas and facilities for children, and that Policy 12 should include reference to open space for all users and residents. An example given was to include adult uses for outdoor space, such as the provision of outdoor gyms.

A number of respondents commented on the health and wellbeing benefits of being in nature and the importance of semi-natural or wild spaces relative to simply open spaces. It was observed that there is no reference to wooded space or landscapes in Policy 12, and that there is an emphasis on play and sport rather than connecting with nature.

Other comments or suggestions included that Policy 12 should:

- Avoid taking a blanket approach and should be applicable to a diverse range of places, for example urban high rise areas but also rural or suburban areas.
- Acknowledge the difficulties of securing quality play areas in rural settlements where historic provision is poor, and there are a limited number of new developments coming forward to provide new facilities.
- Be strengthened in relation to climate resilience and flood risk management, as the blue and green infrastructure on its own cannot deal with these challenges.
- Require the biodiversity contribution of existing brownfield sites to be assessed as part of the application process. It was noted that the areas covered by the policy can have a high biodiversity value and provide an essential refuge for plants and wildlife.
- Recognise that blue and green infrastructure can provide soundscape advantages and has the potential to reduce noise levels. However, it was also noted that the impact of noise generated must be carefully controlled.

Policy 13: Sustainable flood risk and water management

We want our places to be resilient to future flood risk and to make efficient and sustainable use of water resources.

Question 35 – Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?

Around 255 respondents made a comment at Question 35.

While most respondents agreed with the overall ambition of developing transformative approaches to future flood risk, some were concerned about gaps in the policy or that a lack of definition and detail that could undermine its aims. In terms of this lack of detail, there was a view that more generic statements have replaced much of the detail formerly provided within SPP.

Other general concerns included that Policy 13 only addresses future development, whereas strategic, solution-based approaches are needed for areas already at risk of flooding. There was specific reference to existing urban areas. Other issues that respondents wanted to see covered included:

- How Policy 13 links to SEPA guidance, including the SEPA position statement on new buildings in flood risk areas?
- The statutory link between the flood risk management plans and LDPs, including by highlighting the importance of the former as part of the planning system. In related comments, respondents pointed out that there are no references to flood risk assessments or drainage impact statements despite these being considered to be key tools in assessing flood risk.

- Settlements on the coast subject to coastal flood risk. It was suggested that these should be included under this policy rather than being referred to only in Policy 35 (Coasts). However, others were only looking for cross-referencing to Policy 35.

There was also a view that Policy 13 is overly focused on developments in urban and coastal areas and does not consider the potential of agricultural land in flood risk management solutions. It was suggested that knowledge of farms and the rivers and land surrounding them could be utilised to understand the key issues and identify workable solutions.

Suggestions for other points that could be referenced included:

- Water conservation as part of water management, including rainwater harvesting, greywater recycling and water abstraction for non-domestic purposes.
- Foul drainage, to ensure sewerage provision is strategically planned and maintained.
- That Policy 13 sits alongside Policy 33 (Peat and carbon rich soils), since restoring these areas can help alleviate downstream flooding, as well as storing carbon.
- The issue of land raising. However, there was also a view that a land raising approach should be avoided.
- How SuDS and other measures contribute to broader strategic goals, such as LBAPs.
- That Building Standards have a role to play in terms of ensuring the use of flood resilient construction techniques.

Other general comments included that further evidence is required to demonstrate how effective specific flood prevention measures are in reducing the impact and financial costs. It was suggested that this will give homeowners, business owners and insurers the confidence that installing specific measures will be worthwhile.

Respondents also highlighted a number of issues relating to the role of biodiversity and nature-based solutions, including that:

- There could be greater recognition of the climate change agenda, with Policy 13 building on strategic links to the 26th UN Climate Change Conference (COP26), climate change and nature-based solutions.
- When designing natural flood management systems, early consideration should be given to how they can contribute to broader aims, including local biodiversity plan priorities. Nature-based solutions for managing issues such as air quality and flooding should be the norm. 'Hard' defences should be the last line of defence.
- Upstream land use and development can prevent flooding from becoming an issue. For example, including long-term (retention) woodland creation in upstream riparian zones, allowing wetlands to be wet instead of draining.

- Green roofs should be included as a drainage solution, as they slow the flow of water to the sewerage system, insulate buildings and support policies on green infrastructure.

Finally in terms of general themes, some respondents commented that planning services will need to be resourced, including having staff with specialist skills, to ensure that technical reports, such as drainage impact assessments and flood risk assessments, can be assessed.

a) Strengthening community resilience to the impacts of climate change

Although the emphasis on strengthening community resilience was welcome, it was suggested that the meaning of phrases such as 'development proposals' and 'community resilience' are unclear.

It was noted that the policy promotes the use of natural flood management but that there is no further detail. Queries included whether the approach is expected to be part of a more comprehensive promotion of re-wilding and biodiversity improvements, along with how it would be resourced.

It was suggested that 13(a) should also cover flood risk management plans, river basin management plans, and strategic flood risk assessments.

b) Development proposals and Future Functional Floodplain

A general observation was that the term 'Future Functional Floodplain' needs to be defined.

There were concerns about whether this protection standard is achievable, and some respondents felt that the policy is overly restrictive. Some respondents reported that the application of the Future Functional Floodplain would significantly reduce the land available for development. The associated concern was that applications will be refused as not meeting future flood risk requirements. There was a call for some flexibility and leeway in terms of how 13(b) would apply to local contexts.

There were also concerns that particular floors of some developments may not be used because of the potential for flooding, and that this could result in 'dead' frontages. It was suggested that the requirement for any utilised floor to be above the future flood level, plus an allowance for freeboard, should be restricted to the most vulnerable uses, with the least vulnerable uses being allowed below this level.

c) Small scale extensions and alterations to existing buildings

There was a call for clarification on what is meant by both 'small scale' and 'significant effect'. It was also suggested that the method by which a planning authority or developer could demonstrate compliance is not clear.

There was also a call for 13(c) to address the impact of urban creep. There was specific reference to impermeable hardstanding in private gardens and it was suggested that it can create drainage issues in adjacent roads and gardens and can increase flood risk.

d) Most vulnerable and civil infrastructure

It was noted that there is no definition of 'most vulnerable' or 'civil infrastructure' and that what is meant by 'additional measures' also needs to be explained. In terms of these 'additional measures', there were also queries relating to how a planning authority or developer will demonstrate compliance?

It was also suggested that 13(d) is no longer required, as a new area of avoidance is proposed as the future floodplain.

e) Instances where development proposals should not be supported

Some respondents commented that they were unsure what 13(e) means in practical terms. It was suggested that it reads as if developments cannot increase discharge into the public sewer network, but that this would be unreasonable. It was also suggested that further consideration is given to the acceptability of surface water connections to the public wastewater network in limited, exceptional circumstances.

There was a concern that local authorities do not always have the expertise to assess and comment on the risks relating to 13(e) and that this could mean that mitigation may not be as robust as it should be.

f) Avoiding increased surface water flooding

Comments on 13(f) often related to SuDS and included suggestions that:

- To manage drainage and water quality, development proposals should be required to integrate well-designed and naturalised SuDS features.
- It is not clear how SuDS will be used to maximise positive effects for biodiversity, for example, by identifying the best species and long-term management for each site.
- A requirement for a fully costed maintenance plan to be provided with any SuDS proposed for new development should be included in the policy.

Some respondents also noted that 13(f) refers to minimising the area of the impermeable surface but that this is not enforceable.

g) Connection to public water mains

Comments and concerns about 13(g) were primarily focused on its potential impact in rural areas. They included that it potentially creates restrictions in rural areas where connections to the public water network are either unavailable or prohibitively expensive. Some respondents observed that there is no robust policy compelling development to connect to the mains network, and that this will require to be looked at on a case-by-case basis. Other comments included that:

- In times of drought, the responsibility would fall to the local authority to pay for and supply water if a development was not connected to the mains.
- Including SEPA's groundwater abstraction guidelines for private water would be helpful.

h) Natural flood risk management and blue-green infrastructure

It was suggested that 13(h) should be linked more clearly to Policy 12 (Blue and green infrastructure, play and sport), recognising that naturalised and accessible design is critical to delivering environmental and social benefits and that natural flood prevention can provide more comprehensive benefits in terms of the nature crisis, habitat creation, high-quality places and green spaces.

Policies 14 and 15: Health, wellbeing and safety

We want places to support health, wellbeing and safety for all, and to strengthen the resilience of communities.

Question 36 – Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

Policy 14 Health and wellbeing

There was support for health and wellbeing being part of the planning process, and an appreciation that the planning system could do more to support healthier places and tackle health inequalities. Most of those commenting were in broad agreement with the aims of the policy, while at the same time having a number of detailed suggestions about how the policy could be clarified or amended.

A number of respondents commented that it should be stated explicitly that development proposals that will be detrimental to active lifestyles, health and wellbeing will not be supported. Others observed that the policy seeks to tackle such complex, cross-sectoral issues that it might be better as one of the NPF4 Universal policies, making it an overarching policy principle for all development.

In terms of cross-sectoral issues, it was noted that the implementation of Policy 14 will require planning services to work closely with the Health and Social Care Partnerships to deliver health and social care infrastructure. It was suggested that health and social care assessments will be required to evaluate the needs of the population locally, and that these should have a particular focus on the needs of older and vulnerable people.

It was also suggested that Policy 14 should be cross-referenced to a number of others, including Policy 6 (Design, quality and place), Policy 7 (Local living), Policy 9 (Quality homes), Policy 12 (Blue and green infrastructure, play and sport), Policy 18 (Culture and creativity), and Policy 32 (Natural places).

Other comments focused on additional issues that respondents wished to see covered by the policy. These included:

- The Place Principle and its role in engaging communities in decision-making and planning. It was suggested that this approach can have a positive impact on individual and community resilience.
- Consideration of the health of the natural environment, recognising the role nature plays in wellbeing.

- Specific reference to mental health, including its relationship to the environment and active health.
- Recognition that engaging with arts and cultural activities has positive effects on health and wellbeing.
- The creation of a healthier food environment, including access to affordable healthy food. Some saw this as a significant omission from the policy, with food described as a key factor to health and wellbeing.

A number of respondents commented that good quality housing is central to physical and mental health. In particular, it was noted that for many older or disabled people, safe and accessible homes can help reduce falls, enhance the quality of life and enable people to continue to be part of their community. A related view was that the pandemic has shown the importance of the local community to wellbeing. There was reference to connected places and communities, with good transport links and access to public services being vital for the wellbeing of local residents.

a) Vibrant, healthier and safe places/tackling health inequalities

While the ambition to tackle inequality was welcomed, some respondents felt that clarity and direction were needed on the expectations, duties and responsibilities being placed on planning authorities. It was again noted that a cross-sectoral approach will be required to successfully deliver this policy.

There were a number of suggested changes, including:

- Adding clear definitions, with an explanation of what is meant by 'infrastructure' being the most frequently requested. The meaning of the phrase 'significant adverse health effects' was also queried, and there was a call for more detail about how this will be assessed.
- Referencing the Place and Wellbeing outcomes developed by the National Place and Wellbeing Collaborative.
- Placing more emphasis on the importance of healthcare facilities and infrastructure. However, there was also a view that it is important to acknowledge that good health and wellbeing are about much more than the provision of NHS facilities.

Other respondents felt that the policy should address the role of green and blue infrastructure in creating healthier places and reducing health inequalities. A related comment was that it could be expanded to include a requirement for development proposals to show how their design would enhance access to the natural environment and green spaces.

b) Avoiding adverse health effects

Most of the comments on 14(b) related to the proposal for a Health Impact Assessment (HIA) for certain categories of development. A number of respondents felt that the intention is not clear, including in terms of what an HIA is and what would constitute a 'significant adverse health impact'? There were also questions about whether this is an appropriate issue for planning authorities to consider.

A number of respondents were looking for further guidance on HIAs, including to ensure that a consistent approach is taken between areas. An associated concern was that if planning authorities do not have the resources and skills needed, this could lead to delays at the planning application stage.

Other comments addressed when an HIA should be required and included that:

- They should be required for all development proposals, the rationale being that this could make a significant difference in creating more inclusive communities and to avoid exacerbating inequality.
- In contrast, that applying a blanket requirement to produce an HIA seems disproportionate and, potentially unlawful. There was a call for case-by-case decisions, with planning authorities setting their own thresholds.

Respondents also highlighted the need for planning authorities, working with Health and Social Care partnerships, to ensure that there is an appropriate level of health provision for those moving into new housing developments. It was reported that considerable investment in health and social care facilities can be required in order to support growing and ageing populations.

Other issues raised about HIAs included that:

- There is a lack of clarity on the circumstances where the requirement for an HIA would apply to smaller developments, below 50 homes.
- It was not clear if both physical and mental health are to be included.
- There should be an explanation of the relationship between HIAs and EIAs.

c) Air quality

Although those commenting tended to agree that development proposals that would have a significant adverse impact on air quality should not be supported, there were also comments about how the proposed approach could be changed or clarified.

These included that it would be helpful to define 'significant adverse effects on air quality' and also to explain:

- Who would make any determination?
- How a planning authority or developer would demonstrate compliance?

Respondents also observed that 14(c) does not require air quality assessments to be undertaken. There was also reference to ensuring that cumulative impacts are considered as part of the assessment process.

In terms of particular issues that need to be considered or addressed at 14(c), including because they can have a detrimental effect on good air quality, respondents highlighted:

- Biomass power stations. There was reference to the health and air quality impacts of wood-burning.

- Domestic retrofit installations of heating and cooking systems, such as the installation of log burners.
- Incinerators.
- Mineral extraction, due to air quality and safety concerns during operations and including the use of explosives.

Final observations included that 14(c) as currently set out is not consistent with the provisions of Cleaner Air for Scotland 2. There were also suggestions that air quality should form a standalone policy.

d) Noise

Respondents sought a definition of 'unacceptable levels of noise', and clarity on who would make a determination and how a planning authority or developer could demonstrate compliance. Other comments and suggestions included that:

- The terminology used in 14(d) should be consistent with that of PAN 1/2011.
- A flexible approach may be required around vacant and derelict land. It was noted that these sites are often close to noise emitters such as railway lines and roads.
- The policy should specifically reference wind farm planning applications and state that noise assessments for wind farm developments should be carried out using The Assessment and Rating of Noise from Wind Farms (ETSU-R-97).
- Where areas already have unacceptable noise levels it may not be possible to mitigate their adverse effects. It was suggested that the Agent of Change principle should be referred to.
- Other amenity issues such as smell, vibration and light pollution could be included.

There were also some concerns that 14(d) could conflict with others. For example, it was noted that sports pitches create additional noise, and it was suggested that planning authorities should be able to apply balance and weight to noise-related considerations.

e) Local community food growing/allotments

The inclusion of a policy supporting developments that would allow for community food growing and allotments was welcomed. Associated comments included that the approach could help support habitat restoration, as well as complement efforts to improve health and wellbeing.

Comments of the scope of 14(b) included that it should make community food growing a requirement in certain developments. Associated suggestions included that:

- 14(b) needs to set a threshold for when food growing, or allotments, must be provided.

- All development proposals over a certain size (50 households) must include a statutory space for food growing that can then be shaped and developed by the community to suit their growing needs.

Another issue raised was that, as currently worded, 14(b) could suggest that any development proposal that includes allotments would be supported, irrespective of other material considerations. It was suggested that the policy should be reworded to prevent it from being used as a loophole for inappropriately sited development.

Policy 15 - Safety

There were a number of specific comments in relation to development proposals in the vicinity of major accident hazard sites. It was observed that an explanation of the phrase ‘applications regarding the presence of hazardous substances’ is required, alongside guidance on the relative weight and considerations a planning authority or developer should apply to demonstrate compliance with the policy.

Other comments on Policy 15 included that it is not a general policy on safety but relates to specific land uses and hazards of those uses. It was suggested, therefore, that it might be better placed in policies that cover relevant business and/or infrastructure issues.

There were also a number of issues about which clarity was sought, including the meaning of ‘in the vicinity of a major incident hazard site’ and ‘other things, where not covered by the Health and Safety Executive’. Respondents also highlighted other issues they wanted to see clarified or covered, including:

- Beyond the Health and Safety Executive and the Office of Nuclear Regulation, who are the ‘additional consultees’ expected to be?
- There should be reference to the Health and Safety Executive’s land use planning methodology and decision matrix.
- The policy should include reference to the safeguarding of major accident hazard pipelines.

It was also suggested that it would be helpful to include more detail on the factors to be considered in assessing any application, such as the increase in numbers of people exposed to risk, regeneration and economic benefits, the existing permitted use of the site or buildings, and the impact on industrial sites and pipelines. It was suggested that for hazardous substance consent, factors to be considered should include the siting and methods of storage, the quantity and type of materials, and constraints that may be placed on future development.

In relation to types of development, it was suggested that developments that are not major accident sites and are not covered by SEPA consent or licensing agreements, but which do involve high electrical energy or the potential for large-scale fires, should be included. In particular, it was suggested that fire risk assessment, emergency fire response, fire detection and fire control, and shutdown measures should be specified before developments are approved.

Part 3 - National Planning Policy, Productive Places

Eight policies are included under the Productive places theme.

Policy 16: Business and employment

We want our places to support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy.

Question 37 – Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

Around 220 respondents made a comment at Question 37.

Overall, there were mixed views on the policy. While there was general support for its ambitions, including the linking of investment with the transition to net zero, supporting a nature positive economy and the focus on community wealth building, there were concerns that the policy, as it currently stands, will not achieve its aims.

In terms of issues that respondents wanted clarified, there was reference to what is meant by 'wellbeing economy', 'net economic benefit', 'green jobs' and 'community wealth building initiatives'.

There were also calls for guidance on how critical aspects of the policy, such as net economic benefit, could be demonstrated and assessed. Respondents observed that there is guidance on evaluating and defining housing land requirements, but there is no equivalent methodology for land for business and employment uses. It was also noted that in contrast to SPP there is no mention of business land audits as a tool for monitoring the delivery of new development on employment land.

Other general suggestions included that:

- The policy should be strengthened to clarify that land planning decisions and investment in new business and economic development opportunities are inextricably linked. Allied to this, there was a call for Policy 16, and NPF4 more widely, to be aligned to the NSET.
- Enabling localised approaches would allow for economic differences across local authorities, while also acknowledging land use pressures and the needs of their communities.
- The 'Seed Planning' planning and design approach could be referenced as a way of enabling a building to fulfil multiple uses throughout its life.

Other themes that respondents wanted to see covered under Policy 16 included:

- Digital infrastructure and connectivity, with links made to Policy 23 (Digital Infrastructure).

- The potential of mixed-use sites, including around increasing site viability.
- The role of businesses providing circular economy services.
- Support for agriculture and forestry, and allied processing facilities.
- Renewable energy provision, including the potential for businesses to investing in self-generation to meet the energy needs.

It was also suggested that Policy 16 should note that brownfield sites are not always a viable option for development without very significant long-term remediation or infrastructure investment. It was seen as important that the policy acknowledges that sustainability is about more than protecting greenfield sites.

a) Supporting a greener, fairer and more inclusive wellbeing economy

Most of those commenting agreed with this policy, although respondents were looking to have some terms defined, including 'greener', 'fairer' and 'inclusive wellbeing economy'. There was also a call for guidance and best practice on how 16(a) is to be supported by LDPs.

Other suggestions included:

- 16(a) could enable LDPs to better recognise the intermittent and dispersed nature of economic development in island and rural communities.
- Circular economy business models could be encouraged, including through a requirement for developers to set out how their building designs are intended to ensure longevity and adaptability.
- Complementary uses that aid employment and business areas, but which fall outside the employment use classes, should be considered.
- The food environment, in terms of internal catering in businesses, should be referenced. The wider food environment should also be considered.
- 16(a) should consider opportunities for creative industries and cultural workspaces, including film studios and artist studios.

b) Business and employment uses

Some respondents commented that it is not clear why 16(b) is asking for evidence of net economic benefits for business and employment uses on already allocated sites. It was also noted that assessing environmental impacts is part of determining a planning application, through the SEA.

It was also suggested that the reference to net economic benefit raises questions about how it would be assessed, who would carry out the assessment and whether or not developers would be required to prepare an economic appraisal of proposals?

Other comments were that:

- 16(b) does not refer to protecting industrial areas from non-conforming uses.
- There is overlap between 16(b) and (d), and this could cause confusion.

c) Home-working, live-work units and micro-businesses

There was overall support for this policy, including because of the growing importance of home and hybrid working, especially in the light of COVID-19. There was also support for the recognition that a flexible approach for rural areas will be required.

Respondents also commented on the importance of high quality digital and fibre broadband infrastructure for home working, including that this is generally a bigger issue for rural, rather than urban, areas. It was suggested that full internet and mobile phone coverage will be required if 16(c) is to be delivered.

In terms of suggested additions to the policy, the following were highlighted:

- A clear definition and/or guidance on home-working for planning purposes is required.
- Community and social businesses should be referenced, as should the crofting model.

Some respondents expressed concerns about the reference to live-work units, including that they can, in effect, become dwellings with all the resultant impacts. Similarly, it was suggested that while micro-business and home working should be encouraged, they could conflict with NPF4's Sustainable places aims if a business expands. It was also noted that incremental growth can be difficult to control.

d) Business, general industrial and storage and distribution uses

Comments on 16(d) included that 'other employment uses', 'area' and 'primary business function' all need to be defined. There were also suggested additions to the policy, including reference to Employment Land Audits.

Other comments included that supporting employment uses alone is too limited. It was noted, for example, that the current wording would not cover energy or data storage facilities.

It was also suggested that 16(a) and (d) could be combined, although there was also a concern that neither currently refers to protection for existing business and employment sites from alternative uses such as retail and leisure.

e) Site restoration

Although there was some support for this 16(e), with the proposal that site restoration should be set out in conditions considered helpful, it was also felt the policy could be more robust. There was concern that the wording is vague, in particular around what 'appropriate instances' might be.

It was also suggested that conditions are only part of the solution and that financial guarantees are needed to ensure restoration works can be implemented. Respondents requested more details on the mechanisms that would ensure restoration. A small number of respondents with experience from former mining activities cautioned that setting up the funding mechanisms to pay for restoration can be both challenging and time-consuming.

f) Business, general industrial and storage and distribution uses outwith areas identified for those uses

Comments on 16(f) included that it does not reflect the plan-led approach found elsewhere in NPF4. It was suggested that the policy is overly weighted in support of development proposals for business, general industrial and storage and distribution uses in areas. Other concerns were that it could undermine designated employment sites, risking the limitation of future development options. In response, it was suggested that a test or evidence that there are no other suitable or unallocated sites should be required.

Another perspective was that the policy is appropriate for urban areas but less so for rural settings. It was suggested that there be a reference to Policy 31 (Rural places) as this covers all developments in rural areas, including business and employment uses.

Other comments included:

- 16(f) provides some flexibility for new sites to come forward for development but does not mention sustainable economic growth. Sustainable economic growth was described as a principal policy for SPP, and there was a call for it to be carried forward into NPF4.
- The sustainability of location should be referenced. It was suggested, for example that if employees rely on private cars to get to their place of work, there is a conflict with a number of other NPF4 policies.
- The wording 'no unacceptable impacts upon the natural environment' is vague and raises the potential for disagreement. For example, the planning authority may have a different view to the community on what is unacceptable.

g) Other issues for development proposals to take into account

Some respondents questioned whether this part of the policy is required, with further comments including that it is not comprehensive and also duplicates 16(d) and (f), along with some other Part 3 policies.

In terms of issues that respondents wanted clarified, there was a question about what is meant by 'population health and wellbeing, including inequalities', and how this would be assessed.

Comments about the reference to environmental quality included that the impact on biodiversity and wildlife must also be considered. The inclusion of the historic environment as a consideration for development proposals was welcomed, although it was suggested that the reference is not necessarily consistent with other NPF4 policies.

There were also other themes that respondents wanted to see referenced, including:

- Rurality. It was noted that some planning authorities have specific business development policies for rural areas.

- 20-minute neighbourhoods, and the potential for business and industrial estates to provide opportunities to promote sustainable travel.
- Traffic management and infrastructure development.

Policy 17: Sustainable tourism

We want our places to inspire people to visit Scotland, and to support sustainable tourism which benefits local people and is consistent with our net zero and nature commitments.

Question 38 – Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

Around 230 respondents made a comment at Question 38.

Whilst most respondents recognised the importance of sustainable tourism and supported the key principles set out, many went on to comment on the detail of Policy 17.

a) Supporting the resilience of the tourism sector

There were mixed views about the proposal that LDPs should be used to support the tourism sector and identify proposals for tourism development. There was a query about how an LDP would identify proposals for tourism developments, while others suggested that it is not the role of the LDP to identify all tourism projects, including with the sector constantly changing in response to market forces and trends.

There was also a concern that 17(a) appears to be primarily focused on encouraging new tourism development. Other observations about 17(a) included that it is not clear which 'sector driven tourism strategies' should be considered. It was also suggested that definitions of 'support' and 'resilience' are required, and that reference should be made to the Scottish Tourism Alliance and Scotland Outlook 2030.

b) New or extended tourist facilities or accommodation

Some respondents commented that 17(b) should refer to landscape and other environmental considerations, along with the impact that tourism can have on them. It was noted that there is no mention of any requirement to mitigate against adverse effects on landscape and the environment, despite the necessity to balance the needs of the local economy and the protection of sensitive environments.

It was suggested that an additional criterion should be added, indicating that all proposals under 17(b) will be required to ensure compliance with other relevant planning policies. It was also suggested that stronger links should be made to other policy sections in the NPF4, including to the Distinctive places theme.

A definition of 'viability, sustainability and diversity of the local economy' was requested, along with details on how a planning authority or developer would demonstrate compliance.

There was also a comment that planning authorities would have to identify whether 17 (b) or (c) applies to their LDPs, as there are different approaches for pressured and non-pressured areas.

c) Environment/quality of life/health and wellbeing issues

Comments on the definition of 'environment' included that it should be expanded to cover both the natural and historic environment. It was suggested that this would reflect the importance of both to tourism in Scotland.

Respondents were also looking for more detail on how the impact on quality of life and the wellbeing of communities could be assessed. An associated comment was that those making a livelihood from tourism might have a different perspective from other local residents.

Other suggestions included that further information on 'adverse impacts', including how they would be measured and monitored, would be helpful. There were also questions about what would be considered as 'satisfactory measures' to alleviate effects.

Finally, there was a query about how upgrades in facilities, such as parking, would be paid for and if this would be the responsibility of developers, for example, through developer contributions. More generally, it was suggested that the 17(c) should also refer to infrastructure capacity as a consideration.

d) Proposals for huts

There was support for the inclusion of huts at 17(d). Reasons included that they could boost the supply of holiday lets, leaving other housing for local communities, and that they are an opportunity for investment in sustainable visitor accommodation. Other benefits cited were that hutting enables people to spend time in nature, develop a sense of community and reconnect with wildlife and the outdoors.

However, others were less clear about the benefits of 17(d), or expressed specific concerns. These included that:

- Huts are less for commercial tourism usage and are more leisure-focused. A related comment was that it is unclear why there is a national policy on huts and hutting development while other leisure pursuits are considered collectively.
- It is important to ensure huts are sited appropriately and used short-term due to the lack of amenities. It was suggested that the location of huts must comply with an LDP's development/spatial strategy and policy related to siting and design.

- Sensitive and important habitats such as ancient woodland should not contain new built structures, as the physical footprint of these structures and indirect impacts from human presence, could be harmful.

It was also suggested that Scotland's National Parks should be treated differently from other areas. There was reference to the high biodiversity importance of these areas meaning that huts could have a significant impact on sensitive species and could undermine attempts to halt and reverse the biodiversity crisis.

There was also a call for further detail on the requirement to comply with good practice guidance.

e) Short-term holiday letting

Some respondents supported 17(e), with further comments including that well-managed short-term lets are essential to tourism in rural areas. It was also suggested that the policy could alleviate some of the negative impacts of short-term lets on communities and local housing supply. However, others felt that 17(e) does not go far enough to tackle the reduction of available housing stock for local people, particularly in remote and island communities.

In terms of points or wording that respondents wanted clarified, the following points were made:

- 'Unacceptable impact' and 'local economic benefits' need to be defined.
- The difficulties in demonstrating that local economic benefits would outweigh the loss of residential accommodation need to be addressed. Some respondents were looking for guidance, but others expressed doubts about whether national guidance would be effective, given the varied contexts.

Other suggestions included that Short Term Let Control Area Orders (SLCAOs) should be further developed. It was also suggested that Planning Circular 01/2021 - which sets out the detail on SLCAOs, should be referenced.

Further suggestions included that:

- It is not clear when the use of residential properties for short-term letting (outwith SLCAO) becomes a material change of use. It was suggested that the NPF4 presents an opportunity to clarify this issue, including specifying the number of days a property could be let for without a material change of use.
- Consideration should be given to the potential negative impact on agritourism. It was suggested that there should be no further short-term let regulations until the cumulative effect of current licensing and control areas has been fully analysed.
- Second homes should be made the subject of a separate use class designation to allow communities and local authorities to control the numbers of second homes in their areas.

Concerns were also expressed about implementation and the resourcing challenges, particularly in relation to the monitoring and enforcement of 17(e).

f) Change of use of a tourism-related facility

Most of the comments on 17(f) were around points for clarification. They included that:

- What is meant by 'tourism-related facility' is unclear. It was assumed that it covers hotels and visitor attractions, but that it was less clear whether it is intended to extend to other venues including restaurants, licensed premises, and leisure developments such as cinemas, bowling alleys, entertainment complexes and theatres.
- 'No longer viable' will be challenging to assess without further definition.

g) Other issues to take into account in development proposals

Comments at 17(g) included that a definition for 'tourist facility' would be helpful. There were queries about what is meant by 'what hinders the provision of homes or services', along with how this will be assessed. It was also suggested that the criteria for how developments should contribute to employment and community wealth building should be more robust.

In terms of other issues that respondents would like to see referenced, the following were highlighted:

- The impacts of tourism on the historic environment.
- Infrastructure and its impact on the natural, built or historical environment.
- Carbon emissions and biodiversity.
- Sustainable locations and accessibility by active travel.

Respondents were also looking for confirmation that restrictions on traffic generation from developments would also apply to tourist facilities and for more explicit statements on other transport issues, including around transport options in rural areas and the importance of the road network.

Policy 18: Culture and creativity

We want our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity.

Question 39 – Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

Around 160 respondents made a comment at Question 39.

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

In terms of general issues that respondents wanted clarified, there was reference to:

- The expected role of planning authorities and which parts of the cultural and creative sector they are expected to engage with.
- The lack of criteria to be used when considering applications for new arts or cultural proposals.

It was suggested that Local Place Plans could play a role in identifying existing facilities, gaps and opportunities in local areas.

Respondents also highlighted a number of issues they would like to see covered, or given greater coverage, under Policy 18. These included:

- Alignment with A Culture Strategy for Scotland 2020.
- How children and young people can be involved in decisions about the types of cultural spaces available.
- The role of museums, including as a central part of the culture infrastructure.
- Parks, gardens and other green spaces, as cultural assets with an essential role to play as part of our cultural heritage.
- Grassroots music venues.

a) Opportunities for jobs and investment in the creative sector

Respondents who commented on 18(a) were often looking for further information on how LDPs should 'recognise and support opportunities for jobs and investment in the creative sector'. There were also questions about how representatives of the cultural sector can engage with LDPs.

There were calls for a clear definition of what 'recognition' and 'support' mean for land use policies in LDPs.

b) Provisions for public art

It was reported that it is difficult for the planning system to make provision for public art because of its non-essential nature and the need to satisfy the tests prescribed in Planning Circular 4/1998: The Use of Conditions in Planning Permissions and Planning Circular 3/2012 (Revised 2020) (Planning Obligations and Good Neighbour Agreements).

With specific relation to 18(b), some respondents commented on the lack of definition of 'public art' and queried why it was being limited to public open spaces. They noted that public art could be incorporated into buildings or other developments and be at any scale. Examples given included design detailing of a prominent building or reinstatement of a historic shopfront. Respondents were also looking for a definition of 'open spaces', along with detail on the scale and type of spaces being referred to.

Other respondents considered that consultation and engagement with communities should occur before public art developments are agreed, particularly where the

development relates to a public or community space. It was suggested that development proposals should also consider how to consult the arts and creative community.

A small number of respondents suggested amending 18(b) to include heritage and history as well as public art, including provision for heritage interpretation where appropriate.

c) Creative workspaces and other cultural uses

There was general support for this policy on utilising vacant spaces and property, along with some comments on how the policy could be strengthened. The focus on temporary use was queried and it was suggested that opportunities for the reuse of land/buildings longer-term would benefit tenants and owners.

Other suggestions included that:

- 18(c) should include a requirement that proposals be balanced against any negative impacts, particularly on amenity and transport, based on assessment against other development plan policies.
- It would be helpful to have a locational test for site allocation, along with criteria for development management to assess applications.
- A definition of 'creative workspaces' would be helpful.

Respondents were also looking for guidance on 18(c), including around incorporation within the use classes order.

d) Loss of arts or cultural venue

Respondents were broadly supportive of the policy, but also queried some aspects of 18(d). For example, there was a question about which types of creative industries would be covered and how cultural activities would be distinguished from tourism activities. Respondents also asked whether developers would need to produce viability appraisals, and if so who would pay for them and assess them?

There were also suggested additions, including that 18(d) should:

- Include other community facilities that can make a significant contribution to the cultural life of places.
- Highlight that the need to protect arts and cultural venues should apply equally to the spaces used by community arts groups, such as village halls, scout huts and libraries. It could also note that the loss of public halls can contribute to poor cultural provision in rural areas.
- Reference loss or damage to assets of significant heritage value. It was suggested that heritage significance is reasonably well covered, but that cultural meaning receives less coverage.

Respondents also highlighted certain words or phrases that they wanted defined, or where they were looking for further information. These included:

- What constitutes an ‘arts or cultural venue’? For example, does it include pubs and clubs which host live gigs?
- How would the ‘loss or damage to assets or objects of significant cultural value’ be defined, measured and assessed? Would a change of use which preserves the venue, but not the original use be acceptable?
- Further guidance is required on ‘evidenced by consultation’, including on the type and scope of consultation.
- ‘Sustainable demand’ should be defined. It was noted that at present it appears to focus on the market demand for culture.
- What level of evidence will be required to demonstrate that there is no longer a demand for the venue?

Some respondents queried the time period connected to the lack of sustainable demand. Connected comments included that the justification for the 12 months quoted at 18(d) is unclear and that a more appropriate timeframe might be three years. It was suggested that this longer timeframe would allow an adequate time for peaks and troughs in demand to be considered.

The inclusion of consultation with the community was seen as helpful, but there was a call for further direction on the type and level of consultation required. There was also a question about who is to be consulted – for example it is the public or those who might hire a venue. It was also noted that adaptation of a venue might be suitable for one user but not another.

There were a number of specific comments on the Agent of Change Principle, including that:

- It should be cross-referenced to the noise issues covered under Policy 14 (Health and wellbeing).
- The glossary definition of an Agent of Change should be amended. It currently limits the agent of change principle to 'residential development' rather than 'noise sensitive development' as described in Section 41A of the Town and Country Planning (Scotland) Act 1997.
- PAN 1/2011: ‘Planning and Noise’ and Circular 4/1998: ‘The Use of Conditions in Planning Permissions’ could be updated to reflect the 'Agent of Change Principle' and the requirements of Section 41A of the Town and Country Planning (Scotland) Act 1997.

Policy 19: Green energy

We want our places to support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045.

Question 40 – Do you agree that this policy will ensure our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045?

Around 310 respondents made a comment at Question 40.

In terms of an overall balance of opinion, respondents were relatively evenly divided between those who thought Policy 19 as drafted will meet the stated objectives and those who thought it would not. Some responses were both long and complex, suggesting significant or detailed amendments to the content or drafting of the policy.

Suggestions with respect to the title included that 'Green Energy' should be replaced with 'Renewable Energy', and that the title could be reworded to reflect the policy's focus on energy generation and storage.

Comments on the wording of the introductory paragraph included that the specific reference to the onshore wind sector could inadvertently reduce support for other renewables developments, such as the potential for offshore wind and tidal energy generation within the life of the framework. It was also suggested that it is not clear that onshore wind will play the biggest role in delivering the benefits identified. Clarification that onshore wind will be the predominant form of green energy within the parameters of NPF4 and the Scottish planning system was also suggested – off-shore wind energy being regulated by a separate, statutory marine planning process. A further suggestion was that, as well as support for continued expansion of low-carbon and net zero energy technologies, this paragraph should reference ceased support for the use of fossil fuels.

Other general points included that Policy 19 should be consistent with or should cross reference other plans, policies and strategies including:

- The Energy Strategy Position Statement.
- Renewable and Low Carbon Energy Policy.
- LHEES.
- The proposed Heat Decarbonisation Implementation Programme.
- The Heat in Buildings Strategy.
- The Land Use Strategy.
- RLUP pilots and frameworks.
- The Scottish Hydrogen Action Plan.
- Other NPF4 policies, particularly Policies 2 (Climate emergency), 3 (Nature crisis), 5 (Community wealth building), 8 (Infrastructure first), 11 (Heat and cooling), 32 (Natural places) and 33 (Peat and carbon rich soils).

With respect to transmission and distribution infrastructure it was suggested that, as these are referenced in the introduction but then not in the policy text, it is not clear whether they would be considered under Policy 19. Capacity issues were highlighted – in terms of grid capacity, manufacturing capacity and landscape capacity – with suggestions that it is not clear how the target of generating an additional 8-12GW of energy from renewable technology has been arrived at, or will

be delivered. It was argued that the Scottish Government should set out the country's capacity for additional wind farms before setting any targets.

Some 'Energy-related supplier, developer, association or body' respondents expressed concerns that Policy 19 will not ensure continued expansion of low carbon and net zero energy technologies to the level envisaged in the draft Onshore Wind Policy Statement, or that Policy 19 as drafted is inconsistent with other Scottish Government renewable energy policies. It was argued that it will not deliver on the overarching climate change objectives unless delays in the consenting system are addressed.

Clarity of definitions

A lack of clarity around some of the language used in relation to Policy 19 was highlighted, with a suggestion that this could make for a longer and more unpredictable planning process for developers. Specific suggestions included alignment of terminology used in NPF4 with other climate change legislation. There were also calls for greater clarity on what constitutes:

- 'Renewable energy' and 'low carbon fuels'. Concerns were raised that lack of clarity on this point could lead to permissions for new wood-burning biomass plants.
- 'Small scale' generation.
- 'Unacceptable' impacts.

Other themes to be covered

Respondents also noted a number of other topics that they had expected or would like to see in Policy 19, including:

- Reducing demand via improved energy efficiency/conservation.
- Energy supply and adaptation for existing buildings.
- Hydrogen production, storage and distribution and hydrogen production specifically in association with windfarms.
- Production of low carbon gases such as bio-methane.
- Planning presumption against new medium-sized and large-scale wood burning plants.
- Phasing out the incineration of waste.
- Hydro electricity generation and pumped hydro storage.
- Offshore energy generation, including tidal stream and wave energy.
- Greater emphasis on geothermal energy.
- Support for small nuclear power plants.
- Explicit support for development required to provide supporting infrastructure for green energy developments.
- Support for port infrastructure to facilitate offshore green energy projects.

- Support for the sustainable redevelopment of existing carbon-based energy generating infrastructure and sites.
- Local wood energy.
- Decentralisation.
- Growth and large volume roll out of domestic green energy.
- Heat pumps.
- Community ownership of renewables developments.
- Community benefits from a more equitable system of developer contributions.
- Consideration of cross-boundary issues.
- Improving resilience of the distribution and transmission network.

Striking a balance

It was also argued that Policy 19 lacks detail on how the planning system should support renewable energy development or the implications of such an approach where a range of planning considerations need to be balanced. Some respondents considered that, in the absence of a development management test that recognises the status of the climate emergency and the national importance of renewable energy developments, much of the approach will be 'business as usual', while others argued that Policy 19 could potentially represent a backward step when compared to the current national policy framework. Various changes to the policy were requested, including inclusion of a presumption in favour of granting consent for onshore wind farms outside National Parks and NSAs, and clarification that Policy 19 should take precedence over other NPF4 policies.

Specific text setting out that the climate emergency and emissions targets will be given great weight in deciding development proposals was also proposed. It was suggested that this should make clear that consent for development should be granted, unless any adverse impacts of the development would significantly and demonstrably outweigh the benefits. It should also state that where other policies advise on particular topics or areas of recognised importance, these must be given weight in decision-making, but the test of acceptability for a development should be as set out in Policy 19.

An alternative perspective was that the wording used in Policy 19 is overly permissive and should be more heavily caveated. Respondents argued that increasing renewable energy generation should not come at a cost to landscape or biodiversity, or expressed a view that elements within the policy may have detrimental impacts on the aim of addressing the nature crisis. It was also argued that wider aims and objectives including sustainable tourism and access to the countryside should be taken into consideration. Negative impacts on some rural and island communities were also highlighted, and it was argued that the level of offshore capacity means that the need for onshore wind farms is substantially reduced.

It was suggested that the planning system should play a proactive role in the siting and mitigation of renewable energy developments. Some respondents argued in favour of a plan-led approach that recognises constraints on development, with a call for the current SPP requirement to produce spatial locational guidance at local authority level to be reinstated. There was disappointment that the current Spatial Framework for Wind has not been carried through into NPF4 as it provides a nationally-consistent framework and a strategic steer in terms of the environmental/ social considerations that must be taken in account.

There was also a call for a national energy plan, including a sectoral plan for onshore wind, showing how each energy component needs to be delivered, including contributions to be made by each type of generation. A national assessment of where renewable energy schemes can be installed with minimal environmental damage was also proposed, with a suggestion that this could feed into Regional Spatial Strategies and Regional Land Use Frameworks.

a) An area's full potential for electricity and heat from renewable sources is achieved

Some respondents welcomed the principle set out in 19(a), although noting there is no steer to ensure the adoption of consistent approaches across LDPs or on the role of Regional Spatial Strategies.

Others, including some 'Local authority' respondents, raised a range of practical issues with the text as drafted including that:

- Ensuring that an area's full potential for electricity and heat from renewable sources is achieved, is outwith the control of the local authority. While the LDP can provide support it will be up to others to deliver.
- Policy 19(a) appears to remove the Spatial Framework for Wind Energy as part of the development plan. This is a major change that will require further guidance. It was argued that the spatial plan for Areas Suitable for Wind from the SPP should be retained.
- The policy seems to require authorities to produce a capacity study for an area, or a spatial framework for all types of green energy but does not provide appropriate guidance. NPF4 should provide a clear statement on whether development of spatial frameworks at a local level is expected.
- It is not clear whether 'area' refers to a local authority area and that this is likely to be a cross boundary issue. The role of the Regional Spatial Strategies will be important, as will collaboration with non-City Region authorities.
- Definition of 'full potential' is required. If this refers only to the generation of renewables, rather than the utilisation of them, this should be clarified. Physical potential and feasible, deliverable potential may be different.
- A definition for 'repowering' would be helpful.
- As drafted, Policy 19 appears to support all development of renewables, irrespective of impacts and should be caveated by the need to recognise

environmental and technical constraints. 'In principle' should be added to the end of the last sentence.

There were also comments with reference to landscape capacity, including that the most obvious and suitable sites have already been developed, and it was argued that the level of development pressure on some communities should be recognised. Other respondents sought guidance on the role of landscape sensitivity studies in the decision-making process and the weight that should be given to them. Views on the use of landscape capacity and sensitivity studies were also expressed, including that these are often outdated and should not form part of the LDP. It was argued these studies are subjective, and are being inappropriately interpreted as the most significant determinants of acceptability.

Respondents also highlighted a range of issues they felt should also be covered at 19(a) or in LDPs including that:

- Additional text should be included which acknowledges that renewable energy projects need to be located where they can connect to the grid.
- For consistency with the infrastructure first approach set out in Policy 8, 19(a) should incorporate a preferential planning hierarchy which prioritises: 1) repowering existing wind farms; 2) extending them; and 3) support for energy development clusters, before new development on greenfield sites.
- Community wellbeing and community wealth must be considered and that the text as drafted has no caveat that achieving an area's full potential must benefit the local community.
- There should be reference to ensuring that an area's full potential for the local use of electricity generated, for example through district heating systems, micro-grids and similar networks or technology, is achieved.
- LDPs should identify a range of opportunities for renewable energy development, without also seeking to define the environmental capacity for development, beyond reference to existing statutory designations.
- LDPs should identify areas where renewable energy potential can be realised, whilst at the same time identifying areas for safeguarding nature's recovery. They should identify, map and then safeguard areas for peatland restoration, with a strong presumption against any new energy development in these areas.

b) All forms of renewable energy and low-carbon fuels, together with enabling works should be supported in principle

Points raised with respect to Policy 19(b) included concerns that the wording is overly permissive and requires more meaningful caveats, and that there is no reference to the protection of local natural and landscape designations. Some respondents proposed that the criteria set out in 19(k) should be cross referenced at 19(b). However, it was also suggested that clarity is needed as to how 'in principle' support at 19(b) is compatible with the requirement for >50MW renewables development set out in national development 12 (Strategic renewable

energy generation and transmission infrastructure) or how these considerations should be weighed in decision-making. It was argued that ‘and given significant weight in the planning balance’ should be added at the end of 19(b).

Other respondents sought a definition of ‘renewable energy and low carbon fuels’, often associated with a position that there should be a planning presumption against new medium-sized and large-scale wood burning plants. It was also argued that low-carbon hydrogen and gas used with CCUS should be considered as low-carbon fuels, and that 19(b) should recognise them as such. A specific reference to hydrogen and associated pipelines was suggested.

Other points relating to infrastructure included that network capacity constraints must be resolved to allow the electricity network infrastructure to support renewables developments, and that there should be support for infrastructure beyond the relatively narrow definitions of ‘transmission and distribution infrastructure and energy storage’. Clarification that support extends to onshore infrastructure which is required to support offshore renewables was also requested.

c) Development proposals for wind farms in National Parks and National Scenic Areas should not be supported

Although some respondents welcomed Policy 19(c), it was also argued that the principle of the ‘right turbine in the right place’ should continue and that the policy should not be seen as an automatic acceptance of windfarms in other areas. It was noted that NSAs were not intended as the totality of areas of high-quality landscape in Scotland.

There were calls for similar principles to be applied to:

- Designated WLAs.
- Peatland.
- SSSIs.
- MPAs.
- Regional Scenic Areas.
- The UNESCO Biosphere.
- World Heritage Sites.
- Areas of high scenic value that attract high volumes of visitors, where such footfall supports remote communities.
- Other types of renewable energy developments.

Consideration of adjacent areas that impact views into, or out of, National Parks and NSAs was also suggested.

Another perspective was that the absence of wind energy development in National Parks seems at odds with the aim for Parks to be carbon neutral if they do so using renewable power generated elsewhere, and that this restriction could prevent large areas of the country from generating renewable energy, despite being well placed to do so. It was also observed that the protection of National Parks and NSAs

means more energy is required from the remaining areas, and it was suggested a balance is needed with other rural land uses, including food production.

d) Outwith National Parks and National Scenic Areas development proposals for new wind farms should be supported unless the impacts identified are unacceptable

With respect to Policies 19(d) and (e), respondents argued that a definition or test of what constitute 'unacceptable' impacts is needed, including because the effect of onshore wind on landscape is a subjective issue.

Some respondents, predominantly from the 'Energy-related supplier, developer, association or body' group, saw the emphasis on acceptability as unhelpful, replicating current practice, or failing to capture the urgent need to accelerate the development of renewable energy projects. It was also suggested that, as drafted, the text is less supportive than the current Onshore Wind Spatial Framework, which states that wind energy schemes in Group 3 areas 'are likely to be acceptable'. Several amendments to the wording were proposed including:

- Changing 'supported' to 'afforded additional weight'.
- Referring to 'significant adverse impacts'.
- Adding that development proposals 'will be supported unless any adverse impacts of what is proposed would significantly and demonstrably outweigh the need for and benefits of the development...'
- Replacing 'unacceptable' with 'overwhelming or overbearing'.

Replacement text was also suggested – both the development management test referenced under 'Striking a balance', or a statement that outwith National Parks and NSAs, development proposals for new wind farms should be supported unless the Landscape and Visual effects identified (including cumulative effects) substantially reduce the ability to appreciate and experience the special qualities of the landscape, and are not outweighed by the need for and benefits of what is proposed.

Other respondents argued that Policy 19(d) is contrary to the spirit of NPF4 and a plan-led system or that a spatial approach to location of onshore wind developments should be retained. While the protection afforded to National Parks and NSAs was welcomed, it was suggested that the meaning of 'recognising the sensitivity of other national and international designations' is unclear, and it was suggested that protection should be extended to include other areas or designations including:

- WLAs.
- Peatlands.
- The UNESCO Biosphere.
- Local heritage assets.

Points made with respect to impact assessments included that the text may put too much emphasis on EIAs and Landscape and Visual Impact Assessments (LVIAs). Use of Landscape Character Assessments, Habitats Regulations Appraisals, Residential Impact Assessments, and Noise Assessments were also suggested.

e) Proposals to repower, extend and expand existing wind farms and for the extension of life to existing windfarms

Although there was support for Policy 19(e) it was also argued, as at 19(d), that the addition of a caveat around 'unacceptable' impacts is not helpful, and that there should be stronger support for repowering proposals. Some respondents suggested amendments, including that there should be support for, or a presumption in favour of granting permission to repower:

- 'Unless any adverse effects significantly and demonstrably outweigh the benefits'.
- 'Unless the effects identified (including cumulative effects) compared to the existing baseline (including the project to be repowered, expanded or life extended) are substantially increased'.

It was also suggested that additional weight should be given to the existence of operational renewable energy sources and extant consents for a wind farm on the same or neighbouring land, and that the presence of existing operational turbines will be an important material consideration. Including the 'extension' of projects by the post-construction addition of electrolytic hydrogen production and associated storage and pipelines, as well as battery storage options was also proposed. Encouragement of the use of low carbon materials, or the retention of existing materials by requiring developers to justify any decision not to reuse existing infrastructure, equipment and materials was suggested.

An alternative perspective was that applications should still be subject to full planning scrutiny, including as an opportunity for developers to re-engage with local communities. Opportunities for more direct community benefit to be built in to plans to repower or extend the life of existing windfarms were also suggested. It was noted that proposals under 19(e) might be significantly different from what already exists, and that other developments may have taken place which would impact on the considerations of such proposals. Respondents highlighted the implications of larger wind turbines for both the amenity of residents and for tourism, including impacts at the boundaries of National Parks. It was suggested that the policy should reference the capacity of the landscape and its potential to accommodate additional development.

Clarity with respect to terminology was requested, including what is meant by 'extend and expand', and with a suggestion that definitions should reflect the Onshore Wind Policy Statement. The methodology that a planning authority should use to determine whether impacts are unacceptable was also queried, and the absence of any reference to the role of spatial strategies or to the assessment of cross boundary developments was highlighted.

f) Small scale renewable energy generation technology

Comments on small scale energy generation included a suggestion that there is a significant opportunity to integrate green energy production with repopulation and rural development, and that explicit support for the local production and consumption of energy and micro-grid development would be welcome. It was also suggested small scale generation should be considered in conjunction with Policy 11 (Heating and cooling) and in the context of the Local Energy Policy Statement.

However, it was argued that even small scale technologies can have significant impacts and that any support should be 'in principle', 'where appropriate' or 'unless the impacts identified are unacceptable'. Respondents proposed both that the specific considerations outlined in Policy 19(k) should apply and that any non-compliance with planning conditions should be enforced.

Other issues raised included:

- That 'small scale' needs to be defined.
- That consideration of noise is important, particularly where there is permitted development.

It was also argued that this section should be removed as the support for renewable energy generation technology of all sizes is included in sections 19(a) and 19(b).

g) Suitability for use in perpetuity

Some respondents welcomed the concept of use in perpetuity, which was suggested to be in line with consent for other critical infrastructure. It was also argued that it provides an incentive for developers to invest in local skills and infrastructure, and an opportunity to develop hub locations for the repair, reuse and reprocessing of wind turbines and parts. There were also requests to:

- Provide clear direction to consenting authorities that it is appropriate to grant consents in perpetuity if this is sought in an application.
- Clarify what might be an 'acceptable level of amenity for adjacent communities'.
- Improve and streamline the process for determination of applications under Section 36 of the Electricity Act 1989.

Points were raised regarding what was seen as a potential contradiction in issuing time limited consent if the site may be used in perpetuity. Clarity was requested that the policy does not say that wind farms granted permission on these sites have automatic rights in perpetuity, but are still subject to time-limiting consents and must reapply for extensions or repowering applications.

Some respondents commented on the difficulty of foreseeing future advances in technology, or that future expectation of amenity can change along with technology. Associated suggestions included that:

- As an alternative to consents in perpetuity, there could be a minimum committed time scale, with priority to extend beyond this if it is still of value to: (a) the community and (b) local and national energy needs.
- The policy should be amended to allow re-assessment once a consent has expired.

Clarity was also requested with respect to whether the policy refers to consented sites or areas identified in a spatial framework and whether consent in perpetuity is legally enforceable.

h) Decarbonisation strategies

Many of the comments on 19(h) came from 'Local authority' respondents with requests for:

- Explanation of what is meant by 'appropriately abated'.
- Guidance on the method for preparing strategies, the criteria to be used to demonstrate compliance, and on monitoring.
- An indication of how such strategies should be assessed. It was argued that local authorities do not currently have 'in house' expertise and competency to do this, and that there will be resource implications for training or outsourcing.

It was also suggested that the policy appears to exclude applications for energy generation from fossil fuels, and that it should apply to all major applications for energy generation whether low-carbon or not. Although some respondents queried why applications for energy generation from low carbon sources should need a decarbonisation strategy, there was a view that the policy should explicitly include wind farms and solar arrays, which involve carbon costs in manufacturing, transport, groundworks and sometimes soil disturbance.

Other points on 19(h) included that it is unclear if this is referring to energy generation which is part of a manufacturing or industrial development, or if it is referring to energy generation as well as manufacturing or industrial developments, or that clarity is required to confirm what exactly is meant by a 'major application'.

i) Negative emissions technologies and carbon capture

Several respondents expressed concerns in relation to 19(i), highlighting the costs of developing CCS/CCUS technologies, their unproven nature, concerns around residual emissions, and the possibility they may never be implemented sustainably. It was also argued that negative emissions technology should not be used as a justification for the continued operation of high carbon activities, and that renewable technologies should be exhausted before opting for negative emissions technologies and carbon capture.

With respect to specific technologies, it was suggested that:

- Bioenergy with carbon capture and storage should not be viewed as a 'negative emissions' technology since burning wood for energy is not carbon neutral.

- CCS coupled with blue hydrogen can only be a transitional strategy because the process is not zero carbon. Furthermore, blue hydrogen production is reliant on infrastructures that do not currently exist.

There was also a view that CCS is not suitable for EfW incineration plants, given their small scale and dispersed locations. However, an alternative perspective was that EfW has a key role to play in supplying low carbon energy and that this section should link to Policy 20 (Zero waste) to ensure that local authorities and LDPs attach equal weight to Policy 19 when planning for and determining relevant waste management planning applications.

Other respondents suggested that a definition of ‘emissions technologies’, and criteria on how proposals are to be assessed, are both required.

Revisions to the text were also suggested, including a caveat ‘unless the impacts identified (including cumulative effects) are unacceptable’, and addition of support for both ‘transport and storage’.

j) Solar arrays

General comments on Policy 19(j) included a query whether the considerations listed are intended to be additional to those in 19(k) and a suggestion that the policy requires both a definition of ‘adversely affect’ and guidance on how compliance should be demonstrated. It was suggested that LVIA’s may help in this respect.

Some respondents suggested that 19(j) as drafted sets the bar very high and could mean even minor adverse impacts lead to refusal of consent for solar arrays. It was argued the text should be amended to make it clear that support for solar developments will only be set aside if adverse impacts clearly and demonstrably outweigh the benefits, or that planning authorities should be satisfied that these would not ‘significantly’ adversely affect the factors listed. It was also suggested the policy should acknowledge the importance of, and give greater weight to, renewable technologies such as solar, which are available to deploy now.

Other comments on 19(j) included that it is too detailed and specific for NPF4, and that no other technologies have been singled out in this way. Specifically, it was argued that the detail regarding the mounting system for a solar generator should be deleted, as should references to glint and glare studies. Removal of the reference to historical assets was also suggested, since almost all solar arrays will have some adverse impacts on historic environment assets and a proportionate response is needed to avoid and minimise adverse impacts as much as possible.

However, the most frequently-made point on 19(j) was that the wording should be strengthened to ensure solar arrays do not adversely affect protected species and habitats. Other suggestions for addition to the list of factors to be considered included:

- Prime agricultural land, and that solar arrays may not always represent the best use of land to meet wider climate objectives.
- ‘Landscape/visual interests’, including in areas of National Parks, where there could be a significant impact from solar arrays.

It was also proposed that 19(j) should be extended to provide locational guidance relating to roof-mounted solar panels and to reference an agreed decommissioning process, in the light of concerns regarding pollution arising from decommissioned solar arrays.

k) Specific considerations

It was noted that the list of considerations at 19(k) essentially replicate those within current SPP paragraph 169. Many suggestions were made with respect to the prominence or wording of individual considerations or for further considerations to be added. In general terms it was suggested that:

- It should be made clear that considerations listed at 19(k) apply to all parts of Policy 19, or that it would be helpful to move this information to 19(b). Considerations should be cross referenced to relevant parts of Policy 19.
- It would be helpful to incorporate spatial infrastructure plans and locational guidance to support these considerations, to avoid creating unnecessary tension between nature, heritage and renewable energy developments.
- The process of applications and scoping would be sped up by introducing more quantitative parameters for the considerations listed.
- Taking these considerations 'into account' is not sufficient or consistent with Policy 3 (Nature crisis).
- The introductory statement should explicitly state that 'development proposals for renewable energy developments must take into account and ensure no unacceptable impacts in relation to' thereby aligning with the wording of 19(d).
- 19 (k) reiterates existing constraints, will place an excessive burden on small-to medium-sized projects, or will maintain the status quo, giving local authorities a vast list of reasons to reject renewables projects.
- Decision makers will require guidance in balancing these considerations against other NPF4 policies (particularly Policies 2, 6, 28 and 32).

Policy 20: Zero waste

We want our places to be more resource efficient, and supported by services and facilities that help to achieve a circular economy.

Question 41 – Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

Around 235 respondents commented at Question 41. In terms of an overall balance of opinion, respondents tended to support the policy, although often with calls for greater clarity.

General comments included calls to strengthen the language used in Policy 20, for example using 'must' rather than 'should' or removing 'aim to'. Other points raised included that:

- Implementation and delivery will rely heavily on other plans and initiatives and some aspects appear more applicable to building control. The societal behaviour change needed was also suggested to be a task beyond the planning system.
- Planners are likely to need guidance and training in application of the policy. Planning services will need to be properly resourced and guidance, or examples, would help consistent decision-making.
- It would be helpful to set out how compliance is to be demonstrated.
- It is unclear how Policy 20 relates to other NPF4 policies, for example in relation to promoting the use of brownfield sites.
- Particular challenges in achieving policy objectives in remote rural and island areas should be acknowledged.
- Given the potential cross boundary nature of the proposals, adjoining local authorities should work together where appropriate.

Respondents also highlighted issues they felt should be included or should have a greater focus in Policy 20, most frequently referencing the need for stronger support for developing a circular economy. It was argued that, as drafted, the policy focuses largely on waste management, but should reflect wider issues including the reuse of materials and avoiding the creation of waste and shortening supply chains. Reuse of existing buildings was highlighted as an important element of the circular economy that currently has limited coverage. Suggestions included that it might be preferable to draft a circular economy policy, with zero waste as a component part, or that a standalone circular economy policy would allow many other aspects to be explored more fully.

Other topics that respondents suggested should be covered in Policy 20 included:

- Food and agricultural waste.
- Reducing soil waste and promoting the reuse of soils.
- Fly tipping and litter.
- The recycling of turbine blades.

a) LDPs should identify appropriate locations for new infrastructure to support the circular economy

There was support for 20(a), although also a view that cross-sector and cross-agency working will be crucial, and that the Scottish Government will have a key role in co-ordination and leadership. Taking a strategic approach through Regional Spatial Strategies also recommended.

It was noted that designating locations through LDPs does not necessarily result in the development of facilities, as developers are still required to bring forward proposals and that investment support may be needed.

With respect to what constitutes an appropriate location, it was suggested that:

- Research will be needed to identify what infrastructure is required and both resources and guidance will be needed.
- Waste management facilities should be as close to the community using them as practicable.
- An assessment of the carbon impacts of transporting waste material should be carried out and that plans should not be approved if overall carbon impacts increase as a result of the development.
- Communities should have a voice in decision-making.

It was also suggested that 20(a) should be substantially reworded or should be combined with section (f).

Whether planning authorities are required to identify EfW sites for the LDP was queried.

b) Development proposals should aim to reduce, reuse, or recycle materials in line with the waste hierarchy

There was a request for greater clarity and guidance on how the requirements of 20(b) are to be demonstrated, including what evidence is required and how this is to be assessed. Specific points included that:

- It will be important to ensure that reuse is appropriate, either in the policy or supporting guidance.
- Embodied emissions are very difficult to calculate, and planning authorities will not have the resources to do this.
- If the waste hierarchy and the lowest embodied emissions choice for materials diverge, the lower embodied emissions option should be preferred.
- NPF may not provide the best mechanism for regulating embodied carbon in detail, but it is useful to set the direction of travel and to create an expectation that developers should seek to understand, and minimise, embodied carbon.

A number of respondents, including from the 'Development, Property or Land Management Company or Representative Body' group requested guidance on the use of materials with the lowest forms of embodied emissions and the level of detail that will be requested at planning application stage. It was suggested that lack of clarity risks causing delay and uncertainty to the planning system.

There was also an argument that failure to consider the impact of emissions both in use and at end of life, risks a project or development increasing overall emissions.

With respect to construction and demolition methods, it was suggested that greater clarity about the requirements on developers would be beneficial. The policy was seen as an opportunity to advocate deconstruction approaches.

Other points raised on Policy 20(b) included that:

- Current regulations prohibit the reuse of some construction materials.

- A lack of waste recycling infrastructure in Scotland, particularly in relation to metals, can result in wastes being shipped overseas for processing, resulting in higher emissions as well as loss of economic value.
- It is not clear that developments that fulfil the criteria listed, will actually have any further weight in the planning balance.

It was also suggested sections (b) and (c) could be combined.

c) Development proposals within the categories of national and major developments should take into account circular economy principles

As noted above, there was a view that circular economy principles should be applied more widely, rather than being restricted to national and major developments. Use of the phrase 'where appropriate' was also thought to weaken the requirement or to make enforcement more challenging for local planning authorities. There were also concerns that:

- As drafted the policy could encourage applicants to submit multiple local scale developments instead of a single major planning application.
- 20(c) could be read as suggesting that planning authorities are expected to monitor how a development handles its waste for the life of the development, and that clarification on monitoring the performance of the circular economy is needed.

There were requests for:

- Substantial guidance on how developments should take circular economy principles into account.
- More direction on the material requirements of all national development projects, particularly those which are material intensive, such as construction, energy transition and manufacturing.

An additional bullet to reference circular economy principles with respect to soils was suggested.

The requirement to reuse existing buildings and infrastructure was welcomed, although there was also a suggestion that the policy should highlight more of the positive carbon capture that can be achieved by retaining historic assets, and that there should be explicit support for repurposing and reusing existing buildings. It was also noted that in most circumstances there is nothing to stop demolition prior to application.

In terms of how to incentivise reuse, it was suggested that strong countryside policies which restrict development to the reuse of existing buildings of note could provide a tool, or that the Scottish Government's mechanism for material costs could be changed, so virgin materials have a higher tax. However, there was also a query as to how the planning system can enforce the reuse of materials. It was also argued that it may not be possible to remediate some buildings to a suitable performance level, and that there may be cases where demolition and replacement is the best option for the whole life costs of a development.

Clarity was sought with respect to what is meant by 'adaptability and flexibility'.

d) Development proposals that are likely to generate waste when operational, should include provision to maximise waste reduction and waste separation

Points with respect to 20(d) included that terms such as 'maximise' and 'minimise' are too broad, and that the policy should clarify both the requirements and how they are to be measured. It was suggested that development proposals should not only be required to comply with current regulatory requirements, but also include future proofing of storage and collection arrangements, allowing for the potential for further requirements regarding segregation of waste. It was also argued that:

- Residential development proposals should be 'supported by' appropriate recycling and localised waste management facilities rather than including 'provision for', which was seen as indicating that an on-site solution is required.
- 'Extractive waste' (materials which are disturbed and handled in the course of quarrying) should be distinguished.

e) Development proposals for waste infrastructure and facilities

General comments on 20(e) included the importance of adopting an infrastructure first approach to development of waste infrastructure and facilities, taking account of existing infrastructure. Why landfill and EfW plants should be excluded was also queried.

While the inclusion of consideration of environmental impacts on the historic environment under 20(e) was welcomed, it was suggested that the policy should also apply to both built and natural environments, and that impacts on tourist assets should be included. An additional criterion relating to impacts of transport to the site on the local area was also proposed.

Other points included that clarification is needed with respect to:

- Who will set and monitor acceptable limits for environmental impacts relating to noise, dust, smells etc.
- What is an 'acceptable level' or an 'adequate' buffer zone. It was suggested that the provisions relating to buffer zones set out in SPP paragraph 191 should be retained.

The importance of applying buffer zones to new developments that are proposed close to existing waste management facilities was also highlighted, with a suggestion that development such as housing should be prevented from encroaching within 200 metres of existing facilities or allocated waste sites.

Guidance was sought with respect to assessing offset emissions.

f) Development proposals for new waste infrastructure

Although the provisions of 20(f) were supported, it was also suggested that: criteria set out at (e) should also apply at (f); Policies 20(e) and (f) should be combined; or that Policies (a) and (f) should be combined.

It was reported that local authorities often allocate industrial/employment land within LDPs as suitable for waste management development, rather than making specific land allocations (or criteria) for such development. It was recommended that LDPs should make specific provision for waste management development within industrial and employment land. An alternative view was that allocating waste infrastructure to the classes listed, encourages bad neighbour development in locations that may already be experiencing environmental problems, and that waste should be managed as close to source as possible.

Other points or requests for clarification included that:

- LDPs may wish to identify which business and industrial areas are suitable for waste use and which are not.
- Waste infrastructure may not be an acceptable use in strategic economic locations, and that it is unlikely that major waste infrastructure developments could be accommodated in traditional urban industrial locations.
- Support for development should be subject to a needs and demand assessment for industrial/business/storage uses.

g) Development proposals for new or extended landfill sites

It was noted that the Scottish Government's current waste targets are for 2025 and that it is important NPF4 considers the future policy direction beyond this date to determine capacity requirements. A requirement for accurate and useable capacity provision and need data was also highlighted.

Whether there should be support for new landfill sites under any circumstances, and how his approach aligns with the Scottish Government's goal to stop landfill by 2030 were both queried. Criteria for new developments similar to those set out in Policy 19(k) were also suggested, or that there should be a general requirement for new or extended landfills to comply with other relevant policy, including providing biodiversity enhancement.

h) Proposals for the capture, distribution or use of gases captured from landfill sites or waste water treatment plant should be supported

Comments on 20(h) included that capture of gas from landfill should be mandatory, not just supported, and it was questioned whether there should be caveats, similar to those in 20(i). It was also noted that, since the landfill of biodegradable municipal waste will be banned from 2025, the amount of landfill gas produced will be increasingly limited.

i) Development proposals which involve the recovery of energy from waste

Some respondents welcomed the independent review of the role of incineration in the waste hierarchy in Scotland, while others argued that incineration is not acceptable in any context, with negative impacts on emissions targets, recycling targets and public health all cited. However, it was also suggested that the use of waste material to generate energy for both electricity and local heating should be more actively supported and encouraged.

With respect to the provisions of 20(i) it was suggested that it is not clear whether the first bullet point means a site allocated as a specific proposal, or just where it would be in broad compliance with LDP policies. There was a view that it will be hard to identify sites in the absence of specific proposals because the environmental assessment will be too difficult, and the costs of doing so may not be proportionate. Specific suggestions included that this bullet should be amended to reflect the proximity principle, or to allow EfW facilities within established areas for planning use classes 4, 5 or 6, rather than having to be subject to an allocation within a LDP.

Other comments on 20(i) included that:

- The absence of combined heat and power networks for operating incinerators suggests stricter measures are required. It was argued that these should include agreements with heat network partners for the development of heat networks at the time planning consent is given.
- The effectiveness of heat and power plans will depend on whether planning officers have appropriate technical knowledge to assess them.
- There is no guidance on how decarbonisation strategies should be prepared, or what the criteria for judging a strategy would be.
- The requirement for new EfW plants to consider CCS is welcome, but also that it is untested for operational EfW plants in the UK. Caution around reliance on CCS to reduce the carbon emissions from EfW was advised.
- It is not clear what the community benefits referenced might be, or why they should only apply to EfW proposals.

Several respondents commented on the final sentence of Policy 20 stating that 'development proposals should not be supported if they would, either directly or indirectly, limit the operation of existing or proposed waste management facilities.' Some welcomed this provision but suggested it should be presented as 20(j). There was also a view that this could be seen as stifling innovation and competition within the sector, and that the text should be removed from the final version of the policy.

Policy 21: Aquaculture

We want to support investment in aquaculture and minimise its potential impacts on the environment.

Question 42 – Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?

Around 140 respondents made a comment at Question 42.

Most of those commenting on Policy 21 supported the focus on the sustainability of aquaculture, including the minimising of environmental impacts. However concerns were raised around achieving the balance between supporting industry and minimising environmental impacts. It was suggested that the policy is too focused on supporting investment and does not give sufficient priority to the environment. There were calls for a stronger approach to dealing with the environmental impacts associated with aquaculture, including suggestions that Policy 21 should:

- Require the aquaculture industry to further explore less harmful farming techniques, to improve sustainability and welfare standards.
- Be extended to consider those environmental impacts associated with accessing aquaculture infrastructure.

Others suggested that the policy could be more supportive of growth in the aquaculture industry, with some of the view that the potential negative impacts associated with aquaculture development are over-stated, and not supported by the available evidence. The economic benefits for local communities associated with aquaculture were also referenced. Respondents also noted that aquaculture planning applications are often for the rationalisation and improvement of existing fish farms and wished to see the planning system support these improvements.

Widening the scope of the policy to include a range of aquaculture activity such as seaweed farming, multi-trophic aquaculture, microalgae culture and recirculating aquaculture systems was proposed. Respondents pointed to the potential for new aquaculture activities to develop and wanted to see NPF4 ensure that these will be supported by the planning system. This included calls for encouragement for research, development and innovation in the sector.

Some respondents referred to the recent review of aquaculture regulations and wished to see this taken into account. Respondents were also looking for alignment with the Scottish Vision for Aquaculture currently in development. There was a concern that there is no reference to the SPP requirement that planning regulation and guidance should avoid duplication of legislation relating to aquaculture, and it was also noted that the number of regulators with responsibility across different parts of the aquaculture industry can lead to uncertainty for stakeholders. There was a call for Policy 21 to clarify where different agencies' responsibilities lie.

a) LDPs should guide new aquaculture development to locations that reflect industry needs and take account of environmental impact

Many of those commenting on 21(a) supported the reference to aquaculture development being sensitive to environmental impacts, including cumulative impacts. While some comments highlighted the potential for aquaculture development to be delivered without impacting biodiversity, others noted that aquaculture development has the potential for significant negative environmental impacts. There were suggestions that optimal locations for aquaculture are rarely the most sustainable sites due to potential impacts on landscape and visual interest, the environment, and other marine users. Minimising these impacts was seen as a priority.

Some also disagreed with the balance between industry and the environment, expressing concern that the 21(a) draws on the now outdated National Marine Plan, which was said to be in need of updating. Many of those commenting felt that the policy appears to place a greater emphasis on industry 'needs' and presents environment impacts as a secondary consideration. For example, it was noted that the introductory text to 21(a) refers to locations that reflect industry needs without any reference to environmental impacts. There was also a view that the reference to aquaculture development 'taking account' of environmental impacts does not reflect the urgency of response required by the climate and biodiversity crisis. Respondents also suggested that this approach is not consistent with other parts of NPF4 which identify climate change and biodiversity as key considerations, nor with the current Ministerial Review of aquaculture regulation, which aims to deliver a sector which is environmentally and economically sustainable.

In addition to the balance between industry need and environmental impact, some respondents also raised concerns around the approach to spatial planning set out. These respondents highlighted the complexity of spatial planning for aquaculture development and suggested that it is not feasible for LDPs to direct development as suggested. In part, this reflected concerns that some planning authorities are unlikely to have the specialist knowledge, technical expertise and capacity to support effective spatial planning for aquaculture. However, it was also suggested that the complexity of environmental and economic criteria involved, and the dynamic nature of marine and coastal environments, mean that longer-term spatial planning is not appropriate for the sector. It was noted that this is reflected in the approach taken by planning authorities to date, which has primarily been based on criteria-based policies.

Some suggested that 21(a) should be reframed to ensure that new aquaculture development minimises environmental capacity and biodiversity impacts, including the cumulative impacts of existing fish farms and other marine activities. There were calls for a clear statement that environmental objectives should be prioritised over economic considerations, and for reference to the need to secure a 'thriving environmentally and economically sustainable aquaculture sector'. There was also thought to be a need for further guidance on the spatial planning approach for aquaculture, recognising the complexity involved.

Respondents also raised concerns around the assessment of environmental impact, including the reference to taking account of the environmental impact of other existing and planned aquaculture developments. These concerns reflected a view that impact assessment for aquaculture is highly complex. Respondents made specific reference to a need for guidance on the assessment of environmental impact, including the range of impacts to be considered, the evidence that should be included with proposals, what are considered to be acceptable environmental impacts, and what action should be taken where impacts are not acceptable.

Other amendments suggested included:

- The SPP reference to LDPs making positive provision for aquaculture development should be included in NPF4.
- Reference should be made to the role of National and Regional Marine Plans in informing LDPs in relation to the location of aquaculture development.
- Full EIA, undertaken by a reputable marine research institute, should be required for aquaculture development proposals.
- ‘Planned aquaculture development’ should be defined to clarify at which point in the planning process other development should be taken into account.

Scotland’s Marine Assessment 2020 was cited as evidence that there are insufficient ecosystem monitoring sites, and it was suggested that this must be resolved before further aquaculture development is supported to ensure environmental impacts can be properly assessed and minimised.

It was also noted that aquaculture is a key link between terrestrial and marine planning, with some suggesting that NPF4 could do more to recognise this. These respondents suggested that, as a minimum, 21(a) should highlight links with Policy 35 (Coasts).

b) Further salmon and trout open pen fish farm development on the north and east coasts should not be supported

Many of those commenting were in favour of action to limit open pen fish farming to protect migratory fish species. These respondents cited evidence on the range of environmental and ecological impacts associated with open pen fish farming, including concern that the environmental carrying capacity of marine environments is already being exceeded. In addition to impacts on migratory fish species, there was reference to negative impacts on the seabed, marine pollution, and impacts on other fish and marine mammal species. Respondents also highlighted the economic impacts of harm caused to migratory fish species, given the role of wild salmonid populations for the viability of fishing industries.

There were also calls for 21(b) to be expanded to protect migratory fish species in other parts of Scotland – primarily the west coast. Respondents noted that the west coast accounts for the majority of fish farm development and is already seeing significant pressure on wild salmonid populations. It was also suggested that prohibiting open pen farming on the north and east coasts could increase pressure on the west coast for aquaculture development. There were calls for further

evidence on the reasons for limiting 21(b) to north and east coasts, and for a detailed SEA to be conducted before any further fish farm development is considered on Scotland's west coast.

Other issues and suggested amendments included that:

- SEPA must be given responsibility for managing risk to sea trout, as part of the risk-based tool to manage risk to wild salmonids.
- Future priorities for marine planning could change if closed pen aquaculture approaches prove commercially viable on the north and east coasts.

c) Aquaculture development proposals should be supported where they comply with the LDP, National and Regional Marine Plans

Comments at 21(c) included support for the role of the National and Regional Marine Plans as part of the decision-making framework for aquaculture development, although it was noted that the latter are still under development. In advance of Marine Plans being put in place, some wished to see planning authorities engage with bodies likely to be involved in Marine Planning Partnerships in order to aid interpretation of policy and ensure consistency of decision-making.

However, some raised concerns around the adequacy of the plans cited to protect wild fish populations. It was reported that a review of the National Marine Plan is overdue, that Regional Marine Plans are not currently in place, and that LDPs may be up to 10-years old. Some wished to see reference to the role of Local Place Plans in relation to aquaculture development.

Reflecting comments at 21(a), some suggested that the phrasing of 21(c) is too focused on industry growth, rather than ensuring environmental sustainability. These respondents wished to see it clearly set out when aquaculture development proposals should not be supported, including reference to other policy and regulation that should inform planning decisions on aquaculture development. Specific reference was made to Marine Protection Areas (including calls for aquaculture development to be prohibited in these areas), SEPA's Aquaculture Sector Plan, the Scottish Government's Aquaculture Vision, the review of aquaculture regulation, the Future Fisheries Management Strategy, and the Blue Economy Action Plan. Reference was also made to the role of the Statutory Harbour Authority and Maritime and Coastguard Agency in relation to aquaculture.

d) Fish farm proposals should demonstrate that operational impacts comply with the regulatory framework

Some respondents expressed support for the control of operational impacts at 21(d), including management of cumulative impacts. Some of these respondents referred to their experience that planning decisions often fail to give proper regard to these wider impacts. In this context, it was suggested that 21(d) should be expanded to include shellfish and seaweed farming proposals.

Others felt that 21(d) does not set sufficiently robust standards for aquaculture development proposals to support the health of Scotland's coasts and wild

salmonids. There was reference to terms such as ‘acceptable’ and ‘appropriately’ as being open to interpretation and there were calls for NPF4 to be more explicit about how these terms should be applied to planning decisions.

Respondents also suggested that 21(d) should focus on considerations not covered by other regulatory regimes, including through specific reference to visual amenity and the potential conflict with other users of marine and coastal environments.

In relation to the planning and regulatory framework for aquaculture development, some noted that the reference to regulatory compliance is not consistent with the SPP statement that planning should not duplicate other legislation. However, others wished to see NPF4 implement tighter monitoring, regulation and enforcement of environmental standards, including specific reference to the Salmon Interactions Working Group recommending a risk-based approach to planning for aquaculture development. Further detail was also sought on why finfish and shellfish developments are exempted from the requirement at Policy 3 (Nature crisis) to demonstrate the conservation and enhancement of biodiversity.

Other comments focused specifically on operational impacts, and the siting and design of aquaculture development. In relation to the NPF4 requirement that operational impacts should be acceptable and comply with the regulatory framework, the following points were made:

- There was thought to be need for better evidence on the operational impacts of aquaculture, including cumulative impacts. Respondents highlighted a range of potential operational impacts, including some that are not specifically referenced at present. These included impacts associated with dissolved nutrients, sea lice, pesticide discharges, predator control and interaction with other species, impact on wild salmonids, seabird entanglement, impacts on other coastal and marine users, impacts on local communities and natural heritage, and impacts on the historic environment. Some expressed particular concern around the impact of sea lice on marine environments, noting that there is currently no regulatory framework to protect wild migratory fish. Reference was also made to a need for a better understanding of the capacity of marine environments to absorb these impacts.
- Some raised concerns around how operational impacts are measured, including what was seen as an urgent need for new guidance for planning authorities on the assessment of cumulative impacts. It was reported that existing aquaculture development can degrade the marine environment, such that the impact of further development appears less significant. This ‘shifting baseline’ approach was seen as preventing ecosystem recovery.
- It was suggested that, where the risk of harm associated with aquaculture development is not well understood, the precautionary principle must be used in the determination of development proposals. It was noted that this is in line with the recommendations of the Environment, Climate Change and Land Reform and Rural Economy and Connectivity committees. There was particular concern that the presumption against new open pen farms on the north and east coasts should not be interpreted to mean that caution is not

required when considering aquaculture development proposals in other locations.

- Clarity was sought around how the acceptability of operational impacts is to be assessed.

In relation to the siting and design of cages, lines and associated facilities, the following points were made:

- Some respondents expressed their support for the control of the siting and design of cages, lines and facilities. Further comments included that that fish farms have already been sited in unsuitable locations, such as Marine Protection Areas, NSAs and adjacent to WLAs.
- Clarity was sought on what constitutes appropriate siting of cages, lines and associated facilities – and what should be considered inappropriate siting?
- It was suggested that development proposals should include decommissioning and reinstatement plans, adhering to fish farm consolidation and rationalisation policy, if existing fish farm infrastructure becomes redundant.

In relation to siting and design of land-based facilities, some noted that the different planning requirements placed on land-based facilities can mean that planning decision timelines can differ from those for marine proposals. There were calls for greater flexibility in response to this.

Policy 22: Minerals

We want to support the sustainable management of resources and to minimise the impacts of extraction of minerals on communities and the environment.

Question 43 – Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

Around 160 respondents made comment at Question 43.

Many noted their broad support for the policy approach set out, albeit they often went on to refer to particular aspects they wanted to see changed, or to additions or points of clarification for which they were looking.

General reasons given for supporting the policy included that there is a need to ensure an ongoing supply of minerals. It was suggested that without a steady and adequate supply of the essential minerals and mineral products, the delivery of housing, infrastructure, other developments and manufacturing cannot be assumed. In relation to the role of minerals, comments included that:

- Aggregates are essential for construction, while industrial minerals supply construction and manufacturing.
- The supply of minerals needs to be planned for, monitored and managed. There was a call for policy makers to make the link between development and

the materials needed to build for the long term. Connected to this was a concern that NPF4 as currently drafted does not give sufficient consideration to how the building materials required to fulfil its ambitions will be sourced.

Other comments included that the policy broadly reflects that which has been used to assess minerals development proposals to date. It was suggested, however, that it should be made clear that proposed development to which this policy applies will still have to comply with, and be assessed against, other appropriate policies in the LDP.

The intention to apply the precautionary principle to mineral extraction was welcomed, along with recognition of the need to protect biodiversity, the natural environment, sensitive habitats, the historic environment, landscape and visual impacts.

Others had broad concerns, including because there does not appear to be an assessment of the level of need for the products extracted. The lack of cross referencing to Policy 29 (Zero waste) was highlighted and there was a call for more emphasis on minimising the use of new minerals, and maximising the use of recycled materials in line with the principles of a circular economy. In connection to the circular economy, it was suggested that developers should seek to avoid the need for new materials, and that Policy 22 would be strengthened by including a requirement that proposals demonstrate their compatibility with a circular economy, or why suitable minerals are not available through a circular economy. Further, the policy should include a requirement to consider whether demand can be met through the use of secondary materials, or those already available on site, prior to the extraction of new minerals.

In terms of general points for clarification, there were queries about the range of minerals and extraction covered under the policy. Specific issues raised included that:

- References seem to be confined to aggregates and fossil fuels. An associated concern was that this could open the door to irresponsible mineral extraction.
- No reference is made to development of new mineral opportunities, other than in relation to aggregates and fossil fuels. Elsewhere, the draft NPF4 makes reference to the importance of increasing deployment of low carbon and net zero technologies. The draft does not, however, recognise the role that critical minerals will play in the production, and ultimately the rate of deployment, of these technologies and the positive impact of an indigenous supply chain on renewable energy.
- There is no explicit reference to building stone extraction, despite it being a ubiquitous traditional material. It was suggested that poor availability of indigenous traditional building materials poses a risks to the long-term health of the historic environment and should be considered in NPF4.

In terms of other aspects which the policy could address, suggestions included:

- The strategic role of Regional Spatial Strategies.

- That mineral permissions should be temporary and time limited.
- The site selection process, with a hierarchy of preferable locations, which could then be considered for introduction in the LDP. There was reference to: existing mineral sites; underlying a proposed development site, where minerals can be worked ahead of a future land use; extension of an existing operational site; re-opening of a dormant mineral site; and new minerals sites.

Finally, in terms of general points, it was noted that minerals covers a specialist area of planning, requiring specific skill sets and expertise. It was suggested that planners are likely to need specialist help when assessing developments.

a) Local development plans should support the 10-year landbank

Although some noted their support for this approach, there were a number of issues raised, or calls for greater clarity around what is intended. Points included that it would help to be clear about what 'the 10-year landbank' is. It was reported that SPP refers to a landbank of permitted reserves for construction aggregates of at least 10 years at all times in all market areas. Other queries included:

- Whether the 10-year landbank relates to gravel or hard rock aggregates?
- Whether the 10-year landbank should include all sites, or only major active sites?
- If it is a minimum or maximum landbank?
- What is meant by 'relevant market areas'?
- What materiality a proposal would have if the 10-year landbank cannot be demonstrated?

There were also queries about who would be responsible for collecting the required data. There was a concern that the requirement will be challenging given past experience of site operators' reluctance to share market information essential for this purpose. There was also a concern that there is a lack of resources to maintain and monitor relevant data sets, and it was suggested that a national database and monitoring exercise would assist. A specific suggestion was that the Scottish Government should instruct the British Geological Survey to provide each local authority with a review of the relevant minerals within its area. This information could then be used to inform the LDP.

Other comments included that it would be helpful if the approach was based on the maintenance of at least a 10-year landbank, rather than setting 10 years as a target. It was suggested that this would have the benefit of encouraging longer-term provision where possible. In terms of the benefits of longer-term provision, observations included that:

- Good quarry development requires significant capital expenditure. The need for a long-term approach is likely to be accentuated by future investment decisions for low carbon transition, such as electric plant and facilities or further rail connections.

- Mineral operators and mineral planning authorities should be encouraged to take a long-term approach to mineral planning permissions to ensure a steady and adequate supply of minerals to meet demand.

A very specific point was made in relation to existing permissions for mineral workings granted under the Town and Country Planning Act 1981 under which, where no end date could be specified, a proxy end date of February 2042 was attributed. It was suggested that, to avoid any future disruption in continuity of supply, this needs to be addressed through NPF4 as it falls within the plan period.

Other points made about the landbank included that this is a strategic issue that would be best addressed through Regional Spatial Strategies.

b) Fossil fuels

A number of those who commented on this aspect of the proposed policy welcomed the statement that the exploration, development and production of fossil fuels will only be supported in exceptional circumstances. There was also a view that further clarity, and a better definition, will be required to assist development management decision-making processes. In particular, it was suggested that guidance is required around what might constitute exceptional circumstances.

Others thought that the exceptional circumstances qualification should be removed, with an associated suggestion that any case could be considered as an exception based on other material considerations, and it should not be written into policy.

However, there was also a view that it is unrealistic to depend exclusively on renewable energy sources and that some dependence on fossil fuels will be essential to enable the transition to net zero. The example given was in relation to supporting existing offshore wells, and in the continuing development of the cleaner use of fossil fuels through carbon capture. It was suggested that the continued need for future oil and gas supply needs to be recognised, not only to meet demand for hydrocarbon based products such as bitumen, rubber and plastics, but also to minimise dependence on imports.

c) Unconventional oil and gas in Scotland

There was support for the unequivocal statement in this policy that the Scottish Government does not support the development of unconventional oil and gas in Scotland. However, there was also a view that this does not equate to policy, but rather represents the view of the Scottish Government, and it would be better, and in line with other policies, to simply state that the development of unconventional oil and gas is not supported.

Others suggested that 22(c) should be worded more robustly and state without any hint of equivocation that such development is effectively prohibited.

d) Extraction of aggregates

In relation to 22(d), there was a concern that the current wording may have the unintended consequence of not supporting the extraction of non-aggregate materials, such as dimension stone. It was suggested that, as the extraction criteria

set out are relevant for all types of minerals, the reference should not be only to aggregates.

Some welcomed the emphasis on minimising potentially adverse impacts on a range of environments, but there were also some suggested changes or additions. These included that:

- The policy should require biodiversity net gain, not just no adverse impact.
- Proposals should be required to demonstrate how adverse impacts will be prevented prior to planning permission being granted.

Other comments included that the reference to adverse impacts needs to be qualified, and should be amended to refer to 'significant adverse impacts'. It was reported that all developments have some form of adverse impacts, but it is well understood in EIAs that all potential effects and impacts should be identified, then consideration given to mitigation and the significance of any residual impacts.

A similar comment was that, while the reference to ensuring adverse impacts on the historic environment are considered, the wording is not proportionate or workable. It was suggested that what is needed is a considerate and proportionate response to managing the impact on those assets, by avoiding and minimising adverse impacts as far as possible, and offsetting any unavoidable harm with public benefits, such as new knowledge gained through archaeological investigation of assets.

Other respondents highlighted the opportunity for aggregate and mineral sites to have great potential for biodiversity enhancement and diversification, including through the emergence of new SSSIs.

Comments in relation to providing an adequate buffer zone included that this seems to be being left to local authorities to determine, and that further detailed guidance is needed on who defines the zone and what is considered adequate.

Other comments on 22(d) included:

- Regarding the impact of noise, nuisance and potential pollution, there is limited further environmental regulation in this sector, and there may be scope to involve other agencies such as SEPA. There were also concerns regarding how acceptable levels of pollution can be defined. It was suggested that standards will be required.
- Stronger statements about protecting and sustaining the quality of the water environment would be welcome.
- Guidance is required on who pays for ongoing maintenance and how this is to be controlled.

Regarding financial guarantee options, there was general support for this concept as a safeguarding measure and a suggestion that financial or secured bond evidence should be monitored regularly, for example on an annual basis.

However, it was also noted that it is unclear if financial guarantee options are expected to be used for every mineral extraction site. It was reported that in some areas mineral extraction sites are typically small scale, and the use of financial guarantees has the potential to make the operation of a site unviable. In an island context, there was said to be a need to balance the environmental and economic costs of importing minerals from the mainland if there are no local mineral extraction sites operational.

With respect to restoration and aftercare, there were suggestions that more needs to be said regarding what constitutes a 'high standard'. Some suggested a strengthening of the wording to prioritise biodiversity and nature-based solutions, including those new habitats that have evolved as a result of the extraction process. It was suggested that:

- Proposals for restoration should be focused on biodiversity enhancement, including, where appropriate, capitalising on any valuable habitats that have been created through the operation of the scheme, such as shelter plantations or wetlands.
- There is an opportunity to specify the creation of a nature reserve as a preferred option for end use of extraction sites rather than reverting to agricultural use.

e) Borrow pits

Although there were relatively few specific comments about borrow pits, issues that were raised included:

- They should only be supported where there is very clear justification, particularly on grounds of sustainability. The case for borrow pits is understandable in remote developments where hauling material from an existing consented quarry could have significant CO₂ and financial costs. Elsewhere, however, temporary borrow pits can undermine the investments made by mineral operators at established permitted sites adhering to high operational standards.
- The requirement for borrow pits to be subject to their own restoration bonds is of concern. This seems unnecessary when borrow pits for construction would be tied to a specific project and be time limited.
- The basis of applying a separate criterion is fundamentally undermined by the requirement to comply with the mineral extraction criteria set out in 22(d).

Connected to this last point was the suggestion that 22(e) should be amended to decouple the assessment of borrow pits from 22(d), and should set out an alternative test requiring the avoidance of unacceptable likely significant adverse environmental effects.

Policy 23: Digital infrastructure

We want our all of our places to be digitally connected.

Question 44 – Do you agree that this policy ensures all of our places will be digitally connected?

Around 180 respondents made a comment at Question 44.

Most of those commenting on Policy 23 supported its focus on ensuring that all of Scotland's places are digitally connected, and felt that the policy provides a positive framework against which delivery of digital infrastructure can be assessed. There was also support for the particular focus on areas with no or low connectivity, reflecting a view that existing initiatives have not done enough to improve digital connectivity in remote and rural areas, although some wished to see a more universal approach across Scotland.

Respondents highlighted the importance that all parts of Scotland have access to suitable digital infrastructure, with reference to the negative economic impacts of poor digital connectivity, particularly in rural areas. Specific reference was made to the importance of universal access to digital connectivity to support homeworking and 20-minute neighbourhoods, and to the vulnerability of some communities to loss of digital connectivity. Comments also highlighted potential for poor digital connectivity to undermine rural repopulation and economic growth. In this context, there were calls for Policy 23 to highlight links with Policy 7 (Local living) and to ensure digital connectivity is resilient to adverse weather events. Some also wished to see a firmer commitment to eliminating the digital divide between Scotland's communities, including a particular focus on ensuring rural development supports this, and a suggestion that the Scottish Government should treat digital connectivity as a right.

While it was acknowledged that policy support will remove some barriers to provision of digital connectivity, respondents also highlighted the risk that insufficient funding and investment could undermine delivery of the policy. Potential for the cost of infrastructure development to limit the roll-out of digital connectivity, particularly in sparsely populated, remote rural areas was noted.

Respondents wished to see detail on how the investment required to support the policy will be secured. This included specific calls for public funding, reflecting a view that developer contributions alone will not be sufficient for policy delivery. Respondents also wished to see reference to the IIP and National Development 6 (Digital Fibre Network), and to links with other policies and strategies such as the Digital Planning Strategy for Scotland, Housing to 2040, and Building Standards.

Other suggested amendments included:

- Recommending using other development as opportunities to improve digital infrastructure, for example ensuring that ground works such as burying of cables or pipes incorporates fibre. It was also suggested that major

infrastructure developments should be required to demonstrate how they contribute to digital infrastructure.

- The policy should consider demand, for example by requiring planning authorities to anticipate future digital needs and signalling this to developers and infrastructure providers.

There was concern that there is no reference to 5G connectivity, reflecting a view that this should have a significant role to play for digital connectivity in the short to medium term.

a) LDPs should support the delivery of digital infrastructure, particularly in areas with gaps in connectivity and barriers to digital access

Many of those commenting on 23(a) welcomed the role of LDPs in supporting delivery of digital infrastructure, although some noted that this is likely to have the greatest impact for new development. Respondents also highlighted that this will require LDPs to identify communities with poor connectivity, to inform delivery of necessary infrastructure improvements. It was suggested that LDPs should be required to include an assessment of current digital infrastructure.

Several respondents sought further detail on specific 'barriers to digital access' that should be overcome, including how these relate to planning policy. Comments included specific reference to:

- Barriers to more efficient upgrading of masts to 5G.
- Barriers to multi-operator sharing of sites to support the Shared Rural Network, requiring developers to include full fibre with all new development.
- The guarantee period for roadworks reinstatement.
- The complexity of wayleaves, and practical issues around access to premises for providers.

There were also calls for further guidance on the specific planning policy that LDPs should include to support Policy 23, including concern that some parts of 23(a) are outwith the remit of the planning system. In this context, the importance of a partnership approach to the delivery of digital infrastructure was highlighted, including alignment of infrastructure provider priorities. There were calls for Scottish Government support to ensure that service providers fully support the policy.

b) Development proposals should incorporate appropriate, universal and futureproofed digital infrastructure

While support was expressed for the delivery of universal and futureproofed digital infrastructure, respondents were also concerned that 23(b) does not include sufficient detail to ensure the consistent assessment of development proposals required to deliver this infrastructure. There were also calls for clarification of terms such as 'appropriate', 'universal' and 'futureproofed', to inform its implementation. This included a perceived need to include guidance on how planning authorities should assess whether digital infrastructure will be appropriate and futureproofed, and calls for specific metrics or criteria against which development proposals should be measured.

Reference was made to the speed of technological change in digital connectivity in the context of futureproofing development and some respondents suggested specific requirements to ensure proposals are appropriately futureproofed. These included calls for all digital infrastructure to be gigabit capable fibre optic from exchange to premises, (including reference to barriers to replacement of existing copper cable in rural areas), and for all new development to include full fibre or ultra-highspeed connectivity.

Other issues and amendments suggested included:

- NPF4 should provide assurance that planning authorities can refuse development because it does not make provision for digital infrastructure without fear of this being overturned.
- Clarity was sought on whether 23(b) should be interpreted to require that rural development should only be supported where sufficient digital infrastructure is in place, or can be provided, as part of any development.

c) Development proposals delivering new digital services or improvements should be supported, particularly in areas with no or low connectivity

Many of those commenting on 23(c) expressed support for the delivery of new infrastructure and services, and the focus on areas with no or low connectivity. Respondents highlighted the potential for gaps in connectivity to act as a barrier to local investment and inclusive economic growth, particularly in rural areas.

There were also calls to include specific reference to the role of affordability in ensuring access to digital services, including suggestions that the policy should prioritise areas affected by deprivation. Respondents also highlighted potential for digital exclusion to reflect limited access to, or ability to use, digital technologies and wished to see this acknowledged.

There was concern around preventing planning authorities from questioning developers. Respondents acknowledged the need to support delivery of digital infrastructure and noted that the designation of a significant element of telecoms development as permitted development already limits the role of planning authorities. However, some suggested that 23(c) is overly permissive and does not address potential for the policy to result in adverse environmental impacts. This was reflected in calls to recognise that delivery of digital services and improvements must take account of potential adverse impacts on amenity, landscapes and local communities. This included suggestions that further guidance is required to help planning authorities balance digital connectivity benefits with other planning considerations, and calls for better evidence on gaps in digital connectivity.

Respondents also referred to a need for wider guidance to inform assessment of proposals' alignment with local or national policy objectives and it was suggested that developers should be required to justify specific proposals against local and national objectives.

d) Telecommunications development proposals should minimise visual and amenity impact

Many of those commenting on 23(d) supported a focus on minimising the impact of telecommunications development proposals, particularly visual and amenity impact. Respondents also welcomed reference to the shared use of existing sites to minimise adverse impacts, noting that this has been the approach used in the delivery of 5G infrastructure. However, some wished to see NPF4 explore how this can be further encouraged, to avoid the proliferation of single operator facilities.

Respondents acknowledged the need for telecommunications development, but there was also concern that planning must ensure that telecommunications infrastructure is sited to avoid adverse impacts on streetscapes and natural environments. Several respondents noted the potential for this kind of development to have significant localised impacts, particularly in the context of larger masts required for 5G connectivity, and the extension of permitted development rights to include larger installations. There was also concern around the potential impact of development in areas of local or national significance, including a particular focus on protecting these to support the response to climate change and nature recovery. It was suggested that the requirement to minimise visual and amenity impacts should apply to all digital infrastructure.

Discussion of visual and amenity impact included particular reference to the potential for telecommunications development to have a negative impact on biodiversity and the natural environment (including in National Parks and areas of scenic importance), the historic environment, residential areas (including restriction of walkways), and schools. There were calls to more explicitly acknowledge this, and to cross-reference with other relevant national policies. It was suggested that 23(d) should set out a hierarchy for the deployment of telecommunications, to ensure that new development does not take place without proper consideration of the potential for replacement of existing infrastructure, or mounting on existing sites or structures. There were also calls to support the use of below ground infrastructure in urban areas or sensitive landscapes.

Some respondents saw a need to acknowledge the technical constraints on infrastructure providers, and limits on the extent to which siting and design can minimise adverse impacts. This was thought especially important in areas of particular landscape value or sensitivity where minimising impact can be particularly challenging. It was argued that planning decisions in these areas should balance adverse impacts with social and economic benefits to local communities.

e) Development proposals likely to adversely affect the operation of existing digital infrastructure or strategic roll-out plans should not be supported without appropriate mitigation

Respondents welcomed the requirement for development proposals to mitigate any adverse impacts on digital infrastructure.

Some saw a need for further efforts to ensure that all of Scotland's places will be digitally connected, including a requirement to address what was seen as failure of

the market to support isolated households and small communities. However, others raised concerns around the potential for 23(e) to result in digital infrastructure having an adverse impact on their surroundings, particularly on sites that have already been designated for development in the LDP. There were calls to set out further detail on how the protection of existing digital infrastructure should be balanced with other considerations.

Further guidance and examples were sought to support planning authorities' assessment of development proposals and mitigation measures. This reflected concern that planning authorities may lack the technical knowledge and expertise required to assess impacts on the operation of existing digital infrastructure or delivery of roll-out plans. It was also noted that information is not readily available to enable planning authorities to identify which developments are likely to affect existing infrastructure, and there were concerns that authorities may be reliant on those proposing new development. Suggestions to address this issue included:

- A requirement that development proposals include an evidenced statement that proposals will not affect existing infrastructure.
- Planning authorities should consult with network providers and/or apply the Agent of Change principle for development near existing infrastructure.

Part 3 - National Planning Policy, Distinctive Places

Nine policies are included under the Distinctive places theme.

Policies 24 to 27: Distinctive places

We want our places to support low carbon, healthier urban living.

Question 45 – Do you agree that these policies will ensure Scotland’s places will support low- carbon urban living?

Around 255 respondents made a comment at Question 45.

Policy 24: Centres

a) Supporting sustainable futures

There were positive comments on the role of LDPs in creating sustainable futures for cities, towns and local centres, alongside the principles of 20-minute neighbourhoods. There was also support for the role of public transport, although it was suggested that it could be given greater emphasis.

It was also suggested that there would be many instances where the principle of 20-minute neighbourhoods cannot easily be applied, or where significant flexibility will be required. For example:

- Some respondents noted that 20-minute neighbourhoods will not be realistic in many rural areas, and especially for commuter settlements.
- It was suggested that there could be a standalone policy for city centres, as they present different challenges and are unique in scale, including because of the role they play in wider regional economies.

It was also noted that 24(a) could have cross-boundary implications, which should be acknowledged.

Respondents suggested that a definition for ‘local centres’ would be helpful, as would an explanation of what is meant by ‘networks of centres’.

b) Improving vitality and viability

There was some support for the policy aim of expanding the range of uses in town centres, and acknowledgement that planning has a vital role to play in determining the right mix to ensure centres’ long-term vitality and sustainability.

However, there was also a concern that the wording of 24(b) is unclear in places and would allow for different interpretations. A definition of the appropriate ‘mix of types of development’ was requested, and it was suggested that in its current form, the policy appears to be counter to Policy 25 (Retail).

Other comments or suggestions included:

- There is no reference to town centre health checks, which may be helpful when considering the vitality and viability impacts of proposals.
- There should be greater recognition of the role cultural assets can play in improving the vitality of town and city centres.
- To avoid losing the fundamental functionality of a town centre, more guidance is required on the cut-off for residential development within town centres.

Policy 25: Retail

a) Development generating footfall

There was support for the presumption against edge-of-town and out-of-town retail developments, and the aim of preserving the landscape and revitalising town and city centres. However, there were concerns that 25(a) could potentially damage existing out-of-town centres. It was noted that these centres would have to be re-purposed, or they would have multiple vacant units and would become problematic.

It was argued that the policy takes a one-size-fits-all approach to retail development, with an urban-centric approach that fails to appreciate the challenges in smaller villages and towns across Scotland. The associated concern was that this could deprive communities in more rural locations of the benefits of new development. An example given was of an island community where appropriate development that supports the population is being considered, providing that the economic and social activity proposed does not conflict with other policies in the LDP.

Respondents were also looking for further information about:

- Whether 'out-of-town' means out-of-centre or outside the urban area?
- If plans would be required to define which areas are on the edge of the centre, and if they need to specifically support or preclude development in these locations?
- How 'significant footfall' is to be assessed?

There was also a question about the types and scales of retail development that may not be appropriate for town centres. The specific example of garden centres was given as a destination usually located out-of-town.

b) Impact on character and amenity of an area

25(b) was described as essential to preserving the character of rural settings and designated conservation areas. Other comments included that a definition for 'acceptable impact' is required. Queries included:

- How can a planning authority or developer demonstrate compliance with this policy?
- How should acceptable impacts be addressed given the cross-boundary nature of these proposals?

It was also suggested that it is not clear whether a planning authority can refuse an application for a betting office or takeaway near other similar businesses, where it would result in the reuse of a long-term vacant premise that may otherwise continue to sit empty.

c) Avoiding clustering of some non-retail uses

In terms of the terminology used, there was a call for a definition of a 'disadvantaged area'. It was also suggested that guidance on the information to be used to assess whether an area is disadvantaged would be helpful and could support a consistent assessment approach across the country.

There were some issues and concerns about the concept of clustering, including a query about the degree of clustering deemed unacceptable. Other comments included that:

- There is currently no means to provide blanket controls to limit specific uses such as betting offices and moneylending premises. There was a concern that this could result in the application of 25(c) being challenged.
- It is unclear how the clustering of specific uses can be avoided without changes to current use class definitions and the underlying principle that competition is not a material planning consideration.
- The policy could consider food vans in the vicinity of primary and secondary schools, as well as play and sports areas.
- It should contain a clear presumption against drive-through retail.

Finally, it was suggested that 25(c) should be extended to prevent clustering of retail outlets that damage health and wellbeing outcomes, including where the sale of alcohol, tobacco or unhealthy food is central to the business model.

d) Neighbourhood shopping

Comments on 25(d) included that a more proactive approach could be taken to increasing the provision of fresh food, with priority given to outlets which support easy access to healthy, nutritious and sustainable food. It was suggested that this is particularly important in more disadvantaged areas. However, there was also a concern that it is a policy which would be difficult to implement in practice and that it is difficult to envisage how planning can influence 'fresh healthier food and drink provision'.

Other respondents commented that 25(d) should be expanded to include a broader range of businesses that negatively impact health outcomes and should be linked with a requirement for an HIA.

Respondents asked for further detail on 'proposals for neighbourhood shopping', and a 'sequential approach'.

e) Islands and rural areas

There was support for the ambitions set out at 25(e), although there were also queries about the type of businesses it is aimed at. It was suggested that the

phrase 'ancillary to other uses such as farm shops' is unhelpful and too restrictive, raising questions as to whether or not other types of shops in rural areas are to be supported. It was also suggested that 'small scale' should be defined.

Policy 26: Town centre first assessment

a) Other uses which will generate significant footfall

There was support for the focus on town centres and the recognition of their importance in many aspects of placemaking, health and quality of life. The further restrictions on out-of-town shopping proposals were also supported.

Further comments included that:

- Education and healthcare facilities are generally best located locally, at the heart of their neighbourhoods, and this may not be in a town centre. For these types of uses, referencing locations that support the 20-minute neighbourhood concept may be more appropriate.
- Accessible business parks outwith town centres can provide appropriate and legitimate locations for new offices, and proposals within such existing parks should not have to undergo a town centre first assessment.
- Some locations outwith the main centre have become 'mini town centres'. They can have a high concentration of footfall and activity, with a range of retail, leisure and food options, supported by car parking. 26(a) should address their future, especially where the neighbouring traditional town centre is declining.
- Some planning authorities with small urban areas, such as in island settings, will not have edge-of-town designations.

It was also reported that the issues covered at 26(a) may have cross-boundary implications, and it was suggested that this should be acknowledged.

Some respondents raised particular issues about drive-throughs, including suggestions that the development of drive-throughs must be limited to prevent the cumulative effects of carbon emissions by vehicles. There was also a call for guidance, especially around drive-throughs becoming secondary to 'sit in' areas.

Other respondents raised issues about terminology or parts of the policy that they considered to be unclear. These included:

- The policy appears to apply to non-retail uses. If this is intended, it should be explicit.
- A definition of 'significant footfall' should be provided. Without an explanation, the term is potentially subjective and open to interpretation.
- How will 'significant' be measured as it relates to 'vitality and viability'?
- Is it for the planning authority to demonstrate that a proposal could be reasonably altered or reduced in scale? It was suggested that this will be difficult to establish and raises the issue about what is meant by 'reasonable'?

Some respondents were concerned that 26(a) would mean that all new development will require an assessment to ensure no significant adverse effect on the vitality and viability of existing town centres. Respondents commented that this seems overly restrictive, and that a threshold/trigger-based approach should be retained, removing the need for detailed planning assessment work on small-scale proposals.

Other respondents observed that, whilst proposals with high footfall are most appropriate in town centre locations, it is also essential to recognise that many existing town centre facilities are already pressured. It was noted that there is often no choice but to consider land on the periphery to deliver adequately sized facilities, such as medical centres and others. Similarly, it was suggested that the town centre first approach should not preclude the development of healthcare facilities, libraries or shops in existing edge of town developments if they contribute to making a residential area closer to being a 20-minute neighbourhood.

b) Relationship of the proposed development with a network of centres

Some respondents raised concerns about the requirement for the sequential test to consider 'supply chains' and whether local suppliers and workers are a 'viable option'. It was suggested that the extent to which this can be managed through planning consent is limited and that planning authorities are unlikely to have expertise on supply chains and how to assess them, or how to assess the environmental impact of the transportation of goods, staff and visitors. It was noted that being required to undertake such assessments would have resource implications for planning authorities.

In terms of points of clarification of further information, the following were highlighted:

- How 'town centre first assessment' and 'economic impact' are being defined?
- How the impacts on the town centre should be assessed, and what type of information should inform a town centre first assessment?
- Whether it is a requirement on developers or applicants to prepare an assessment for the planning authority's review?

c) Community, education, health and social care, sport and leisure facilities

Comments on 26(c) included concerns that it may place additional requirements on the evaluation of planning applications at the development management stage. Other comments or suggestions included that:

- 26(c) would be strengthened by stating that community, education, health and social facilities will be easily accessible to the communities they serve through walking, wheeling and cycling.
- The policy is open to interpretation, and some of the language, such as 'flexibly and realistically', should be revisited.
- The phrase 'consideration should be given' should be altered to make it mandatory to provide sufficient space for walking, wheeling and cycling.

Policy 27: Town centre living

a) Encouraging town centre living

Comments on 27(a) were often focused on the implications of making housing land available for town centre living. Some respondents felt that the policy should be revised. There were concerns that, as currently written, it could undermine a town centre's vitality and overall function. Further points raised were that:

- For planning authorities to provide a proportion of their housing land in city and town centres is an onerous requirement. It was noted that no guidance on how an assessment should be undertaken is provided.
- A definition of 'a proportion of the housing land requirements', and explanation of where the proportion is to be derived from, is needed. It was suggested that any sites identified must be required to meet the standard tests of deliverability, particularly on noise/parking constraints, surrounding use and access.
- There is no cross-referencing to Policy 9 (Quality homes) and a lack of clarity on the role of both HNDAs and LHSs.
- If the expectation is that planning authorities will use other powers to assemble sites and deliver development, this should be clearly articulated.
- There may be challenges associated with ensuring that key community infrastructure, such as healthcare facilities and schools, have sufficient capacity.

Other respondents commented that allocating sites for residential development within town centres should not be at the expense of placemaking principles or amenities.

b) New residential development

There were some concerns that 27(b) could be open to interpretation. For example, how much scope is there to be flexible around the viability of a building and can planning authorities have control over the extent of what needs to be demonstrated?

Other comments addressed viability, and included that:

- Its meaning should be clarified. It was suggested that it should not be limited to commercial considerations as this could threaten positive restoration.
- What would viable mean for a non-profit culture venue? What value or viability would an existing use need to demonstrate?
- A definition of non-viability is required, along with further information on how a planning authority or developer can demonstrate compliance with criteria and metrics.
- Where a proposal for housing reuses a vacant town centre building, how is the non-viability of the former use to be demonstrated? Would this be through

proof of marketing for a set period, with little to no interest based on its former use?

It was also noted that 27(b) would require developers to demonstrate that the existing use of a building is no longer viable in advance of residential use being supported. It was suggested that this is at odds with Policy 30 (Vacant and derelict land), which encourages the reuse of buildings.

c) Conversion or reuse of vacant upper floors for residential use

While there was support for the conversion of upper floors in town centre locations, it was recognised that there are often significant issues surrounding residential amenities that limit the viability of such development. This was said to be especially true in denser environments and when dealing with buildings that are not designed to be residences.

It was noted that determination would be dependent on other policies and circumstances, such as flood issues, which could make proposals unsuitable. It was suggested that 27(c) should include the phrase 'subject to compliance with other policies in the plan'.

Finally, it was noted that there could be issues around ownership and amenity, particularly for conversions of buildings or parts of buildings.

d) Residential use at ground floor level

It was suggested that this policy is not consistent with the 20-minute neighbourhood concept, including because businesses on the ground level provide more opportunities for residents to socialise, and their frontages result in more positive perceptions of public space.

There were concerns that if a ground floor unit is lost to residential accommodation, it is unlikely to be brought back into use as a shop or other public-facing business or facility. It was suggested that planning authorities should be able to apply discretion in the application of 27(d) so that the repopulation of a town centre does not come at the cost of its overall vitality and functional purpose. Other respondents noted that the policy does not include a presumption against the loss of retail units and raised the potential for speculative re-development, even if the current retail use is viable.

Finally, it was suggested that the meaning of the phrase 'undesirable concentration of uses', as it relates to housing, is unclear.

e) Residential amenity

Comments on 27(e) included that further policy details around hot food takeaway, cafes, bars and restaurants, and displays of advertisements would be helpful. It was also suggested that entertainment venues, where issues may be around noise, could be included in the list of uses for residential amenity.

It was noted that there is no mention of seeking to create a high-quality design, green space/public realm, or amenity for new developments. This led to some

concerns that 27(e) may set a low bar for expectations of town centre living and residential proposals.

Policy 28: Historic assets and places

We want to protect and enhance our historic environment, and to support the reuse of redundant or neglected historic buildings.

Question 46 – Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings?

Around 245 respondents made a comment at Question 46.

Overall views on this policy were mixed. Many respondents welcomed the protection and enhancement of the historic environment, and there was support for the reuse of redundant or neglected historic buildings. However, there were also concerns that the current wording of the policy could prevent developments that address climate change issues from going ahead. Some respondents referred to SPP, and were happy to see elements retained in NPF4. Others felt it was essential to go beyond the status quo.

a) Identifying, protecting and enhancing historic assets and places

It was suggested that a critical omission at 29(a) is reference to the Historic Environment Policy for Scotland. Other comments or suggestions included that:

- The definition of local, regional, national and international should be clarified.
- The policy's wording should be amended to ensure that the delivery of public benefit is the ultimate goal of the identification, protection and enhancement of historic assets and places.
- 28(a) should clarify that development proposals should result in positive enhancements, where possible offsetting harm to the cultural significance of heritage assets where harm is unavoidable.

b) Assessing proposals and projects

Comments at 28(b) included that it is not clear how a 'potentially significant impact' on historical assets or places will be determined. It was also suggested that the requirement for LDPs to consider 'whether further and more detailed assessment is required' is imprecise and could result in disproportionate levels of scrutiny.

In terms of how the policy might be strengthened, suggestions included that there needs to be an understanding that the cultural significance of historic assets should be the starting point for assessing proposals, even if the resulting impact of the development would not be 'significant'. An associated point was that this would reinforce the historic environment as an essential aspect of the local characteristics of a place.

Other suggestions included:

- Ensuring that the assessment of value and meaning of historic assets engages all stakeholders, balancing the priorities of heritage with those of communities and place.
- Being clearer on the mechanisms to establish a benchmark for assessment, including to ensure a consistent interpretation across each planning authority.

Respondents also highlighted other points that they wanted to see covered at 28(b), including:

- The Historic Environment Records and their critical role in identifying and valuing local heritage (Section 140 of current SPP).
- Planning Circular 9/2009: memorandum of guidance on listed buildings and conservation areas, and PAN 2/2011: Planning and archaeology.
- Where proposals have proximity to listed buildings and are within a conservation area, they should be considered in terms of Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

c) Demolition of listed buildings

Respondents made a number of detailed observations on 28(c), including that NPF4 offers an opportunity to strengthen the protection of listed buildings by detailing a stronger presumption against their demolition. An alternative view was that the policy should be expanded to include support for the demolition of listed buildings where development proposals contribute to net zero and deliver other regeneration, sustainability and placemaking benefits. It was noted that demolition incurs no VAT, while repairs incur the full rate of VAT, meaning that demolition of a listed building, rather than repair, can be more financially viable.

Respondents also made the connection between the protection of historic assets and the overarching aim of meeting climate and net zero goals. There was a concern that, where historic buildings and assets require retrofitting or adaptation to meet net zero targets, it could be argued that this would constitute 'works that adversely affect the special interest of a building or its setting' and would not be supported by planning authorities.

Other issues or concerns raised included that:

- 'Exceptional circumstances' and 'all reasonable efforts' need to be defined.
- The exceptional circumstances test is a high bar and could result in many renewable energy proposals, especially for new greenfield wind or repowering, being refused permission.
- It is not clear how an impact on the setting of a listed building without any physical works to the structure would be dealt with.
- 28(c) and (d) appear to overlap. 28(c) refers to 'development proposals for the demolition of listed buildings or other works that adversely affect the special

interest of a building or its setting', and 28(d) covers 'development proposals for the reuse, alteration or extension of a listed building'. Respondents were unsure what constituted 'other works' under 28(c). They also noted that 28(c) has a proviso for 'exceptional circumstances' and 28(d) does not, making it essential to be clear about which policy a development would fall under.

d) Reuse, alteration or extension of a listed building

Those who commented often noted their support for 28(d), sometimes going on to make suggestions for changes or additions. These included that:

- There could be more support for positive change to ensure that historic buildings can be appropriately adapted to the changing needs of the location.
- There is an opportunity to recognise the historic environment's role in bringing benefits through sustainable development, jobs, homes and infrastructure, and supporting net zero.
- There is an opportunity for 28(d) to promote new futures for listed building assets. Economic and sustainable futures for repurposed listed buildings should be encouraged.

Other respondents commented that there are challenges in bringing historic buildings up to compliance with energy efficiency regulations. It was suggested that this could be made explicit in the policy, with sensitive approaches to retrofitting supported. Others felt that some degree of relaxation is needed for the refurbishment and reuse of existing buildings.

Respondents also commented that it is not clear how an impact on the setting of a listed building without physical works to the structure should be dealt with. They noted that impacts on the setting of a listed building are the most frequent types of harm caused by development, and it was suggested that not having a clear and proportionate policy will be a barrier to development.

There was also the view that 28(d) should recognise that, in some instances, the loss of heritage assets may be acceptable to deliver more comprehensive economic and community benefits.

e) Preserving and enhancing the character and appearance of conservation areas

Comments on 28(e) included that it should acknowledge the statutory duties of planning authorities to preserve and enhance listed buildings and conservation areas. Clarity was sought in relation to whether 28(e) relates to development outside a conservation area that impacts the setting (outside the designated area) or developments inside the conservation area that affect the character and appearance of the conservation area (inside the area).

Other comments were that where appropriate, other NPF4 policies should refer to the character and appearance of historic assets as an important material consideration.

f) Demolition of listed buildings in a conservation area

Some respondents felt that the wording of 28(f) does not address the need to remove historic assets that are beyond repair, have no useful future or cannot be safely maintained. It was noted that retaining dangerous buildings can limit places and communities, rather than being an asset.

It was also suggested that the environmental impact of existing buildings should be assessed when deciding whether to reuse or demolish. Further comments included that this could include the identification of potential alterations which would improve climate resilience and biodiversity, and reduce carbon emissions.

g) Existing natural and built features

Some respondents noted that the protection of historic assets should be balanced against the protection of the environment, including any relaxation of historic protections, where the benefit to the natural environment is in the broader public interest.

Another view was that where a development is proposed, or occurs, outside the boundary of conservation areas or other heritage sites and will have a negative impact on the setting, this should be a material consideration.

h) Scheduled monuments

There were differing views around certain aspects of 28(h), particularly about removing the concept of 'integrity of setting' (as set out in SPP, paragraph 145).

One perspective was that the removal of the reference to the integrity of setting is positive, provided that the policy includes wording to clarify the level of impact on scheduled monuments that should not be supported. A contrasting view was that 28(h) introduces a more restrictive set of requirements and would mean that any development proposal that has any adverse impact upon the setting of a scheduled monument (no matter how minor) would be refused permission unless exceptional circumstances apply. The exceptional circumstances test was seen as an exceptionally high bar to overcome, and there was a call for the concept of 'integrity' to be reintroduced.

Other comments included:

- Development critical to safeguarding against flood risk, or substantially contributing to action to combat the climate emergency, may have to take precedence over heritage considerations.
- It should be clarified that development located outwith protected areas may impact scheduled monuments and that this will be a material consideration.
- It should be made clear that demolishing existing buildings should be a last resort. Where it is impossible to reuse historic buildings, the focus should be on deconstruction to preserve materials.

i) Inventory of Gardens and Designed Landscapes

A small number of respondents commented on 28(i), with points including that a development proposal does not have to be within the boundary of a garden and designed landscape to require consideration of its potential impact, in line with the intentions of SPP and as currently reflected in LDPs. It was suggested that NPF4 should set out measures to protect areas where development takes place close to the boundaries.

It was also reported that critical infrastructure can adversely affect views of sites listed within the Inventory of Gardens and Designed Landscapes. It was suggested that an element of flexibility should be included for critical infrastructure, where it is evidenced that there are no suitable alternatives.

j) Inventory of Historic Battlefields

It was noted that there are different policy tests applied to (i) Inventory Gardens and Designed Landscapes and (j) the policy on Inventory of Historic Battlefields, with (j) considered weaker. Respondents asked for a consistent approach in the wording of both policy areas.

Other comments included:

- A development proposal should not have to be within the boundary of a historic battlefield to require consideration of its potential impact.
- The reference to protecting and enhancing a battlefield's significance could be strengthened to emphasise the conservation of battlefields.

k) Historic Marine Protected Areas

A small number of respondents commented on 28(k), including noting that it only applies to development proposals that extend offshore, and excludes certain development types, including those with no offshore elements, such as the construction of coastal defences. It was suggested that NPF4 should also cover these.

It was also noted that development located outwith these protected areas may have an impact on them. There was a call for this to be a material consideration, with development that is considered to have a negative result should not be supported.

l) World Heritage Site

There was a view that natural heritage sites, such as St Kilda, would be better covered under Policy 32 (Natural places).

m) Repair, enhance and bring back into beneficial use historic environment assets

The inclusion of the Buildings at Risk Register (BARR) was welcomed. However, other respondents felt that the BARR is limited in its scope and risks creating a barrier to investment in communities which may lack a conservation area or listed

building. There was support for extending the policy to cover all historic buildings which are currently unused, rather than limiting it to those on the BARR.

n) Enabling development for historical assets or places that would otherwise be unacceptable

It was suggested that 28(n) should be supported by comprehensive guidance to allow a full assessment of project feasibility and viability. There was also a query about whether 'securing the future of a historic place' extends to the climate adaptations necessary to keep it listed and/or conservation area properties occupied and/or active? It was suggested that, if this is the case, it should be specified in the policy.

o) Avoiding adverse impacts

There were a number of suggested additions to 28(o), including:

- A definition of non-designated heritage assets. This definition should ensure that land and buildings of particular significance to local communities, including children and young people, are considered.
- A requirement for pre-determination evaluation. It was suggested that this would enable mitigation options to be explored in advance, and would support the deliverability of development proposals (as set out in detail in PAN 2/2011).
- Reference to activities to provide public benefit. It was suggested that this should allow both planning authorities and applicants greater flexibility to agree on approaches to mitigation or compensation.
- Details on the scope of non-designated heritage assets and the areas that the policy seeks to protect.

It was also suggested that elements currently contained within SPP, but not pulled through into 28(o), should be reinstated. Concerns included that:

- As written 28(o) appears to have the potential to undermine the current positions taken by planning authorities within their LDPs. For example, it was noted that at present it is the developer's responsibility to provide information on the nature and location of archaeological features, including details of any mitigation measures proposed, before determining the planning application.
- There can be numerous non-designated assets in the vicinity of a wind farm development and 28(o) could result in the loss of development on sites that were previously considered appropriate.

Other comments included that 28(o) could be better aligned with NPF4's focus on the retention and reuse of existing buildings. Another observation was that non-designated historic environment assets are often suited to adaptation. There was a call for 28(o) to place greater emphasis on finding viable uses for buildings.

p) Reporting archaeological discoveries

Comments on 28(p) included that it will only permit identification and evaluation activities on known assets rather than previously unknown ones. It was suggested that the policy must ensure that pre-determination evaluation of archaeological potential is protected as a critical part of the planning process.

Other comments included that:

- The role of Historic Environment Scotland should be acknowledged.
- The policy affecting non-designated archaeology assets significantly weakens current planning policies. The existing SPP paragraphs 150 and 151 might be better retained and used instead of the current wording.
- The policy does not acknowledge that archaeological mitigation can occur during development. There was a call for it to be reworded in line with the aims of paragraph 31 of PAN 2/2011 to cover unexpected discoveries of archaeological remains. It was suggested that the issue of enforcement and resourcing should also be addressed in any revision of PAN 2/2011.

Policy 29: Urban edges

We want to increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely.

Question 47 – Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

Around 300 respondents made a comment at Question 47.

There was general support for the use of green belts as a settlement management tool around Scotland's towns and cities to help to direct growth to the most appropriate, sustainable locations. Respondents welcomed their use to help regulate development outside urban centres and limit urban expansion and it was suggested that Policy 29 is generally clear on what is permitted in the green belt.

However, some respondents had concerns about Policy 29, including that it refers to green belt considerations rather than urban edges. The connected concern was that this may encourage planning authorities to adopt a brownfield-only approach.

Others noted that urban edges are potential locations for sustainable sites for housing and may be cheaper and easier to develop than greenfield sites. It was suggested that the policy should be revised to enable planning permission for developments on urban fringe sites, where these can achieve 20-minute neighbourhoods and contribute to net zero objectives.

There were a small number of specific comments relating to smaller communities and island settings. These included that:

- Villages should not be allowed to expand incrementally around the edges without improved infrastructure or services.
- For island communities, the green belt designated as the countryside has no protection and can lead to a 'develop anywhere' policy.
- Urban edges in some areas (for example, crofting counties) are subject to other legislative processes, such as crofting law which influence the use of land and pattern of settlement.

Some respondents pointed to areas where more guidance or information is needed. These included in relation to:

- The definition of 'urban edge' and 'green belt'.
- The exceptions to green belt protection. It was noted that these are more extensive in NPF4 than in SPP, and there was a call for more information on their implementation.
- Potential overlap with Policy 31 (Rural places). It was suggested that Policy 29 and 31 could cover the same land and that clarification is needed.

Other issues raised included that many developers see the lack of consistency around green belts as a planning risk, mainly where neighbouring local authorities take opposing approaches to the same green belt. It was also suggested that there is a policy tension between Policy 9 (Quality homes) and Policy 29's aim of limiting urban expansion.

There were a number of specific comments on the relationship between Policy 29 and climate resilience, biodiversity and natural habitats. These included that:

- It fails to mention restoring nature and improving habitats. It was suggested that the opportunity to enhance green corridors and networks, ensuring connectivity between habitats, should not be missed.
- The role of green belts in relation to climate resilience could be strengthened by requiring LDPs to consider how they can deliver multiple benefits, including reducing flood risk and supporting access to nature.

a) Using green belts in pressurised areas

There were a number of issues about which further information was sought, including:

- The definition of 'urban density' or level of residential density - high, medium and low. It was suggested that an explanation of densities would help remove any uncertainty when planning authorities specify site requirements in LDPs.
- What is meant by 'significant danger', 'peri-urban' and 'adequately demonstrated'?
- How increased density of settlements can be achieved?
- The evidence required when considering green belt designation. In particular, how would this justify green belt designation around the whole settlement?

There were concerns about green belts being directed towards the most accessible areas, including because these are the most sustainable in terms of public transport access. Other comments included that development in peri-urban areas, or on the fringes of settlements, is not inherently unsustainable as 20-minute neighbourhoods could be, and should be, easily introduced.

b) When developments on green belts can be supported

General comments on this policy included that there is no mention of biodiversity or linkages with the 20-minute neighbourhood concept. It was suggested that the list of exceptions which should be supported in the green belt should include those associated with biodiversity, conservation or enhancement, including nature networks. It was also suggested that it should be made clear that potential exceptions to 29(b) should be compatible with countryside or natural settings.

There was a call for statutory access rights to be referenced.

The remainder of the comments focused on specific proposals that could be supported within the designated green belt.

Housing for new or retired workers in primary industry

There were several comments on how this provision would work in practice. They included that the inclusion of new houses for retired workers seems inconsistent with the otherwise higher threshold for all but essential development in protected areas. A connected view was that the current policy on new accommodation is too general and permissive and should be strengthened by adding criteria on whether the type of business in which the worker is employed is an appropriate and viable rural business.

Other comments included that:

- A definition of a 'primary industry' is needed.
- Further explanation is needed on what is meant by 'no suitable alternative accommodation available' for retired workers.
- Provision could be made to stop houses from being sold on the open market, for example when a retiree dies or moves elsewhere.

Horticulture, including market gardening and directly connected retailing

Some respondents expressed concerns that the reference to 'directly connected retailing' could justify sizeable retail garden centres with associated catering and retail developments, encouraging unsustainable travel rather than on-site horticulture or market gardening.

Recreation, outdoor sport, leisure and tourism uses

Respondents raised potential issues, including that this provision could open up the possibility of larger scale suburban development. It was noted, for example, that tourist cabins require facilities, access and servicing and it was suggested that this would erode the green belt.

Other comments included that an emphasis on compatibility with the countryside and natural setting is needed and that there is an opportunity to be explicit about access rights and the necessary infrastructure to protect these rights.

Flood risk management

It was suggested that, if assessments show that only intrusive protection measures can manage flooding, there should be a plan for how this is combined with blue and green measures to ensure adaptation, mitigation, and biodiversity.

National requirements of established need

There was a call for the phrase 'development meeting a national requirement or established need' to be defined.

Essential infrastructure that cannot be accommodated elsewhere

It was suggested that healthcare facilities should be included as 'essential infrastructure'.

Mineral operations and renewable energy developments

Comments on renewable energy included that 29(b) appears to require any renewables developments to be within an 'area of search', despite there being no reference to the designation of such areas within NPF4. It was also reported that there is no previous reference to this designation within the parameters for wind farm spatial frameworks set out in SPP.

Other concerns included that 29(b) appears to introduce stringent requirements on renewable energy developments that do not exist at present. It was suggested that this ignores the historical presence of wind farms in green belt locations, does not recognise that wind farm development can be compatible with the core purpose of green belts, and fails to recognise that the principle of the development will already have been established. However there was also a concern that 29(b) appears to be open to any renewable energy proposal without considering impacts.

Finally, it was noted that minerals can only be worked where they occur, which could be in the green belt.

Intensification of established uses

Comments included that there should be a requirement to make use of existing or replacement buildings whenever possible.

It was also suggested that it should be clearer whether 29(b) is referring to intensification within the boundary of an existing use, or whether it would permit increasing extent. The associated suggestion was that it may be appropriate to specify that this relates to intensification within the boundary of the established use.

Reuse, rehabilitation and conversion of historic environment assets

Respondents welcomed the inclusion of the requirement to safeguard historic environment assets. However, there were calls for stricter wording regarding appropriate uses.

One-for-one replacements of existing permanent houses

There was a concern that the position on 'one-for-one replacements of existing permanent houses' seemed very permissive if a net zero approach is being encouraged. It was suggested that 29(b) should include a requirement to justify the replacement of any dwelling, together with criteria to control the scale, size and character of proposals to avoid widespread replacement of smaller cottages with large houses.

There was a query as to why the provision is restricted to houses currently in occupation. It was suggested that a net improvement on the existing house - in terms of energy efficiency, design and impact on green belt character - should be supported in principle, and even if the property is unoccupied.

Other comments included that the policy should state that any replacement should be of a similar scale, footprint, character, height and massing to the dwelling being replaced.

c) Development proposals requirements

The requirement to provide a statement explaining the search area and the reason why a development requires a green belt location was welcomed by some respondents.

Others raised issues, including that the policy refers to the purpose of the green belt at that location, without stating what that purpose might be. It was suggested that all roles, uses and benefits given in the preamble to the policy, along with those mentioned in part (a) of the policy, should be considered 'purposes'.

Further comments included that the requirement to provide a sequential analysis showing why the location is 'essential', and providing details of other sites assessed and discounted, will be challenging. An associated suggestion was that planning applications should only be required to demonstrate the suitability of a development site to meet policy requirements, and that they should not and cannot look at alternatives. There was a particular concern that, as set out, 29(c) introduces more constraint on renewable development than is currently the case

Also with specific reference to renewable energy it was suggested that, where opportunities exist in the green belt, appropriate assessment criteria would be that they demonstrate how they can enhance the character and quality of the green belt, rather than insisting that they show there are no alternative sites outside the green belt. It was also suggested that 29(c) should be amended to make it clear that renewable energy projects are potentially acceptable green belt land uses and that there is no need for proposals to be located in 'areas of search'.

d) Other types of development on green belt

Comments on 29(d) included that it is not required.

Policy 30: Vacant and derelict land

We want to proactively enable the reuse of vacant and derelict land and buildings.

Question 48 – Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

Around 310 respondents made a comment at Question 48.

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

Other comments included that:

- Vacant and derelict sites can be in areas of multiple deprivation and can have a negative impact on the area and the wellbeing of their residents.
- There can be specific constraints on brownfield land, such as potential flooding, preventing development within or near town centres.
- The policy does not acknowledge the situation in rural locations. For example, there can be brownfield sites located in rural areas which are not suitable for new development.

In terms of general suggestions, the following were made:

- There should be funding for community groups and organisations to empower them to come up with creative and innovative solutions and enable their views to be taken into account.
- The potential for vacant and derelict land to provide strategic and local blue and green infrastructure should be explicitly recognised. Over time, vacant and derelict sites can become a resource to both wildlife and communities, and this should be protected where appropriate. For example, by conversion to allotments or possibly by being incorporated into a green network and allowed to regenerate naturally.
- There should be an explicit policy for developing vacant and derelict land into productive greenspace, providing community benefit.
- As well as supporting a more proactive approach to site remediation, an approach to minimising sites becoming vacant and derelict should be identified.
- The policy title should be amended to clarify that it also applies to vacant and derelict buildings, not solely land.

There was also a general query as to whether only sites on the Vacant and Derelict Land Register would be required to comply with this policy, or if it would apply to any site deemed vacant or derelict by the planning authority.

a) Reuse of vacant and derelict land and redundant buildings

Some respondents noted that the home building sector relies on greenfield, brownfield and vacant and derelict land to meet housing needs. A connected concern was that 30(a) gives no evidence to support why planning authorities should always prioritise vacant and derelict land at the expense of releasing potentially more suitable greenfield sites.

It was noted that there could be valid reasons why land or buildings are not in use for a period of time, for example associated with port authorities, railways, and agriculture. It was also suggested that the wording of 30(a) could make it clear that some vacant sites may 'naturalise' to a condition where reuse is no longer considered necessary, particularly where there are biodiversity benefits.

Other comments on 30(a) included that tackling vacant and derelict land and buildings is challenging, but that there is no funding strategy offered to assist with the delivery of sites. Also in relation to the support required it was suggested that a clear commitment to compulsory purchase powers and sales orders is needed.

b) Permanent or temporary reuse of vacant or derelict land or buildings

Those who commented generally offered their broad support for 30(b), although it was suggested that there should be a distinction between urban and rural brownfield land, along with how proposals for each will be considered.

Other suggestions included that a definition of 'temporary' is needed, along with guidance on suitable timeframes.

As more generally, it was also noted that not all vacant and derelict sites are in sustainable locations.

c) Greenfield sites

Comments included that housing delivery to meet future housing needs will rely on an appropriate blend of greenfield, brownfield, vacant and derelict land coming forward through LDPs. It was suggested that 30(c) would benefit from a definition of 'sustainable brownfield alternatives' and guidance on who will define this. It was also noted that this guidance will be particularly important given that the higher costs associated with brownfield sites are often cited as a barrier for developers.

Other comments included that:

- The potential high biodiversity value on some brownfield sites should be considered. It was suggested that 30(c) should include a requirement for a full assessment of the contribution existing brownfield sites make to biodiversity and that the biodiversity value should inform the approach to any development of the site.

- Where greenfield sites are allocated for development there should be no need to demonstrate that there are no suitable brownfield alternatives, as this assessment will already have been made.

However, other respondents were looking to have 30(c) removed. Reasons given included that:

- Brownfield sites are more likely to have physical and financial constraints, meaning that they often they cannot be delivered with certainty and/or promptly.
- Eliminating all greenfield sites would result in the most deliverable sites not always being brought forward and would have a negative impact on housing delivery rates.

There was a call for a more nuanced approach that would consider developments on greenfield sites where an assessment determines them to be more viable than brownfield sites.

d) Unstable or contaminated land

Comments on 30(d) included that it needs to provide further information on appropriate remediation of contaminated or unstable land. Other comments included that:

- It is not clear who will have to ensure that the land is, or can be made, safe and suitable for any proposed new use, or the extent of the evidence that will need to be provided.
- Land contamination can be present on many sites. Rural areas considered 'greenfield' may have had local uses that have resulted in contamination, such as sheep dips and residential oil heating tank leaks. It was suggested that 30(d) should apply to all developments and not just those on vacant and derelict land.

e) Reuse of existing buildings

Some respondents suggested that 30(e) would benefit from a standard requirement for justifying a building being demolished rather than reused. In terms of the evidence required, a structural survey identifying that refurbishment of an existing building to tolerable standards is not achievable was an example given.

Other respondents proposed that 30(e) should be cross-referenced with requirements on carbon life cycle assessment. It was suggested that this would create incentives which could see the retention and reuse of historic buildings, and especially non-designated ones. There was a call for a stronger emphasis on demolition only as a last resort, including because of the carbon that is embedded in buildings. It was suggested that this would give a clear message on how the planning system addresses the embodied energy and carbon in existing buildings.

However, there was also a view that 30(e) as it stands is overly restrictive, and it is not clear why demolition should always be the 'least preferred option'. It was

suggested that the requirement for this clause is not clear, and that it should be deleted.

Other comments on 30(e) included that:

- Brownfield sites may also be important archaeological sites. The impact of developing these sites must be assessed at an early stage, so that appropriate selection and or mitigation is put in place.
- Brownfield sites may have high ecological value. The impacts of developing these sites must be assessed at an early stage, and adverse consequences avoided and/or mitigated through site layout and design.

It was also noted that other policy frameworks throughout NPF4 deal with the reuse of existing buildings and their associated demolition. For example, Policy 28 (Historic assets and places).

Policy 31: Rural places

We want our rural places to be vibrant and sustainable.

Question 49 – Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

Around 275 respondents answered Question 49.

Some respondents welcomed the inclusion of a policy specifically for rural places, or indicated support for the intent and ambitions set out. However, it was also suggested that the policy is weak, confusing, vague, too broad, or that the support for new development in rural areas risks undermining sustainability and climate change objectives.

There was also a view that, as drafted, the policy will not deliver the outcome of increasing the population of rural areas set out in Section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997. It was suggested that, particularly with respect to housing, the categories of acceptable rural development in Policy 31 are too narrow and that the policy should be reassessed. A more flexible and specific approach to planning policy in rural areas was requested, and there were calls for a presumption in favour of both rural development and community-led development which builds significant community wealth.

Other general concerns included that:

- NPF4 has not been effectively 'rural proofed' and that new and updated policies need to be tested in the rural context.
- Policy 31 fails to recognise the role rural areas will play in helping to deliver additional generation of renewable energy and that some aspects of rural places will inevitably change as a result. It was argued that the interaction with Policy 19 (Green energy) should be recognised.

- Clarity is needed with respect to how Policy 31 relates to Policy 29 (Urban edges and the green belt).

With respect to terminology, it was suggested that it will be important to clarify what is meant by 'rural areas' and 'rural places', and clarity on whether these can include green belt sites, or countryside areas close to large urban areas was sought.

Respondents also commented on topics they would like to see included in Policy 31 or where they felt that greater focus or more detail was needed. These included:

- Improved mobile and digital connectivity.
- Wider land use and agricultural policies.
- Aquaculture.
- Post Common Agricultural Policy agricultural transition in Scotland and Good Food Nation legislation.
- Links to the Land Use Strategy and the Biodiversity Strategy.
- Linkage with Housing to 2040 and the Rural and Islands Action Plan.
- More direction in relation to isolated coast and uninhabited offshore islands.
- The role rural places can make to the transition to a net zero, nature positive society and economy.
- Support for community-led development.
- Rural-specific housing such as housing clusters, rural housing groups and smart clachans.
- Crofting, woodland crofts or hutting.
- Tourism or the sustainability of tourism.
- Protection of landscape character.
- Specific needs of creative businesses.
- Provision for safe active travel in rural areas.

a) LDPs should set out proposals to support the sustainability and prosperity of rural communities and economies

Comments on 31(a) included that it will be important to establish what is meant by 'accessible', 'intermediate', 'remote' and 'areas of pressure and decline' and to be clear which form of the Scottish Government's Urban/Rural Classification is to be applied. The importance of a consistent approach across local authorities was highlighted and inclusion of a map to identify relevant areas was suggested. It was also suggested that the text should make clear that proposed development under Policy 31 will still be assessed against other appropriate policies in the development plan.

Other views included that:

- The requirement at 31(a) for LDPs to ‘set out an appropriate approach to development in areas of pressure and decline...’ is undermined by later sections that set out the approach, irrespective of local conditions.
- There should be greater recognition of the need for a spatial strategy for the area to be developed through the LDP in collaboration with the variety of communities and stakeholders involved.
- The wording in this section is too subjective, and that what constitutes an ‘appropriate approach to development’ needs to be clarified. Requirements or examples should be provided to give local authorities a clear direction about what they must achieve through planning for development in rural areas.
- The range of rural spatial concepts should be rationalised to ensure deliverability, and those producing LDPs should have flexibility to use appropriate policy tools, but not be required to use all of them.

b) Resettlement of previously inhabited areas

Differing opinions were expressed with respect to support for resettlement of previously inhabited areas. While some respondents supported the approach, others highlighted a tension between the resettlement of previously inhabited areas and sustainable placemaking, or raised concerns that the policy may conflict with reducing carbon emissions. It was also suggested that supporting development only where climate change mitigation targets are being met could act as a veto on almost all proposals for resettlement, and that such a test should not be applied to small scale rural housing proposals.

There were calls for clarification of what is meant by ‘previously inhabited areas’ including: at what point in history; how long; what types of habitation; and whether this refers to areas or individual sites.

Some respondents proposed additional factors that should be taken into account before supporting resettlement including:

- Protection of biodiversity and regard to Policy 32 (Natural Places).
- Consideration of the historic environment and Policy 28 (Historic assets and places).
- Landscape character and recognition of the value of attributes such as remoteness, absence of human infrastructure, relative wildness and the predominance of nature.
- Access to services and infrastructure capacity.

c) Development proposals in rural areas

General points on 31(c) included that it is not clear which criteria apply mutually or exclusively, or how they relate to points in 31(d)-(f). Consideration of the issues of lighting, its effects and dark skies was also suggested.

As noted previously, some respondents proposed that rather than conditions for development, there should be a presumption in favour of rural development. There was also a call for renewable energy development to be considered acceptable in principle, or for an exception at 31(c) with respect to infrastructure and renewable energy development. An additional bullet was suggested, supporting proposals where the development will 'provide energy generation from a renewable source, where the proposal supports a zero carbon electricity system'.

With respect to support for development to reflect development pressure, it was argued that policy should be based on evidence of a need for development rather than 'development pressures' that could be unsustainable or contrived through a succession of submissions for unacceptable development. It was also suggested that 'community needs' should be added to the list. Particular concerns were raised with respect to development pressures in the context of National Parks.

With respect to reuse of 'redundant' or 'under used' buildings, it was suggested that definitions are required, including to establish how long a building has to be unoccupied to be considered redundant.

While appropriate use of a historic environment asset was welcomed as a consideration in rural development, it was also noted development can impact buried archaeological remains and addition of a requirement to carry out appropriate assessments as part of the development proposals was requested.

Comments on reuse of vacant and derelict land included that supporting such development only where a return to a natural state is not likely is overly restrictive, and that equivalent wording does not appear in Policy 30 (Vacant and derelict land). It was also argued that:

- Redevelopment of derelict or brownfield land should be caveated, as it could lead to unsustainable development across the countryside and encourage landowners to let land fall into a derelict state in order to benefit from the policy.
- Many areas of derelict land and brownfield sites could be used for community projects such as allotments or sensory gardens, but this is unlikely to be financially viable to a landowner/developer.
- Most sites will naturalise at some point, so the text could be amended to 'can be demonstrated that it will not return to natural state in the short to medium term without intervention'.
- 'Open mosaic habitats on previously developed land' is a priority habitat where much of the value is provided by an artificial mosaic of substrates, hydrology etc. that stops vegetation returning to a natural state. There should be site-by-site consideration of all vacant and derelict land, and where biodiversity value potentially exists, an open mosaic habitat assessment should be requested.

There was a request for clarity on what 'a small site that may not normally be used for housing' means and a concern that affordable housing on small sites could be

supported with no consideration for location or the type of rural area. It was also argued that such sites may be of high biodiversity or landscape value. Suggestions included that only appropriate locations for rural housing should be supported, and that support for development should have regard to accessibility of services and facilities. A role for LDPs in identifying suitable locations was envisaged. The importance of community-led development was also highlighted: there was a suggestion that this provision might be extended to cover a site that is not within the LDP but where it can be shown that there is a significant unmet local need for affordable housing, as well as community support for the site being used.

A majority of respondents who commented on 20-minute neighbourhoods highlighted the challenge that this concept presents in rural areas or argued it is inappropriate for rural areas. It was suggested that flexibility in this respect should be applied when considering development proposals. However, concerns were also raised that this could lead to undesirable housing developments being promoted in small villages, with a request that if the intention is to promote rural services rather than housing, this should be restated more explicitly.

Suggestions included that for a rural context:

- The 20-minute criterion should be removed.
- 20-minute neighbourhoods could be considered as more of a network of neighbouring places in close proximity.
- The policy should refer to contributing towards sustainable settlements and local living.
- The text should be reworded as ‘contribute towards sustainable communities, the provision of local services, or innovative small-scale rural settlement patterns’.

d) Development proposals that contribute to the viability, sustainability and diversity of the local economy

Queries in respect of 31(d) included whether these provisions are intended to apply geographically.

Several respondents proposed additions to the list of types of proposals that should be supported at 31(d) including:

- Renewable energy development.
- Small scale renewable energy – for example community projects.
- Projects which build community wealth.
- Tourism developments.
- Proposals that positively consider the requirements for sustainable transport and do not increase the reliance on the petrol/diesel car.

Comments with respect to diversification included that the first two bullets in 31(d) are broad and require definitions of the types of diversification and businesses that would be covered. A caveat that development should be ‘commensurate with the

rural environment and host community' was suggested and there was also a view that there should be a presumption against the development of croft land. Clarification of the meaning of 'good quality land' was requested, and whether this means prime agricultural land or is open to a wider interpretation.

Among types of diversification development suggested were:

- A modern form of crofting focusing on local living and local housing associated with small areas for food production.
- Woodland crofts.
- Diversification and extension of existing tourist facilities and accommodation.
- Solar and other renewable technologies.

Policy support for agricultural development in addition to support for the diversification of farms, crofts and other land use businesses was also suggested.

It was argued 'diversification of existing businesses' should be expanded for introduction of new businesses to rural areas. However, concerns were raised that diversification could promote types of business that would be more sustainably located within settlements already linked by transport networks.

Comments with respect to critical infrastructure included that this should be expanded to include catchment management and flood risk management. There were also requests to emphasise the importance of transmission infrastructure and to include housing as critical infrastructure, the latter on the premise that there is less justification for infrastructure in rural areas in the absence of housing and a local population to use it.

Community hubs were seen as providing important facilities for local employment, transfer of ideas and community activities and avoiding the need for longer distance travel to access services. Addition of a reference to live/work units was suggested. However, caution was also suggested that 'small scale developments that support new ways of working such as remote working, homeworking and community hubs' could essentially be housing in the countryside.

Support for development to improve or restore the natural environment was welcomed, although it was argued that such development should require that a high level of biodiversity is achieved. It was also suggested that improvement or restoration of the historic environment should be added.

e) Proposals for new homes in rural areas outwith existing rural settlements

Some respondents argued policies at 31(e) and (f) are too conditional and limiting to make a significant impact on rural populations. However, it was also suggested that criteria could be more prescriptive in parts. There were requests for definitions of 'accessible areas' and 'areas of pressure'.

With respect to living at or near a place of work, it was suggested there should be consideration of nearby existing suitable accommodation in the first instance. It was also argued that living at or near a place of work is desirable in reducing travel and

associated emissions, and that 'essential need' should be redefined to assess the degree to which a new home will facilitate the adoption of a low-carbon lifestyle.

There was support for the development of a home for the retirement succession of a viable farm, although it was suggested there should be a requirement to demonstrate that there is no suitable accommodation for a retiring farmer within a settlement before considering a new dwellinghouse in the countryside. There was also a view that more than one property should be permitted, and that retirement from other types of rural businesses should also be included. Clarification of the intention of these points was also sought, as was an indication of what provision can be made to stop houses for retirement succession subsequently being sold off on the open market.

It was argued that the subdivision of an existing dwelling should only be supported where it can be appropriately situated, and does not result in impacts on neighbouring properties in terms of amenity, sufficient garden ground, access and parking. It was also suggested limits might be added – for example with respect to how many subdivisions would be acceptable.

Similar issues were raised as at 31(c) with respect to historic environment assets, although why this section uses the term 'cultural heritage asset' was queried.

With respect to reuse of redundant or disused buildings it was suggested that clarification on when buildings are considered to be redundant is needed. There was a view that modern agricultural buildings should be excluded since such a building could be erected quickly to create an opportunity for a home in its place. It was also suggested that the permitted development rights which would apply to many proposals for homes in the countryside should be referenced to highlight that planning may not always have a role to play in such developments.

The implication of the text as drafted that the reuse of redundant or disused buildings in accessible or pressured areas would not be supported was queried, since this could be the most sustainable use of such buildings.

f) Development proposals in accessible or pressured rural areas

Comments on 31(f) included that, as drafted, this policy would mean most rural development is conditional on the use of public transport. It was argued both that this is not realistic, and that increased working from home and improved digital infrastructure are already contributing to the sustainability of living in rural areas. While car use will inevitably be higher in rural areas, it was suggested providing new homes can help to sustain and grow local services and create greater economic justification for the funding of public transport. It was also observed that no detail is provided with respect to how local authorities determine which developments do and do not lead to unsustainable growth in long-distance car-based commuting.

Other points included that:

- Community priorities, such as lack of affordable housing in pressured rural areas, should be reflected in development that is supported.
- As drafted the policy does not allow for any windfall housing development within accessible or pressured areas, which is more restrictive than Policy 29 (Urban edges and the greenbelt).
- Restricting development which may encourage long-distance car use, could have the unintended consequence of limiting tourism development.

g) Development proposals in remote rural areas, where new development can often help to sustain fragile communities

Definitions of 'remote rural areas' and 'sustainable development' were requested. It was also suggested that 31(g) should be amended to reference repopulating communities and building community wealth.

Other points raised included that:

- There should be explicit reference to crofting and creation of new crofts since crofting has a record of supporting and sustaining fragile and dispersed communities.
- There should be a reference to self and custom build or co-housing.
- It is unclear what is meant by 'addressing issues of location' etc. and how this policy would be able to maintain consistency of patterns of development that form the character of rural areas.

h) Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use

General points on 31(h) included that this section could be moved to Policy 33 (Soils) or that prime agricultural land should be a standalone policy. Whether a proposed development on agricultural land in a predominantly urban area would be exempt from this policy was queried. It was also suggested that it would be helpful to clarify and provide examples of what might be defined as 'land of lesser quality that is culturally or locally important for primary use'. The phrase was seen as entirely open to interpretation. Some respondents thought that that it will be difficult for rural areas that have no prime agricultural land to argue that a particular piece of land has sufficient cultural or local significance to prevent development.

Also with respect to terminology it was suggested that most areas in Scotland have been mapped according to the James Hutton Institute soil type classification and, to be consistent with this, it would be preferable to reference 'good quality agricultural land' rather than 'land of lesser quality that is culturally or locally important for primary use'. With reference to the final bullet, a definition of 'good quality land' was requested.

Some respondents expressed concern that the policy does not do enough to protect agricultural land, or that the exceptions may be exploited as loopholes,

resulting in gradual attrition of an important resource. It was suggested that the absence of agriculture and forestry from the planning process leads to an imbalance between land uses, and that an all-inclusive approach to land use planning is needed to ensure agriculture and forestry are valued alongside planning for other land uses. The need to ensure linkages across other policy areas was highlighted, including with respect to Good Food Nation legislation, and it was suggested 31(h) could usefully reference food security. It was also noted that areas of 'good quality' agricultural land have significant capacity to contribute to food security.

There was a suggestion that the definition of 'prime agricultural land' should be judged in the context of the local area, and in relation to the available supply in that area, rather than in a national context.

With respect to the exception for essential infrastructure, there was a request that this should be defined and that what is a 'suitable' site should be clarified. Some respondents argued that housing should be recognised as essential infrastructure and allowed on this basis, with the proviso that there should be an established need and no suitable and available brownfield or non-prime agricultural land in the local area. An additional bullet that permits support for allocation of prime agricultural land to reflect an identified development need was suggested. It was also suggested that use of prime agricultural land for development should take account of the local context and whether the loss could be offset by the wider social and economic benefits of redevelopment. There was also a view that agricultural land should never be used for housing development.

Points on generation of renewable energy or the extraction of minerals included that these are very separate issues that should not be in the same bullet. With respect to generation of renewable energy it was suggested the bullet should be expanded to include transmission and storage of energy from a renewable source. The potential for agrivoltaics - installations designed to the maximise the production of renewable energy and food from the same land – was also highlighted. However, it was noted that the reference to generation of renewable energy only in the context of prime agricultural land, leaves a policy gap for sites not located within prime agricultural land. There was also a view that prime agricultural land should not be used for renewable energy development but should produce food to enable the UK to become more self-sufficient. It was noted that as wind energy development is currently built 'in perpetuity' prime agricultural land would never be returned to its former status.

Clarity was also requested that the final section of 31(h) that refers to demonstrating that the layout and design of the proposal minimises the amount of good quality land that is required as far as possible, is in addition to use complying with the earlier bullets.

Policy 32: Natural places

We want to protect and restore natural places.

Question 50 – Do you agree that this policy will protect and restore natural places?

Around 320 respondents commented at Question 50. In terms of an overall balance of opinion, respondents were relatively evenly divided between those who broadly supported the policy and those who sought extensive changes.

Many respondents supported the wording of the introductory text that acknowledges the importance of the natural environment and the need to restore, protect and enhance Scotland's natural assets. However, it was also argued that the policy as drafted does little to improve on protections provided by NPF3 or to indicate how restoration or enhancement of natural places will be achieved. There were calls for:

- Greater focus on protecting all biodiversity, not just designated sites.
- Greater emphasis on avoiding harm and following the mitigation hierarchy.
- Stronger, plan-led action.
- Investment in data gathering and development of reliable indicators to help produce a more complete national picture of biodiversity.

With respect to the relationship between Policy 32 and other parts of the draft NPF4 comments included that:

- The fit with Policy 3 (Nature crisis) is unclear and that there are significant inconsistencies with Policy 19 (Green energy).
- It will be important to cross reference Policy 3 which contains proposals to extend nature networks and deliver positive effects for biodiversity.
- As well as Policy 3, Policy 32 should reference those relating to quality of place, blue green infrastructure and vacant and derelict land.

Why a policy as important as this is positioned so far through NPF4 was queried.

There were also calls for linkages to be made between this policy and the Biodiversity Strategy; the Natural Environment Bill; and Government guidance on environmental principles in the European Union (Continuity)(Scotland) Act 2021.

Other subjects that respondents suggested should be included were:

- Reference to marine and coastal natural places and relevant policies within the National Marine Plan and regional marine plans.
- Improved landscape protection.
- Geodiversity.
- The role of a circular bioeconomy as a form of nature-based solution.

- Positive effects of community-led approaches and agroecology on natural places.

a) LDPs should identify and protect locally, regionally, nationally and internationally valued natural assets, landscapes, species and habitats

Points raised with respect to 32(a) included that guidance will be required to identify the assets, landscapes, species and habitats referenced and to clarify the safeguarding that corresponds with the different levels of status. There was also a view that LBAPs and other green network strategies may be better placed than LDPs to identify and protect some natural assets at a more detailed level.

Respondents also argued that:

- Wording needs to be clearer and that ‘valued’ is an ambiguous term.
- Changing ‘valued’ to ‘designated’ would provide clarity that the policy relates to designations.
- Non-statutory sites such as nature reserves should also be protected.
- Wild land should be viewed as a nationally important natural asset.

While the commitment to establish and grow nature networks was welcomed, there were calls for greater clarity on how these will be delivered and for a strategic approach to a National Network. It was suggested Policy 32(a) should: include a requirement to identify and protect areas contributing to a nature network; set out the core components of a nature network; provide guidance on development; and incorporate policy to protect the nature network and opportunities for growth.

It was also suggested there should be a specific reference to protection of geodiversity.

b) Development proposals that would have an unacceptable impact on the natural environment including biodiversity objectives

The majority of comments here related to the need for a definition of ‘unacceptable impact’. Guidance on the assessment method and on who would make the decision was also requested. Similar points were raised with respect to clarifying ‘biodiversity objectives’.

Some respondents argued that the text should be amended so that adverse impacts on the natural environment must demonstrably outweigh the project benefits if a proposal is to be refused permission. Other suggested changes included addition of ‘...taking account of the development’s contribution to net zero targets’ or ‘...unless suitable mitigation is demonstrated and can be delivered’ at the end of the sentence.

Other points on 32(b) included that:

- More robust language should be used – ‘must’ rather than ‘should’.
- There is a risk this policy conflicts with general environmental protection under Policy 3 (Nature crisis).

- All public bodies have a legal duty to further the conservation of biodiversity and this must be reflected in this policy.

c) Development proposals likely to have a significant effect on an existing or proposed European site

It was suggested that clarity is needed on how development affecting European sites will be considered within the planning system, and that although legislation is referenced, specific legislation is not stated. A strong presumption against development that is damaging to European sites was requested. Further suggestions included:

- Addition of 'regardless of proposed mitigation'.
- Inclusion of protection of natural World Heritage Sites at either 32(c) or (d).

d) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve

Comments on 32(d) included that the language used should be strengthened, and that 'significant adverse effects' should be explained. It was also argued the protections do not go beyond current requirements and that this section lacks ambition. There were specific requests to:

- Give NSAs equal status with National Parks.
- Amend the wording to state that all European, Ramsar and SSSI sites must be identified and protected.
- Include WLAs.
- Recognise UNESCO sites such as the Galloway and Southern Ayrshire Biosphere.
- Give protection to Geological Conservation Review sites at an equivalent level to SSSIs.

However, it was also argued that rather than a blanket ban there should be some scope for mitigation to address impacts within designated landscapes; it was suggested that the text should be amended to add that the weight to be given to adverse effects will depend on the status of the receptor and the importance of the benefits. Greater flexibility was also suggested to support the delivery of critical national infrastructure, where it is evidenced that there is no suitable alternative.

It was noted that Policy 19(c) only references National Parks and NSAs as areas where proposals for wind farms should not be supported.

e) Development proposals that would be likely to have an adverse effect on a protected species

It was noted that although Policy 32(e) refers to protected species, it is not clear what these are or what legislation is being referred to, and there is no explanation of the 'relevant statutory tests'. Some accompanying text to explain the level of protection provided by the legislation was suggested.

Other suggestions included that:

- The text should be strengthened to provide greater detail for decision makers, to ensure the importance of protected species is considered as early as possible in design, as well as the obligation on developers to provide sufficient information and carry out survey work.
- Protection should be extended to vulnerable species or should apply to noteworthy species, from internationally red listed through to locally important.
- It should cover species that have been present at a site to avoid any incentive to remove a species before application.

A different perspective was that a more nuanced approach is required that allows decision makers to consider significance, acceptability and the extent to which a proposal will help address the global climate emergency. It was also argued that the policy wording should make clear that adverse effects on protected species should be assessed at the population level.

f) Where non-native species are present on a site developers should take into account legislation on non-native species

Comments on Policy 32(f) included that, as this clause is required by law, it may not be necessary to repeat it within NPF4. It was also argued that that the legislation should be signposted, and that the requirement should be to abide by legislation not take it 'into account'. Other points include that:

- The reference should be to 'invasive' non-native species.
- As drafted the policy lacks detail and provides no clear direction or advice.
- A preference for the use of native species of a local provenance wherever possible should be included.

There was also a call to amend 32(f) to reflect risks posed by non-native conifers, which are exempt from the definition but can cause significant issues through self-seeding.

g) Development proposals that affect a site designated as a Local Nature Conservation Site or a Local Landscape Area

Some respondents welcomed 32(g) as allowing planning balance and weighting to be applied on a case-by-case basis, although it was suggested that the failure to differentiate between the weight that should be afforded to effects on nationally and internationally designated assets compared to local sites could present a barrier to directing development toward less sensitive environments.

However, other respondents raised concerns, including that, that as drafted, 32(g) provides insufficient protection for LNCSS and that, over time, the biodiversity value and importance of these local designations will be diminished.

It was argued that any provision of benefit can be deemed locally important and that the phrase 'should be supported' can be seen as an emphasis in favour of

development. Several forms of amended wording were proposed to strengthen protection of LNCSs including that development proposals:

- Will 'only be acceptable if in compliance with policy criteria'.
- 'Will not be supported where they would have adverse effects on the integrity of the area or the qualities for which it has been identified unless it has been demonstrated that the mitigation hierarchy has been followed and any such residual effects are clearly outweighed by social, environmental or economic benefits of local importance'.

h) Planning authorities should apply the precautionary principle

Comments on application of the precautionary principle included that this is welcome, although also that its inclusion in previous planning policy has not always prevented approval of development that resulted in damage to designated areas. Stronger wording was sought to encourage planning authorities to apply the precautionary principle more frequently than at present.

Specific suggestions included that:

- There should be a strong presumption against development where impacts on nationally or internationally significant landscapes or natural heritage assets are uncertain.
- The principle should be applied to all natural heritage assets, not just to those of national or international significance.
- It should also apply to historic environment assets.

It was also suggested that the text should be amended to remove the reference to landscape, since it will always be possible to assess landscape impacts.

However, concerns were raised that the text as drafted could lead to disagreements on the likelihood of damage or on requirements for additional research to reduce uncertainty. It was argued that requirements must be proportionate to the potential impact, and that the wording contained within current SPP should be retained.

Specific concerns were raised with respect to potential impacts of the policy as drafted on:

- Critical national infrastructure.
- Finfish developers.

With respect to the latter, it was suggested that the text is of particular concern to salmon aquaculture since it relates to potential impacts which currently do not have an appropriate metric of evaluation. It was argued that planning determinations for salmon farming should be based on scientific rigour, rather than 'sound evidence'.

j) Development proposals in areas identified as wild land

Some respondents expressed strong views with respect to development in WLAs, often tending to one of two very different positions:

- Support for a presumption against development on wild land, or a view that the text as drafted should be strengthened further.
- Concern that the text as drafted will effectively embargo development in WLAs, with negative impacts for both wind energy development and for the rights of rural dwellers to local housing and sustainable development.

Some respondents who sought to increase protection for WLAs argued that the phrase 'cannot be reasonably located outside of the wild land area' is open to differing interpretations, with suggestions that: LDPs should protect WLAs; WLAs should be added to the list of nationally important natural assets; and that wild land should become a statutory designation. A recent report was said to have found that the rate of loss of wild land appears to be increasing as the scale of development has increased. There were also calls to consider the impact of major developments on landscape quality immediately adjacent to the boundaries of WLAs and to create buffer zones in which development should not be permitted, if this would affect the landscape or wild quality of land within the WLA.

Respondents who were concerned by the extent to which development in WLAs could be restricted argued that the requirement that development 'cannot be reasonably located outside of the wild land area' imposes a sequential test that will be impossible to satisfy, thus amounting to a *de facto* ban on commercial scale wind energy development in WLAs or preventing meaningful repopulation proposals in these areas. It was argued that Policy 32(i) undermines Policy 19(d), and represents a significant barrier to the level of onshore wind deployment aspired to in the draft Onshore Wind Policy Statement and, by extension, to meeting legally binding emission reduction targets. It was also noted to represent a fundamental change from the policy approach in current SPP paragraph 215 which states that 'in areas of wild land, development may be appropriate in some circumstances'.

Respondents expressing concerns with respect to the limitations imposed by 32(i) suggested:

- Section 32(i) should be removed entirely.
- The policy should be rebalanced to ensure onshore wind proposals can be acceptable in WLAs, subject to an assessment showing how the effects on the qualities of the areas have been mitigated through design. Further guidance could be provided around developments that create minimal or positive impacts and NPF4 should recognise that renewable energy development and peatland restoration are compatible. Greater support should be provided for the delivery of critical national infrastructure where no other option is viable or suitable.
- Section 32(i) should give significant weight in the planning balance to the extent to which a proposed development would provide benefits in terms of the Climate Emergency and the 2030 interim and 2045 Net Zero targets.

- Criteria relating to wild land and landscape should explicitly state that they only apply to development proposals within WLAs.
- WLA boundaries should be revisited with a view to reducing their geographical coverage.
- Policy should not preclude resettlement of WLAs for example through creation of new crofts.
- The requirement for 'a site-based assessment of any significant effects on the qualities of the areas is undertaken' should not be a barrier against a rural family keen to initiate a self-build project.

Policy 33: Peat and carbon rich soils

We want to protect carbon rich soils and preserve and restore peat.

Question 51 – Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

Around 230 respondents made a comment at Question 51.

There was broad support for Policy 33 and those who did not think it will meet the desired objectives tended to think the policy should go further in protecting peatlands. A small number of respondents set out detailed suggestions for amendment to the policy as drafted.

General comments included that Policy 33 should cross reference related NPF4 policies including Policies 2 (Climate emergency) 3, (Nature crisis) and 34 (Trees, woodland and forestry). It was suggested that at present, Policy 33 does not comfortably align with Policies 2 and 3 due to the intrinsic loss of carbon and biodiversity that occurs with peatland disturbance.

Some respondents highlighted aspects they considered to be missing from Policy 33 including that it should be strengthened in terms of peatland restoration and that, as drafted, there is no information on restoration of peatlands that are not the subject of development interest. It was argued that a proactive approach to restoration should be adopted and that landowners should be encouraged to undertake peatland restoration (and to apply for available grants to aid carbon sequestration efforts).

It was also noted that the policy largely concerns peatland and makes little reference to other carbon rich soils. It was argued there should be greater emphasis on other soils and on other ecologically important habitats including grasslands. Protection of prime agricultural land under this policy was also suggested.

Definitions of 'peatland' and 'carbon rich soils' were requested, with a suggestion that a report 'Carbon-rich soils, deep peat, and priority peatland habitat - Expert views on project level assessment', commissioned by Natural Power should be

used to clarify how peat, peatlands and carbon rich soils are defined within NPF4. The importance of a consistent approach was highlighted.

Other topics respondents suggested should be covered under Policy 33 included:

- Protection of carbon rich soil, and deep peat in particular, from tree planting and rectifying the effects of historical forestry plantation on peatland.
- Reference to the archaeological value of peat and carbon rich soils and to the importance of assessment and mitigation of effects on the historic environment.
- Handling of soils during construction.

a) LDPs should protect locally, regionally, nationally and internationally valued soils

Respondents who commented on Policy 33(a) often agreed that LDPs should protect valued soils. There were calls to define 'valued soils', including in an international context. How the soils listed would be identified was queried, including whether there is existing mapping, whether local authorities would be expected to identify such soils to inform LDPs, or whether the value of a soil would be determined at the time of a planning application. It was also suggested that it would be more useful to refer to all soils, as all soils have value.

b) Minimise disturbance to soils on undeveloped land and protect them from damage including erosion or compaction

It was suggested that the wording of this section is unclear, including in terms of the type of soils covered, and that it also requires clarification and guidance on how damage would be assessed and by whom. Following the mitigation hierarchy was proposed, such that development proposals are supported only if they are designed in a way that avoids disturbance to soils on undeveloped land and protects them from damage, including erosion or compaction.

c) Development on peatland, carbon rich soils and priority peatland habitat

Some respondents expressed significant concerns with respect to 33(c), calling for the language to be strengthened. It was argued that, as drafted, there are too many exceptions, too many loopholes, or too much leeway for developers. There were concerns that the cumulative impact of development could be significant, and that the exceptions could undermine the effectiveness of this policy in protecting peatlands. It was suggested that if climate recovery is to be a key principle of NPF4, protection of carbon rich soils and peatlands must be a priority, and that peatlands should receive the same level of protection as afforded to ancient woodlands, native woodlands and hedgerows by Policy 34.

Other respondents welcomed the absence of a blanket ban on development, or saw the criteria listed as offering a balance of land use, taking account of the needs of agriculture, rural communities and peatland restoration. A small number of 'Local Authority' respondents argued that development must not be precluded in areas with a high proportion of carbon rich soils. It was suggested that the approach should be proportionate, taking account of the prevalence of carbon rich soil and

the scale of proposed development, with LDPs identifying where development is acceptable. A statement of hierarchy that could drive development to areas of lower value carbon rich soils was also suggested.

With respect to the proposed exception for essential infrastructure, comments included that the definition in the Glossary appears to apply only 'in a flood risk area for operational reasons' and that this should be clarified. It was suggested that the text should be modified to read '...unless for essential infrastructure, including transmission and distribution infrastructure, where there is a locational need.' Guidance was also sought on whether housing is regarded as essential infrastructure.

Comments on the exception for generation of energy from a renewable source included that developers should avoid peat where possible, and that deep peat should be safeguarded from new development.

Other respondents welcomed recognition that generation of energy from a renewable source on peatland can be supported, with several 'Energy-related supplier, developer, association or body' respondents arguing that there should be greater recognition that renewable energy projects provide an opportunity to restore peatland and improve other carbon rich soils. Some of these respondents also referenced their own peatland restoration projects or peatland management work. It was suggested that many peatland environments have been modified by human activity and that a large percentage of Scottish peatland is degraded to some extent.

Some respondents argued that there will need to be clear guidance on what is acceptable under a particular exception and on how decision makers assess what are acceptable impacts on peat.

A detailed site specific assessment

Policy 19(c) specifies that a detailed, site specific assessment will be required to identify depth, quality and stability of soil and the effects of the development on peatland, including the likely effects of development on CO₂ emissions. A range of queries were raised about how this should be carried out and who should assess the results.

In terms of an assessment method, it was suggested that the policy should specify that this should be 'in accordance with the Scottish Government/SNH/SEPA Peatland Survey Guidance (2017) or updated national guidance'. It was argued that there should be a requirement to use the SNH Carbon and Peatland map to guide developers away from the most sensitive sites. The burden that the requirement for detailed site assessment could place on small scale development in fragile rural communities was also highlighted, with a suggestion that a sense of proportionality and scale should be applied.

Several respondents noted that the policy makes no reference to the carbon calculator that is currently used in the assessment of windfarms of 50MW and above. While there was recognition that the carbon calculator needs to be updated,

it was argued that its use would strengthen the policy. In the absence of accurate carbon assessments it was argued that there should be a policy presumption against development at a site or, specifically, that large-scale development proposed on deep peat should be refused planning consent.

The importance of monitoring and measuring the impact of development on peatlands was also highlighted.

d) Development proposals for new commercial peat extraction, including extensions to existing sites

Some respondents took a view that there should be no commercial peat extraction and no exemptions, or expressed concerns at the number of exemptions proposed. Others argued that the policy is not specific enough and will leave potential loopholes to allow peat extraction. There was a call for local authorities to be required to review all existing permissions and to end extraction on existing sites as soon as possible, ensuring that sites are restored in line with the requirements of the original permission.

Specific concerns were raised with respect to the proposed exception for peat extraction to support 'an industry of national importance to Scotland'. It was suggested that this should be clarified, or that detail should be provided on how 'national importance' would be determined and that examples might be given. It was also suggested that if this provision is intended to be for the benefit of the whisky industry, the policy should say so, to avoid ambiguity. It was proposed that any permission for peat extraction granted to a particular industry should be subject to conditions, including a requirement to demonstrate that they have taken steps to identify a 'reasonable substitute', and a stipulation that precludes peat being used for other purposes, including export.

It was also argued that extraction of peat for horticulture should never be supported, and that the horticultural peat industry should not be considered of national importance.

Other points on peat extraction included a number of comments on the requirements that a residual depth of peat of no less than one metre should be retained across the whole site. It was argued that:

- Leaving a depth of over 1m across an extraction site may not guarantee successful restoration of bog habitat and that this requirement should be revisited.
- The requirement to retain a residual depth of no less than 1m across the site would cause some sites used by the whisky industry to be undevelopable in future, potentially leading to requests to extract peat from sites that are in better condition and with greater capacity to store and assimilate carbon.

Policy 34: Trees, woodland and forestry

We want to expand woodland cover and protect existing woodland.

Question 52 – Do you agree that this policy will expand woodland cover and protect existing woodland?

Around 275 respondents¹ made a comment at Question 52 and a further 1,481 respondents supported a Woodland Trust petition seeking strengthening of the language at 34(b).

In terms of an overall balance of opinion, a majority of responses expressed support for the policy.

General comments included both support for inclusion of this policy and that its acknowledgement of the importance of trees and woodland in meeting climate targets and reversing biodiversity loss is welcome. It was also suggested that the protections provided could be strengthened further, and the importance of preserving native woodland was emphasised. There was also a view that that the policy could be more ambitious in terms of proactively encouraging woodland expansion or could reference the Scottish Government's woodland planting targets.

Alternative perspectives were also expressed, including views that:

- The proposed protections go too far in protecting woodland at the expense of development needed to deliver net zero. It will be increasingly important that windfarms can be constructed in forested areas as the percentage of tree cover increases and that there is no reference to development within commercial forestry and woodland.
- Development that could have biodiversity net gain may be restricted.
- Since Scotland's native woodlands have been in decline for several thousand years, it can be argued that the natural vegetation type for much of the Highlands is now open moorland and bog with disjunct woodland and that this habitat could be fragmented by tree planting.

Respondents also highlighted a range of issues they felt are missing from the policy or should have a greater focus including:

- The importance of urban trees. It was noted that individual trees and groups of trees in urban areas can have a great impact on many peoples' daily lives.
- Protection for individual trees or groups that do not form part of a wider woodland.
- Potential for food production in wooded areas and support for woodland crofts, including more flexibility for related small-scale development requiring some woodland removal.

¹ Of the 275 respondents commenting, 21 respondents drew on The Woodland Trust's petition text but also went on to make further comments.

- Recognition of the role of trees and woodland in providing timber for construction in Scotland and for sustainable forestry as part of a circular economy. It was suggested it would be beneficial to set out situations in which new forestry should be approved.
- Reference to historic environment assessments and mitigation.
- Improved forestry management for social, economic and tourism requirements.
- Reference to the social benefits of forest or the value of woodlands to local communities.
- Greater emphasis on protecting the species that benefit from woodland.
- Reference to Tree Preservation Orders (TPOs) or to preservation of trees in Conservation Areas. TPOs were reported as one of the only protections for individual trees and groups of trees in Scotland, and there was a view that removing these without any replacement could prove highly damaging.
- Tree health.
- The importance of natural regeneration.
- A focus on use of native species for woodland creation and a greater focus on delivering the right tree in the right place.
- No support for creation of new monoculture plantations, both because of their poor biodiversity and to protect peatland. Gradual replacement of existing plantations with biodiverse woodlands.
- Recognition that most woodland development and regulation is outwith the planning process.
- Guidance on tree planting in regions with large areas of peat and carbon rich soils, where planting could result in more carbon being released into the atmosphere than stored.
- Planting riverside trees to provide shade to mitigate rises in water temperature.
- Potential cross boundary implications, opportunities for collaboration and the role of Regional Spatial Strategies and RLUPs.

It was also suggested that a definition of woodland is required.

Some respondents commented on resource implications of the policy for local authorities, and others argued that resources should be provided for biodiversity and tree officers to be associated with planning departments.

a) LDPs should identify and protect existing woodland and potential for its enhancement or expansion

There was support for 34(a), although in some cases this was qualified by a requirement that expansion of woodland should be sensitive to other habitats of high diversity value, including long-established grasslands.

It was also argued that:

- 34(a) should be a policy requirement.
- There is no need to identify all woodland on the proposals map since protection is provided by this policy and that a policy framework which protects without actually identifying all relevant woodland is appropriate.
- A clearer holistic approach and mention of land use strategies could ensure effective implementation.

The reference to the 'The Right Tree in the Right Place' was welcomed although it was suggested that the document needs refreshing and could be re-badged as 'The Right Woodland' rather than 'The Right Tree'.

A number of points were raised in relation to Forestry and Woodland Strategies (FWS) including that the relationship between the requirement set out in 35(a) and the statutory requirement in relation to FWS needs to be clarified. It was also argued that the expansion of woodland and protection of existing trees is outwith the remit of FWS, and that planning authorities should develop targets using more progressive global metrics such as Tree Canopy Cover, or that it would be more appropriate to identify new woodland priorities as a form of opportunity mapping.

b) When development proposals should not be supported

The wording of 34(b) was seen as improving the protection afforded by current SPP, although there was also a call to strengthen this further by stating that development proposals must not be supported in the situations specified. A different perspective was that the proposals are too restrictive or disproportionate, and that blanket protection fails to allow negative impacts to be balanced with the benefits of a development. It was suggested that there should be reference to mitigation or to exceptional circumstances that might allow proposals to be supported.

It was also argued that 34(b) could be seen to imply that 'every day' trees not covered by the specified protections are not of value and that the description of trees and woodland considered important and to be protected, needs to be expanded to reflect the role that trees of local importance play in the environment.

Any loss of ancient woodlands, ancient and veteran trees or adverse impact on their ecological condition

This provision was welcomed, and it was argued that to allow compliance with the policy it will be important to update the Ancient Woodland Inventory and to provide an ancient and veteran tree inventory, such as that created by the Woodland Trust.

Other issues raised included that consideration should be given not only to the trees and their age, but also to the historical use and quality of the land itself. The particular importance of preserving ancient semi-natural woodland and Scotland's rainforest were highlighted.

However, it was also argued that the policy bar of ‘any loss’ is too high and that, rather than a specific exception, ancient woodland should be treated in the same way as native woodland in the second bullet.

It was also suggested that ‘adverse impacts’ should be defined.

Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value

It was suggested that landscape value should also be referenced in this context.

It was also argued that this provision is too stringent since it fails to recognise the possibility of mitigation and will make it very difficult for any projects to be supported, even if the impacts are only very minor. It was suggested 34(b) should be rephrased to ‘impacts should be reduced as far as practicable’.

Fragmenting or severing woodland habitats unless mitigation measures are identified and implemented

It was argued that this section should be strengthened since the damaging effects of habitat fragmentation are well understood, and also that the policy should make clear that, in line with the mitigation hierarchy, fragmentation and severing of woodland habitats should be avoided, before any mitigation is considered.

c) Development proposals involving woodland removal

The most frequent comment on 34(c) was that this requirement should be compulsory. It was also suggested that:

- The reference should be to trees rather than woodland.
- The text could be strengthened in various respects, including by adding ‘and where the development could not be located elsewhere or designed to avoid woodland removal’ at the end of the first sentence, or by turning the sentence around to read that a development proposal ‘should not be supported unless it would achieve significant and clearly defined additional public benefits...’.
- Greater clarity is required on the ‘additional public benefits’ which might justify removal. It was argued both that the benefits should include social benefits for the local community as well as environmental benefits, and that housing should be explicitly excluded.
- There should be a presumption in favour of retention, and acceptable proposals should be handled by exception.

With respect to compensatory planting, some respondents argued that ‘generally’ should be removed so that such planting is always ‘expected’, or that clarification on situations where woodland removal does not require compensatory planting are needed. It was also suggested that there are circumstances where compensatory planting may not be the most appropriate action – for example where peatlands were previously planted with commercial forestry and restoration to healthy functioning peatland has greater benefits than re-planting woodland.

There was a query as to how compensatory planting will take into account the age, condition and habitat provided by the original woodland, including the carbon stocks held in vegetation and soils, and that more emphasis could be given to potential enhancement in compensatory planting proposals. A specific suggestion was that standard practice should require that three trees are planted for every one removed. It was also argued that the emphasis on protecting native woodland is crucial because it is very difficult, if not impossible to recreate the ecology of native woodland, and that it takes many years for replacement trees to be an effective carbon store.

Some respondents suggested that there should be a reference to the Scottish Government's Policy on Control of Woodland Removal, although also that this requires updating to reflect understanding of the impacts of climate change, biodiversity loss and the land reform and community empowerment agendas. On the last issue it was argued that it is currently very challenging for a community to make even very small areas available for forest buildings or woodland crofts and that the cost implication of compensatory planting may make it impractical for communities.

Some respondents argued parts (b) and (c) of the policy should be more closely aligned.

d) Existing woodland or land identified as being suitable for woodland creation

Suggestions for strengthening the text at 34(d) included:

- Requiring all developments to integrate new woodlands into their design, not just those that include areas identified as being suitable for woodland under Forest and Woodland Strategies.
- Opportunities should be 'prioritised' rather than 'considered'.

It was also proposed that this section should reference the need to consider the impact on local communities and economies of afforestation and woodland creation proposals, and that replanting must not have unintended consequences on those living and working in an area.

e) Sustainably managed woodland

Points raised with respect to 34(e) included that, as drafted, the policy appears to state that a development proposal should be approved if it provides sustainable woodland: clarification that this would be subject to complying with other policies was requested. It was also suggested this section could be expanded to include a reference to active management of woodlands through planning obligations and management agreements. The absence of any reference to non-woodland trees was seen as a missed opportunity.

It was also suggested that parts (d) and (e) could be combined, or that the statement that 'planning applications should be supported where they enhance, expand and improve woodland...' would be better moved to the beginning of part (d).

Policy 35: Coasts

We want to help our coastal areas adapt to climate change and to support the sustainable development of coastal communities.

Question 53 – Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

Around 170 respondents made a comment at Question 35.

Respondents tended to support the policy, although concerns were raised with respect to some of the topics that are not covered in the text as drafted.

It was suggested that the introductory section of the policy should place more emphasis on the immediate and short-term climate change risks at the coast, or that it should reference strategic and local transport points/nodes and the important role of ports and harbours. Creation of an additional, dedicated ports policy was also proposed.

Other general comments included that it is not clear how Policy 35 relates to other policies that will be relevant in coastal locations - such as Policy 31 (Rural places) Policy 8 (Infrastructure first) and Policy 19 (Green energy).

Among other elements that respondents thought the policy should include were:

- Wider and earlier acknowledgement in the document of other relevant plans including: National and Regional Marine Plans; Dynamic Coast and Coastal Change Adaptation Plans; Shoreline Management Plans; Coastal Character Assessments; and the Future Fisheries Management Strategy.
- A greater focus on protecting the marine environment and on protecting and restoring blue carbon habitats as a nature-based solution. Recognition of the role of coastal habitats as carbon sinks, and of their high biodiversity value and susceptibility to fragmentation.
- A greater focus on communities – including creating and supporting sustainable coastal communities. Support for such communities in the form of being a national development priority and new funding for measures to adapt to climate change.
- Recognition of the landscape and recreation value of the coast and the role of beaches and foreshore in providing recreational, amenity, play and health benefits. The importance of the coast to Scottish tourism.
- Action to reduce coastal litter.
- Protection of public access to and along the coast.
- Reference to access and connectivity challenges for coastal communities and risks to coastal transport infrastructure.
- Protecting existing settlements, managed coastal retreat or the concept of 'coastal roll-back'.

- Permitting a landowner to implement coastal defences, at their own cost and subject to satisfying appropriate criteria.
- Reference to historic environment assessments and mitigation.
- Support for renewable energy including onshore coastal infrastructure associated with offshore wind development and reference to the economic potential of renewable energy development in coastal areas.
- Protection for other coastal industries such as fishing and tourism from negative impacts of offshore wind.

There were also calls for definitions of ‘coastal location’ and ‘coastal area’ and for clarification with respect to:

- The nature-based solutions which are referred to throughout the policy.
- Areas where the policy applies, for example whether along inland firths. Reference to ‘coasts and estuarine environments’ throughout the policy was also suggested.

a) LDP spatial strategies should consider how to adapt coastlines to the impacts of climate change

Comments on 35(a) included that this is not a development management criterion, or that it seems beyond the remit of LDPs. It was also thought unclear if LDP spatial strategies are required to identify developed and undeveloped coast or whether this would be assessed on a case-by-case basis with reference to guidance. Other suggestions included that:

- This section should reference the Dynamic Coast Project and the Coastal Change Adaptation Planning process and should take account of relevant Shoreline Management Plans. The importance of regional working was also highlighted.
- Climate-related increase in the extent and rate of coastal erosion should be acknowledged.
- It would be helpful to clarify how the policy would apply to areas which are already, or likely to become, at flood risk, and how adaptation measures would be addressed through the planning system.
- Language around nature-based solutions should be strengthened to direct planning authorities to use nature-based solutions where possible. However, proposed nature-based solutions could impact the historic environment and mitigation must be considered.
- There should be a presumption in favour of development which is required for economic sustainability to support reduction in emissions and global resilience, including sustainable port development.

b) Development proposals that require a coastal location should be supported in areas of developed shoreline

It was suggested that greater clarity is needed as to what ‘require’ a coastal location means, and whether developers should have to demonstrate that a coastal

location is required. Explanation of what is meant by 'developed shoreline' and 'coastal protection measures' was also requested. Other suggestions with respect to 35(b) included that:

- It should state that development proposals that require a coastal location should be supported in areas of developed shoreline, with a separate policy strand to address development resulting in increased coastal erosion and/or flood risk.
- As drafted, the developed shoreline concept could prevent growth of a community unless not at risk and not dependent upon new coastal protection measures.
- The need for further coastal protection measures should not preclude development of the developed shoreline where the risk to people of coastal flooding or coastal erosion is not increased.
- The policy is too restrictive and should be amended to enable certain development where it is considered necessary or essential.
- The requirement for development not to 'result in the need for further coastal protection measures' should be clarified. It should not apply directly to mitigation features embedded within development proposals.
- The reference to development with 'a very short lifespan' at 35(c) could be mirrored at 35(b).
- A balance needs to be struck between directing development proposals to already developed shorelines and maintaining the character of coastal communities.

c) Development proposals in undeveloped coastal areas

Points in relation to 35(c) included that the language needs to be strengthened to use 'must' rather than 'should'. A definition of 'undeveloped coastal areas' was requested, as was making a clear distinction between undeveloped coastal areas and settlements that are located in coastal areas.

Other issues raised included that caveats in relation to the blue economy, net zero and community regeneration will need to be clarified to assist decision makers. The possibility that these caveats may be too broad was highlighted, particularly with respect to 'economic regeneration or wellbeing of communities' and it was argued that they could undermine the intention to support development in previously developed areas. A suggested alternative was replacing 'or' with 'and', so that a proposal would only be supported if 'necessary to support the blue economy, net zero emissions *and* if it would contribute to the economic regeneration and wellbeing of communities, etc.' It was also suggested that the policy should recognise that undeveloped coastal areas will rarely be an appropriate location for new development, and that there should be a stronger presumption against development in such areas.

Further points on 35(c) included that:

- The list of developments that could be supported should include works to increase climate change resilience and biodiversity enhancements/conservation.
- Developers could be required to justify why development is required in an undeveloped coastal area.
- Clarity is needed with respect to how sea level rise, flood risk or erosion should be factored into consideration of development at the undeveloped coast.

With respect to the second paragraph in this section, there was a view that supporting development 'with a very short lifespan' is not a sustainable approach since it makes it more difficult to refuse similar development on the same site in future. It does not encourage an environmentally sustainable approach to the use of construction materials. It was also suggested that there could be a requirement for development proposals with a short lifespan to detail subsequent restoration or removal.

d) Development proposals for coastal defence measures

With respect to 35(d) there was a request to make clear whether all of the bullet points need to be satisfied. It was also suggested that a net zero assessment should be part of any appraisal since current hard defence measures are typically high in embodied carbon.

Other issues raised included that:

- Local Flood Risk Management Strategies and Plans should be included in the list of documents with which a proposal should be consistent.
- Examples could be provided – both of nature-based solutions and the evidence needed to demonstrate that hard defence measures are necessary.
- 'Essential assets' could be defined and there could be a requirement to evaluate moving such assets.

e) Long-term coastal vulnerability and resilience

Several comments on 35(e) referenced what was seen as a lack of clarity of language, with the terms 'may impact on the coast', 'appropriate issues' and 'long-term vulnerability' all thought too vague. Clarification or guidance was also requested with respect to:

- How it is intended that this policy is met, when it would apply, and the issues that should be considered?
- How it would be assessed?
- How this requirement interacts with the rest of the policy?

Part 4 – Delivering Our Spatial Strategy

Delivering our strategy and realising our collective ambitions requires collaborative action from the public and private sectors and wider communities. Actions will range across different scales and include a mix of strategic and project investments. It will be important to focus implementation and monitoring on delivering strategic actions and key developments.

Question 54 – Do you agree with our proposed priorities for the delivery of the spatial strategy?

Question 55 – Do you have any other comments on the delivery of the spatial strategy?

Around 350 respondents made a comment at one or both of Questions 54 and 55. A single analysis of themes raised across these two questions is presented below.

General comments in support of the proposed priorities included that they represent a pragmatic approach to securing and prioritising sufficient resources to ensure delivery of the spatial strategy priorities and proposed national developments. However, it was also suggested that the proposed priorities are not clear, or that Part 4 is probably the weakest section of the draft NPF4. A connected concern was that it is short on detail and does not give confidence around moving forward with what is a very ambitious strategy.

It was suggested that there are a number of different components to effective delivery, not all of which are captured within the current draft NPF4. There was reference to: good practice delivery approaches; the consistent and rigorous translation of NPF4 policy to Regional Spatial Strategies and LDPs; policy alignment and delivery questions raised by the individual proposed policies; and ongoing delivery and oversight of NPF4.

A number of respondents commented that a delivery plan would have been helpful to support the draft NPF4. The importance of the delivery strategy was highlighted, including to provide confidence to all sectors involved in the built environment and to demonstrate that the relevant actions, mechanisms, and responsibilities are clear. There were also references to the need for clarity over: the timetable and milestones; resourcing; staff capacity; oversight; how policy tensions may be addressed; partnerships; cross-sectoral working; and the expectations of all parties in delivering the spatial strategy.

The absence of a delivery plan was described as disappointing, especially when local authorities are required to publish a delivery programme alongside their proposed LDPs. Associated comments included that without a proposed delivery plan or programme it is difficult to comment on the proposed priorities that have been set out and to understand:

- The Scottish Government's role in delivery when most of the spatial strategy prescriptions are regionally and locally based.

- The role that the LDP Regulations consultation plays in the delivery programme for NPF4.

There was a call for a detailed delivery programme to accompany the final NPF4, with some respondents noting that they would welcome the opportunity to be involved in its development. It was suggested that the development of the delivery programme would benefit from input from a range of stakeholders and that further thought should be given to how representation from the likes of business and transport bodies can sensibly be incorporated.

In terms of its content, there was a call for the interrelationships, synergies and resource alignment requirements at the national level to be articulated; this would provide a blueprint for LDP delivery programmes, signalling to local government what is expected and required to support the long-term spatial strategy for Scotland.

Joined-up, partnership approach

Respondents welcomed recognition of the broad range of partners, including development agencies, to be involved in the delivery of the spatial strategy, and again some went on to note that they looked forward to engaging constructively in the process.

In terms of a successful partnership approach comments included that planning authorities will play an essential role in delivering NPF4, and also that it is not just about planners, but all the essential internal and external inputs from other professionals. Groups referenced included other local authority services, central government departments, key agencies, the Infrastructure Delivery Group, the Scottish Futures Trust, Scottish Enterprise and investors and developers.

With specific reference to the role of the key agencies, it was suggested that they will have a critical enabling role to play in ensuring the successful delivery of many aspects of NPF4. It was noted that this would also extend to supporting the development of a full suite of NPF4-compliant LDPs as soon as possible. There was specific reference to maximising the opportunities presented through the digital planning programme, capacity building and supporting tools and guidance.

Other comments about working together to deliver NPF4 included that:

- The pace and scale of change needed will require a culture change in how planning stakeholders work together.
- Recognition of the need to work closely with marine planning authorities at the national and regional scale as these authorities are being rolled out, is welcome.

Aligning resources

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

require clear committed leadership from the Scottish Government for national agencies to work with planning authorities, given that each authority will be working to different timescales.

However, there was a concern that the alignment of different policy frameworks and NPF4 is currently an area of weakness. Further comments included that there needs to be a focus on:

- Alignment with the Programme for Government. The role of the National Investment Plan and the Islands Connectivity Plan should also be considered.
- The hierarchy of national, regional and local policies and their interaction. It was noted that for many NPF4 policies there are a number of related government policies, and providing clarity and guidance on their role and relationship to NPF4 would be valuable.
- How future policy developments will be captured in the spatial strategy and vice versa.
- The alignment of different legislative frameworks.

In terms of key elements that will need to be considered when aligning resources, there was reference to capital and revenue resources, and to NPF4 needing to set out a clear Capital and Revenue Investment Programme. It was suggested that being clear on how the delivery programme will be resourced and enabled going forward will support both market confidence and the practical approaches to effective delivery that are needed. There were also references to the need for:

- Clarity on the respective roles and funding streams available from central government, multi-agency, private sector, and partnership arrangements.
- The delivery programme being phased and aligned with public sector expenditure plans.
- Closer alignment of NPF4 to the Infrastructure Implementation Plan to facilitate funding certainty.
- City Region Deals paving the way for a much-needed greater scale of investment.
- Engagement with investors and developers to ensure that resources are not only effectively focused but also effectively phased.

Picking up on the theme of investing in planning services (also discussed further below), it was noted that success will depend on sufficient funding and support for planning authorities. More generally, it was noted that whilst alignment of resources is important, the scale of resources required to deliver the strategy receives little mention.

The need to support communities to engage effectively was also highlighted, with resources set aside by public and private sectors to provide support to local communities to engage in a meaningful way, through the application of suitable place tools and best practice community engagement processes.

Infrastructure first

Respondents often noted their support for the principle of infrastructure first, with associated comments including that it puts climate change and sustainable development at the centre of capital planning and investment decisions and seeks to ensure the most effective use of infrastructure as possible. Reflecting themes raised in the analysis for Policy 8 (Infrastructure first), it was thought that infrastructure first should be a Universal Policy, and that a definition of the approach and the types of infrastructure it covers is required.

It was suggested that the IIP provides a useful basis for defining and developing the approach to be set out in NPF4, and that there needs to be more explicit interlinkages to the IIP. However, there was a concern that the current IIP is not due for renewal for another year which may make it challenging to deliver many elements of NPF4. An associated suggestion was the publication of an annual National Infrastructure Assessment which, if integrated with NPF4's delivery and monitoring programme, could improve ongoing understanding of national infrastructure requirements and actions necessary to support delivery.

More generally, there was a call for greater detail on the delivery of the infrastructure first approach, including the proposed Infrastructure Levy set out in the Planning (Scotland) Act 2019. It was suggested that work on the introduction of an Infrastructure Levy is crucial and that the lack of clarity on funding needs to be addressed.

In terms of delivering the infrastructure first approach, it was suggested that there needs to be:

- A robust structure for early stakeholder engagement. It was suggested that transparency and collaboration from all stakeholders at all stages will be important.
- A clear financial strategy for front funding and cost recovery. It was suggested that very often the quantum of infrastructure funding required can only be provided by the Scottish Government and that the funding criteria for this needs to be set out.
- Recognition of the role of LDP delivery programmes and also public sector investment mechanisms and funding to prime development which can be recovered through obligations and agreements with developers.
- More information on how the approach will link with planning obligations, including to maintain the delivery of new housing.
- Specific reference to delivery models, including approaches that will work in areas with lower land values.

There was a concern that if infrastructure first cannot be implemented effectively, it could become an obstacle to development, and that the lack of a central co-ordinating authority could be an issue. As in relation to Policy 8, there was a call for a new Scottish National Infrastructure Company to be established.

Delivery of national developments

It was noted that there are high expectations for successful outcomes from the delivery of the national developments and that, of necessity, this will involve positive collaboration between all the key partners within local and central government, key agencies, investors and developers. There was a concern, however, that a delivery programme for national developments appears to be somewhat of an afterthought and that this could bring the reality of delivering some of the projects into question.

In terms of collaboration, there was a concern that only a handful of the national developments reference STPR2 or City Region Growth Deals and that very few are mentioned in the IIP. It was suggested that this calls into question the reliability of the delivery strategy in the 'aligning resources' section which sets out the intent to primarily utilise these plans and programmes for delivery.

There was a call for the precise delivery mechanisms to be set out in the next version of NPF4. Reference was made to an agreed set of roles for the different stakeholders, along with funding, timescales and clear monitoring and updating procedures being put in place. A need to de-risk the national developments was also highlighted, and there was reference to setting out costs, phasing and public sector contributions to ensure public sector developers and investors buy in to the projects. In relation to funding commitments, it was suggested that if project-specific commitments cannot be made, then a commitment to pursuing innovative approaches, like the Community Wealth Fund, should be given.

In terms of overall approach, it was thought that a whole system, place-based approach to delivering the national developments will help ensure wider place benefits for local communities. There was reference to how the six spatial principles can be best reflected in their design and delivery. It was also suggested that NPF4 should:

- Highlight the interconnections between national developments.
- Cross-reference to both the spatial strategy and the policy handbook. The expectation was that this cross-referencing will make it easier for planning authorities and others to identify and articulate their role in delivering the national developments.
- Set out any links to the action areas.
- State any related expectations of Regional Spatial Strategies and LDPs. It was also suggested that Part 2 should state that national developments must be incorporated into all relevant LDPs, and each national development should clearly state which LDPs are relevant.

Other comments on delivery included that:

- Community engagement must be a key element.
- Early and ongoing collaboration with key agencies will help remove risks and identify opportunities for innovation.

From a planning resource perspective, it was noted that consideration of national developments will require input in terms of time and resources from planning authorities, but that they would not be in receipt of any portion of the planning fee as they would not be the determining authority. It was suggested that the consequence of this is likely to increase pressure on already stretched planning authorities.

Development plan policy and Regional Spatial Strategies

A specific suggestion was that including a coherent organisational chart which sets out the context, roles and interactive relationships between the key documents and strategies would be helpful.

Reflecting themes raised in the analysis for Part 1 of the draft NPF4, a number of respondents commented on the role of Regional Spatial Strategies and their relationship to the delivery of NPF4 and LDPs. A concern was that a lack of clarity around the relationship between NPF4 and Regional Spatial Strategies could risk the latter becoming meaningless. However, it was also suggested that work on the interim Regional Spatial Strategies has been helpful and constructive, and that ongoing work will continue to provide more clarity on respective roles and be able to set out a clear, functional and operational role for Regional Spatial Strategies, which is complementary to both NPF4 and LDPs.

Also in relation to Regional Spatial Strategies, it was noted that the Scottish Government has indicated that draft statutory guidance is to be published late in 2022. There was a call for this timeline to be brought forward to allow regional groupings to progress the development of their strategies as soon as practically possible, and to more closely align with the approval of NPF4.

City Region or Regional Growth Deals

Comments on the City Region Growth Deals included that, as a funding and governance model, they can manage investment and coordinate the delivery of development opportunities at a strategic scale. However, there was also a concern that referencing growth deals does not lead to their delivery, and that the draft NPF4 seems to be focusing on what is already committed, rather than providing a lever to allow its new vision to be achieved.

In relation to growth deals playing an important role in delivering NPF4 it was suggested that:

- The relationship between Regional Growth Deals and development plans needs to be agreed, explicit and clearly understood. There was a call for NPF4 to state clearly that growth deals should reflect spatial strategies and emphasise the need for a reciprocal and iterative relationship between strategic development plans and growth deals over time.
- It will need to be clearly articulated that growth deals must be aligned with spatial strategies given their different origins from UK and Scottish Governments respectively.

STRP

In terms of STRP's relationship to measures identified through Regional Spatial Strategies and the transport assessment part of LDPs, there was a concern that they will not be supported if they are not included in either STPR2 or future IIPs.

In relation to STPR2, there was a view that it is not as inclusive as it should be and that it will not play the role it should in supporting the delivery of draft NPF4. An associated view was that the infrastructure first policy could fall at the first hurdle for those parts of Scotland where the Scottish Government sees no strategic case for transport-related investment in its broadest sense.

Other comments included that the NPF4 delivery strategy needs to fully reflect the role that Scottish Government and Transport Scotland need to play in considering the implications and opportunities that the trunk road and rail networks have for ensuring quality of place and liveability in many communities.

Local Development Plans

General comments about LDPs included that their action programmes may provide an opportunity to support the effective implementation of NPF4 ambitions. It was suggested that it would be helpful to have some explanation as to how the various components of the LDP would interact with the content of NPF4.

It was acknowledged that recently published draft local development planning regulations and guidance has addressed this to some extent, but there was a concern that there is potential tension whether planning authorities will want to adopt NPF4 policies in full or adapt them for the local circumstances. There was a call for clarity about the extent to which planning authorities will be able to adapt policies. It was noted that this will also be relevant to how Regional Spatial Strategies are to align with NPF4.

In terms of the impact of NPF4 planning policies on LDP delivery, there was also a concern that most of the policies have a criterion outlining requirements for inclusion within LDPs, but that their inclusion as policy criteria could complicate the assessment of planning applications. It was suggested that the LDP requirements should be separated out in NPF4, as their inclusion could lead to potential challenge and issues with the delivery of the spatial strategy.

Many of the other comments addressed the delivery of land for housing, and included that:

- The preparation of LDPs should have regard to the economic realities of housebuilding and housing markets. It was suggested that there is an opportunity for local authorities to take a more proactive role in infrastructure planning but this will require them to be resourced appropriately and be willing to draw on funds.
- Policy 9 (Quality homes) must align with the LDP Regulations consultation and focus on remedies when a housing land pipeline is not being delivered. Tools such as Housing Land Audits and two-yearly delivery reviews will be

essential as part of this evidence checking and must be undertaken transparently and consulted on properly.

- There should be a policy basis for Scottish Ministers to require local authorities to address the under-delivery of an LDP, or an LDP being out of date. It was suggested that this would support the proposed NPF4 policy change in relation to the need for a longer-term housing perspective which states that ‘future plans can promote immediate deliverability and viability’.

Local Place Plans

There was support for highlighting the importance of Local Place Plans and their role in identifying the needs and priorities of communities. There was also a concern, however, that the reference feels like an afterthought, despite their prominence in the Planning (Scotland) Act 2019.

It was suggested that with Planning Circular 1/2022: Local Place Plans having now been published, it would be helpful for this to be linked to NPF4. In terms of other aspects that should be covered, there was reference to the options available when communities have their ambitions frustrated and are not able to develop and improve their area as they would like.

Others were looking for clarity around how Local Place Plans relate to development plans and especially how much influence they will have on LDPs. It was noted that this is being taken forward under separate consultation arrangements, with some noting that they look forward to being involved in that process. In terms of specific issues that respondents wanted to see resolved, the following were highlighted:

- How Local Place Plans will support delivery, rather than merely reflecting local opposition to development. It was suggested that there appears to be no scope to incentivise local groups preparing such plans to include an element of development within their area.
- Circular 1/2022: Local Place Plans, needs to be amended to confirm that Local Place Plans sit outwith the development plan. It also needs to clarify exactly the weight a registered Local Place Plan can have upon LDP preparation.

It was suggested that, as further guidance on Local Place Plans continues to be developed, this should include a recommendation for developers to respond to ambitions set out therein. Other comments included that the importance of engagement with older people should be emphasised. It was noted that older people in Scotland represent a diverse demographic of our population and, as such, engagement must be a core theme running through the planning process. More generally, however, there was a concern that it will be a challenge to encourage as many different members of the community as possible to get involved in producing a Local Place Plan.

Planning obligations

General observations included that planning obligations could play a key role in placemaking and ensuring the delivery of community infrastructure. It was noted

that there is reference to a review of the effectiveness of developer obligations, but also that work has already been undertaken and published (The Value, Incidence and Impact of Developer Contributions in Scotland, July 2021) and that the next step is to move forward.

In terms of moving forward, the Scottish Government was encouraged to ensure that any potential infrastructure levy supports the provision of vital community infrastructure, including open space, green infrastructure and sustainable drainage and is not used to backfill items such as under-provision of affordable housing.

There was reference to the current system of Community Infrastructure Levy in England, and to it being considered overly complex. There was a call for the Scottish approach to not be overly burdensome, with further comments including that:

- Greater detail will be required to provide clarity for planning authorities, communities, and developers.
- The critical issue with any levy is the amount of capital provided. This must be sufficient, target its original purpose and be fair.

An alternative view was that the legal requirements related to planning obligations are a barrier to delivering meaningful large-scale infrastructure, because:

- It is difficult to establish that major new infrastructure is required to mitigate local development, and there is a prohibition on the pooling of financial contributions towards new large-scale infrastructure; and
- In consequence, financial contributions are funnelled towards piecemeal local infrastructure rather than transformational new infrastructure, particularly, but not exclusively, new transport infrastructure.

Connected to this was the suggestion was that NPF4 makes no attempt to address this issue or align policy with changes proposed under the Planning Act (Scotland) 2019, including the infrastructure levy, or with other forthcoming legislative priorities including in respect of land value capture.

In terms of challenges that will need to be addressed, it was noted that:

- Areas which experience lesser demand can be further hampered by low levy income.
- There have been issues when trying to secure developer contributions to deliver healthcare facilities, and there is an opportunity through NPF4 to address the importance of healthcare-related infrastructure to deliver local, liveable, compact, healthy places.

It was also argued that the overlap and interface between existing planning obligations and the proposed Infrastructure Levy should be carefully considered and clearly articulated to avoid developers incurring additional costs through double charging.

Land Assembly

Comments on compulsory purchase powers included that they are an effective means of supporting a range of policy intents and outcomes, and could play a key role in freeing up land for housing and other priorities. There was also a view, however, that the compulsory purchase order process is not fit for purpose, although it was noted that reform of the compulsory purchase system is planned.

Further points included that there is no reference to compulsory sales orders and, more widely, that there is no detail on how a more positive and proactive approach to land assembly will be implemented. Moving forward, it was suggested that the increased use of compulsory purchase powers will rely on adequate skills and resourcing within local authorities and must be reinforced by clear and accessible funding initiatives.

It was also noted that there are avenues such as the Community Right to Buy for the Furtherance of Sustainable Development which provide a potential route for communities who wish to acquire land. It was suggested that this community right should be part of the delivery mechanism for local plans, as a legal backstop when other avenues have been frustrated.

Masterplan Consent Areas

It was suggested that Masterplan Consent Areas should be an effective way of providing the outline parameters and confidence to grasp investment and job creation opportunities if they are operationalised in a similar way to corresponding mechanisms, such as Local Development Orders, in other jurisdictions.

In terms of the approach, it was suggested that:

- NPF4 should be clear that ‘partners’ should include landowners, whose interests should be protected in preparing, proposing and approving masterplan consent areas.
- Any regulations developed must ensure that detailed schemes are developed in consultation with the relevant transport/road authority and that transport needs and connectivity requirements are fully identified and approved prior to the publication of any detailed scheme.

Further comments included that the approach could potentially cover industrial estates and land suitable for the zoning and development of waste management facilities. These should in turn be able to benefit from up-front planning permission. However, there was a concern that without a significant shift in culture within planning authorities, it is difficult to envisage a situation whereby detailed planning permission could be obtained for a waste management development by any means other than an application for full planning permission.

Investing in the planning service

A number of respondents commented on investing in the planning service, with acknowledgement of the need to invest welcomed. In terms of the scale of investment required, it was reported that the Planning (Scotland) Act 2019 has led

to 49 new, unfunded duties and that there is a need to take account of the context of diminishing resources and increased workloads in planning authorities.

With specific reference to NPF4, it was noted that the draft introduces many elements that will require particular specialist skills and areas of expertise, and that resources will be required for reskilling and upskilling. There was also a view that the need for investment is exacerbated by the multidisciplinary requirements of NPF4 and the Planning (Scotland) Act 2019.

In terms of specific topics on which learning support and training may be required, there was reference to:

- The impact of, and adaptation to, climate change.
- Placemaking and landscaping.
- Health and well-being requirements.

It was also noted that training requirements will extend to both local authority planners, elected members, and community council members.

It was suggested that the Scottish Government should look to work with professional bodies to provide training, skills and people to enhance a planning department's capabilities to support this ambitious agenda. It was also noted that delivery of NPF4 will require collaborative partnership working with a range of organisations and stakeholders who will assist with professional knowledge on needs, future provision, finance and provision of infrastructure.

In addition to requirements for reskilling and upskilling, it was also suggested that the following will be required:

- Clarity on the respective roles and funding streams available from central and local government, multi-agency, private sector, and partnership arrangements.
- External expertise for a range of specialist assessments.

It was also reported that experience suggests that the delivery of projects absorbs much more resource than the initial conceptual and planning stages of a project.

Given existing pressure on services, combined with the new duties arising from the Planning (Scotland) Act 2019 and NPF4, there was a concern that the only route to extra resourcing referenced is through an increase in planning fees. It was reported that recently published research from RTPI Scotland suggests this will not bring in adequate resources for the planning service to undertake its statutory duties and deliver NPF4.

There was a call for more fundamental reform of how planning authorities are resourced, including with more powers being devolved to local authorities to properly fund planning services. There was also a call for a comprehensive resource and skills strategy to be published as part of the delivery programme.

A very different perspective was that proposals to increase planning fees do little to address the root causes of inefficiencies and over-spends within some planning authorities, and that there also needs to be a focus on establishing standards of efficiency. It was also suggested that NPF4 should make provision to allow an applicant to appeal against fees which increase above recovery cost, and to allow those authorities which under-spend against expected cost recovery, to reduce planning fees accordingly.

Other suggestions included that:

- Planning fees should be ring fenced by local authorities purely for resourcing the planning service.
- Any increase in fees must be met with an associated improvement in the quality of service provided. There was specific reference to current planning authority resourcing acting as a significant constraint upon the rapid development of renewable energy infrastructure.

Monitoring

There was broad agreement that monitoring will be an essential part of the NPF process, and also that it will be a significant and challenging undertaking. Another general observation was that any monitoring programme should look very different to that carried out for NPF3, not least because it should include an approach to monitoring Part 3 of NPF4. In relation to NPF3, it was suggested that without very clear analysis of its success or otherwise, it is very difficult to consider the likelihood of success of NPF4.

Further comments included that while planning authorities will engage, their resources will be focused on LDP monitoring processes. It was suggested there should be a consistent methodology and that this will be particularly important if three levels of plan are to be monitored – NPF4, Regional Spatial Strategies and LDPs. In terms of overall responsibilities, it was suggested that monitoring of NPF4 should be led and undertaken by the Scottish Government as the coordinating authority.

For the purposes of monitoring whether the six outcomes are being met through the national planning policies, it was suggested that the Scottish Government will need to devise indicators for the application of these policies which can track change over time. It was also suggested that change needs to be attributable to planning decisions that are being made as a result of the planning policies.

There were also comments about the difficulty in measuring some of the concepts referred to in the draft NPF4, such as improvement in the ‘quality’ of places or whether they are more ‘vibrant’ or ‘creative’. It was suggested that to be successful, effective monitoring needs to be based on clear targets set against an evidence report/base.

Other comments and suggestions included that the approach should prioritise measures of effectiveness and monitor impacts and outcomes of policy integral to the system. This could include broader metrics capturing progress on placemaking,

environmental and socio-economic development and the alleviation of deprivation. There was also reference to: landscape quality standards; indicators to deliver positive health and wellbeing; environmental outcomes to address climate change action and biodiversity; and measures of inclusive growth and reduced inequalities. Other comments included that the approach:

- Could be managed by setting short-, medium- and long-term targets.
- Include regular reporting, perhaps on an annual basis in the form of a Delivery Programme and Annual Monitoring Report or similar. It was suggested that reporting should be to the Scottish Parliament.
- Include a mechanism for the review and adjustment of any policy that is underperforming. In particular, there was a call for clarity on what circumstances might trigger the need for NPF4 to be amended.

With specific reference to infrastructure investment it was suggested that there need to be indicators covering: housing needs and demand; longer term healthcare provision; changes in air travel and tourism; and educational and utility requirements. It was also suggested that average distances travelled for shops, work and active travel would be a metric that will inform current and future IIPs.

It was suggested that the different monitoring roles of central and local government need to be aligned, and a consistent methodology adopted to provide a 'best fit' approach to avoid duplication of resources. Finally, there was a request for engagement and consultation on the development of a monitoring system and, more widely, on an expanded section on Monitoring and Delivery in the final NPF4.

Other themes to be covered in the delivery programme

Respondents also highlighted a number of themes that they wanted to see covered or reflected in the delivery programme developed. These included:

- Local Outcome Improvement Plans. It was noted that these are a well-established and key feature driving the work of Community Planning Partnerships. It was considered surprising that they have not been referenced as playing a role in delivering the agenda set in NPF4, particularly when so many of the policies and outcomes require some form of partnership working.
- Mediation. There was disappointment that NPF4 does not reference mediation as an aid to delivery through collaboration rather than conflict, as set out in the recent Planning Circular 2/2021: Guidance on the Promotion and Use of Mediation in the Scottish Planning System. It was suggested that NPF4 would offer an ideal opportunity for the Scottish Government to underline its real commitment to widening the use of mediation at a national level.
- Community involvement and engagement. A collaborative approach involving communities was seen as key, and it was suggested that there needs to be more reference to how communities, particularly disadvantaged and marginalised communities, are supported to contribute at a strategic level.

There was specific reference to exploring the introduction of public interest panels.

Other strategies, plans or statements

Respondents also referenced a range of other strategies, plans or statements that they wanted to be considered, either in developing the delivery programme or more generally across NPF4. These included:

- The Digital Planning Strategy. There was a call for clear consideration of how this can support the implementation of NPF4, and it was reported that RTPI Scotland's research on behalf of the Scottish Government sets out the economic and societal benefits arising from digital transformation.
- Water Resilient Places Policy Framework 2021. It was suggested that the management of our water system and water environment, in the face of climate change, will be a key challenge for the delivery of NPF4, and that its delivery framework should incorporate the Water Resilient Places recommendations.
- The Land Use Strategy and the Land Rights and Responsibilities Statement. It was suggested that NPF4 provides a spatial strategy that delivers on the Land Use Strategy and that embedding the Scottish Government's Land Rights and Responsibility Statement in NPF4 would provide the parameters for 'managing land use in the long-term public interest.'
- Scottish Building Standards and associated regulation. It was suggested that the delivery of NPF4 will be facilitated by aligning with these statutory obligations and legislative requirements.

It was also noted that a number of other methodologies, plans, and guidance will need to be updated to support planners in the delivery of NPF4. There was reference to:

- Scotland's National Marine Plan (2015).
- Designing Streets (2010).
- Creating Places (2013).
- Development Planning and Management Transport Appraisal Guidance (2011).
- Town Centre and Retailing Methodologies (2007)
- Historic Environment Scotland Managing Change Guidance Notes.

Next steps for NPF4

In addition to comments on the development of, and consultation on, the delivery programme there were other references to the next steps required to deliver NPF4. They included that:

- Policies will need to be backed up with further guidance on their interpretation and implementation. It was suggested that NPF4 should set out topic areas

which need such further guidance and interpretation, and identify who is responsible for providing it.

- Where guidance exists, it should be signposted in the policy. It is possible such guidance could be delivered through a refreshed set of planning advice notes, but the guidance would have to have the requisite status and weight in decision-making.

It was also suggested that as the Scottish Government moves towards approval of NPF4, arrangements to cover the transition between the previous legal framework and the Planning (Scotland) Act 2019 will be crucial. There was a call for clear guidance on:

- How NPF4 will be introduced to the planning system and how it will interact with live planning applications.
- As per S13 of the Planning (Scotland) Act 2019, the status of NPF4 in the event of 'any incompatibility between a provision of the National Planning Framework and a provision of a local development plan'. It was suggested that clarity will be critical for both development planning and development management functions.

Finally, and as referenced at various other questions, there was a call for a new national agency/delivery vehicle to be established. It was suggested that this approach could help bridge the gap between the Scottish Government's vision and already stretched local authority resources. Further comments included that:

- A delivery agency should support, rather than displace, regions and local authorities to deliver complex projects and interventions.
- The precise scope and purpose of such an agency requires further consultation.
- This is not a start-from-scratch project, as Scotland has many of the resources and assets needed to do this, but existing expertise is dispersed across different silos and levels of government.

It was also suggested that the general concept of a national team of people with the skills and experience to oversee major infrastructure, energy, digital, housing, and capital programmes, enjoys broad-based support among those involved in planning for and delivering homes and places in Scotland.

Part 5 – Annexes

Annex A – NPF4 Outcomes statement

Annex A sets out how the Scottish Ministers consider that development under NPF4 will contribute to each of the six statutory outcomes identified in Section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997.

Question 56: Do you agree that the development measures identified will contribute to each of the outcomes identified in Section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

Around 175 respondents made a comment at Question 56.

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

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

There were also calls for this part of NPF4 to be expanded to include other relevant outcomes and targets. Specific suggestions included reference to relevant UN Sustainable Development Goals and their targets, National Performance Framework outcomes, and other duties under the Town and Country Planning (Scotland) Act 1997. It was also suggested that the delivery of statutory outcomes should be integrated with other NPF4 components, such as the four spatial strategy themes (Sustainable places, Liveable places, Productive places, and Distinctive places) and the six spatial principles for Scotland 2045. This reflected concern around a perceived lack of integration across other parts of NPF4, such as between the Action Area regional priorities and National Developments. Some respondents wished to see the outcomes section expanded to map the relationship between all components, and how these address delivery of the statutory outcomes.

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

provide clarity on the role of various stakeholders. Overall, it was suggested that there is a delivery gap between ambitions and policies, and realisation of the statutory outcomes.

The next section of the analysis considers comments on each of the six statutory outcomes in turn.

a) meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people

Respondents expressed support for the role of NPF4 in meeting housing needs, and in particular the housing needs of older people and disabled people. This included citing evidence illustrating the potential scale of older people's housing needs. However, while some agreed that the draft NPF4 will make a contribution to this outcome, most of those providing comment suggested that the measures will not be sufficient to meet housing needs. There was a view that revision to the stated policies is required to ensure housing needs are met.

Many of those raising concerns around delivery of outcome (a) referred back to responses to earlier questions and/or reiterated points raised in relation to Policy 7 (Local living) and Policy 9 (Quality homes). References to Policy 9 most commonly related to concerns that:

- NPF4 will not deliver sufficient affordable quality housing.
- The MATHLR assessment approach is not fit-for-purpose.
- Specific MATHLR estimates are too low in some areas.
- The HNDA tool does not identify the full range of housing needs.
- There is a lack of clarity around how a deliverable housing land pipeline will be established.

Respondents also reiterated concerns around how the concept of 20-minute neighbourhoods will apply across the diversity of urban and rural areas, considered in further detail at Policy 7 (Local living).

Other issues raised in relation to outcome (a) included a view that the draft NPF4 does not give sufficient emphasis to the quality and inclusiveness of housing, including in terms of: wheelchair accessibility; the needs of older people; self-build; co-housing; and Houses of Multiple Occupation. Some respondents saw a need to provide stronger direction to ensure that the full range of housing needs are met. It was suggested that older people's housing needs have not been sufficiently integrated within NPF4, and that its policies do not provide a clear framework for planning authorities to assess and meet such needs.

It was also suggested that:

- NPF4 needs to provide a mechanism to identify new housing allocations if such a need arises.
- There should be more reference to the importance of existing buildings in meeting housing needs, including delivery of net zero targets.

- The 'brownfield first' approach may be too restrictive to meet housing needs, including the needs of older people and disabled people.
- The draft NPF4 does not recognise the spatial factors in how and where housing needs are likely to be met. It was also suggested that it should include positive support for rural housing that meets housing needs, and fits with landscape and settlement patterns.

b) improving the health and wellbeing of people living in Scotland

There was support for the inclusion of health and wellbeing as a statutory outcome for NPF4, recognising the important role of the planning system for health and wellbeing. There was also support for the role of 20-minute neighbourhoods in relation to health and wellbeing. However, there was also a view that the development measures identified will not be sufficient to deliver outcome (b).

Many responses referred back to answers at earlier questions, or reiterated points raised in relation to Policy 14 (Health and wellbeing). This included:

- Calls for clarity on the approach to health inequalities and the assessment of health impacts.
- Reference to the role of planning in provision of healthcare services.
- Issues around air quality and noise.
- Calls for greater reference to the food environment.
- Reference to the importance of design and quality of places.

There were concerns that the policies relating to these issues are not strong enough.

Other issues raised in relation to the delivery of health and wellbeing outcomes included calls for NPF4 to highlight links between outcomes (a) and (b), noting the importance of access to a warm and safe home for health and wellbeing. There was concern that development measures relating to outcome (b) do not address health and wellbeing issues related to existing housing and areas of deprivation, and a view that NPF4 will not improve the environment in which the majority of Scotland's population live. Respondents also saw a need for greater emphasis across NPF4 on active travel and supporting people to be more physically active.

c) increasing the population of rural areas of Scotland

Comments on outcome (c) included approval for the focus on increasing the population of Scotland's rural areas, and some responses highlighted the need to address social and economic challenges for rural communities. However, respondents also felt that NPF4 policies will not be sufficient to deliver this outcome, reflecting a view that the draft NPF4 does not provide a sufficiently comprehensive or detailed framework to address the priorities of Scotland's rural areas.

Many of these comments reiterated issues raised earlier in relation to Policy 31 (Rural places), reflecting a view that it lacks ambition for the sustainability of rural

communities and does not give sufficient weight to delivery of sustainable growth across rural economies. Other issues raised in relation to outcome (c) included that providing housing is a fundamental part of rural repopulation, and that Policy 31 should more fully support appropriate housing development where it meets local need.

It was also suggested that NPF4 needs to recognise that rural areas operate differently to urban and suburban areas and therefore require a more flexible and specific approach to planning policy.

There were also concerns relating to:

- The resettlement of previously inhabited areas and reuse of vacant and derelict land.
- The absence of an allowance for windfall housing development within accessible or pressured areas.
- The delivery of 20-minute neighbourhoods in rural areas.

The importance of public transport for rural repopulation was highlighted, as were issues around delivery of digital infrastructure across diverse rural places and the funding and investment required.

Respondents also highlighted the need for investment in jobs, economic opportunities and transport alongside delivery of development to support population increase. It was suggested that NPF4 does not do enough to demonstrate that this will be delivered. This included specific concerns that the draft NPF4 does not do enough to address challenges around delivery of sustainable transport and active travel in rural areas. There were calls for clearer links to be drawn between outcome (c) and Policies 7 (Local living) and 10 (Sustainable transport). However, others saw potential for some NPF4 policies – such as Policies 7 and 8 (Infrastructure first) – to hinder rural repopulation.

It was suggested that a new planning tool is required to deliver community-led rural repopulation, including additional development classes and designations. This included suggestions for a specific focus on issues around second homes in rural areas, and a role for assets of community value.

d) improving equality and eliminating discrimination

Several respondents agreed that the policies set out by the draft NPF4 will help to improve equality and eliminate discrimination. However, there was a view that NPF4 could do more to emphasise the cross-cutting nature of equalities considerations, and that all NPF4 policies should identify how they will support outcome (d). It was also described as disappointing that there is not currently a specific Human Rights Impact Assessment.

In connection to Policy 4 (Human rights and equality) there was a question as to whether human rights and equality need to be development plan policies within NPF4 as they are addressed elsewhere in statute.

Comments about Policy 5 (Community wealth building) included that there should be guidance on how this can be fully delivered, including examples of what 'socially productive use of land and property' looks like. It was suggested that it should be about maximising land and assets to support the wider regeneration of communities, but that the policy focus appears to be more on the economics of community wealth building rather than quality of life.

In relation to housing (as covered under Policy 9: Quality homes) it was noted that, although housing is referenced as a human right in Housing to 2040, there is no reference to this within NPF4 or any of the supporting documents. There were also calls for communities to be given the right to appeal against planning decisions which are contrary to LDPs, Local Place Plans, and/or NPF4.

Other issues raised in relation to delivery of outcome (d) included calls for NPF4 to do more to ensure that equality principles are applied to all statutory outcomes, and other components of the framework. It was argued that both the Public Sector Equality Duty and the Fairer Scotland Duty should be better acknowledged and embedded in NPF4, ensuring these apply across all parts of the planning system. This included specific calls for equality to be a strategic priority for LDPs and planning decisions, and for outcome (d) to be a guiding principle for NPF4 alongside climate change and nature recovery. Some also felt that NPF4 could do more to address disparities and inequalities between Scotland's communities, including between urban and rural areas. Respondents also highlighted the importance of monitoring and evaluation to ensure that equalities standards are being upheld.

e) meeting any targets relating to the reduction of emissions of greenhouse gases

Several respondents expressed their approval for the approach to emissions reduction set out in the draft NPF4. These respondents felt that the spatial strategy sets a positive tone for delivery against emissions reduction targets. However, there were also concerns around the scale of change required to achieve the targets. It was suggested that NPF4 will not make a substantial enough contribution to delivery of climate targets, and that the policies set out do not represent an enabling policy framework to support delivery. There was a related view that tackling climate change should be an overarching aim across all NPF4 policies.

Issues raised specifically in relation to Policy 2 (Climate emergency) included concerns that Policy 2 is not strong enough to deliver the required transformational change, and that NPF4 does not go far enough to ensure planning systems take action to embed climate mitigation and adaptation measures into developments. Further comments included that:

- Some of the measures required may be matters that should be addressed through changes to Building Standards.
- It is not clear how the 'significance' of emissions will be measured - whether relative to the scale and type of development (and a matter of qualitative judgment) or a fixed threshold?

- With reference to the circular economy, there is insufficient advice and guidance available to business and local authorities to fully understand and plan for this going forward.

There were also calls for greater support for delivery of renewable energy generation and infrastructure development. Respondents reiterated concerns raised in relation to Policy 19 (Green energy) that the measures set out could hinder renewable energy development and will fail to deliver against targets set out in the draft Onshore Wind Policy Statement.

Concerns were also raised in relation to the inclusion of the Grangemouth Investment Zone in ND8, and around potential use of bioenergy to decarbonise Grangemouth. Links between emissions reduction and improved biodiversity were also highlighted, including the importance of nature recovery in maximising potential to absorb carbon. There were calls for NPF4 to take a single, co-ordinated approach to delivery of climate and nature/biodiversity outcomes.

f) securing positive effects for biodiversity

Respondents expressed support for the role of NPF4 in securing positive effects for biodiversity, and the prominent role given to biodiversity. However, the concerning scale of biodiversity loss in Scotland was also highlighted, and some were of the view that the wording of NPF4 should be strengthened to ensure that the opportunity to deliver positive effects for biodiversity is not missed.

There was also concern that the summary of Policy 3 (Nature crisis) provided at Annex A ('...that development plans and proposals that contribute to the enhancement of nature networks should be supported in principle') is not an accurate representation of the policy as set out in the draft NPF4. Other concerns reflected issues raised earlier in relation to Policy 3. There was a view that Policy 3 needs to be strengthened through a requirement for planning decisions to give significant weight to the nature crisis. There were also calls for further clarity around how LDPs and development proposals should facilitate biodiversity enhancement, including concern regarding the focus on restoration and how development proposals can minimise biodiversity and nature impacts.

Comments also highlighted the role of Policies 12 (Blue and green infrastructure, play and sport), 32 (Natural places) and 34 (Trees, woodland and forestry) in relation to outcome (f). This included calls for NPF4 to ensure consistent application of these policies across planning authorities, and for greater flexibility when considering redevelopment of brownfield land under Policy 30 (Vacant and derelict land and empty buildings). It was also suggested that redrafting is required to address overlap and inconsistency between Policies 3 and 32, with some suggesting that these policies should be combined. There were calls for NPF4 to include links to agriculture and forestry policy to support delivery of positive biodiversity impacts.

Annex B – Housing numbers

Question 57 – Do you agree with the Minimum All-Tenure Housing Land Requirement (MATHLR) numbers identified above?

Around 170 respondents made a comment at Question 57. There were a small number of very detailed comments, including comments on the figure for each of Scotland's 32 local authority areas. This information is available to the Scottish Government, and the analysis below presents only a brief summary.

Other respondents raised issues already covered under the earlier analysis at Question 31. As detailed in analysis at Question 31, 31(a) states that an LDP should identify a housing target for the area it covers, in the form of a Housing Land Requirement. Representing how much land is required, it should at least meet the 10 year Minimum All-Tenure Housing Land Requirement set out in Annex B of NPF4.

Some respondents commenting at Question 57 noted that they agreed with the MATHLR number set out for their own area. This included a number of 'Local Authority' respondents who reported that they had been consulted about, and agreed with, the MATHLR set out for their area. Further comments included that the Scottish Government took an inclusive approach to arriving at MATHLR numbers and that local authorities know their areas best and, by engaging with communities, businesses, and developers at a local level, are best placed to determine any increase beyond the minimum that the MATHLR represents.

However, some of these respondents also went on to make suggestions or to raise concerns. These included that:

- An explanation of how the MATHLR calculations are carried out, or reference and signposting to the 'Housing Land Requirement – Explanatory Report', could be useful.
- Local authorities which have already undertaken HNDAs are in a position to provide a detailed a response to the interim draft MATHLR. This raises the question of how those authorities that do not have an up-to-date HNDAs could be expected to provide a similarly informed response.
- Meeting the MATHLR in the next LDPs will be challenging for some areas and could run contrary to many other NPF4 policies. An alternative view was that in some cases the figure is acceptable but unambitious.
- The decision to calculate the figure based on 2022 to 2036 housing needs estimates may cause confusion at the evidence report stage of the new process. Developers may want to go back to 2018 (as the base year of the household projections on which the HNDAs are based) or to 2020 (the date at which the HNDAs model has been set). This is because they want to address the failure to deliver housing in line with the household projections for those now past years. As housing need from 2020 is included in the figures, it is considered that policy should be explicit that no backlog in meeting demand for housing should be factored in.

Although most 'Local Authority' respondents did agree with the figures set out, others did not. Reasons given included that the methodology used was not effective for low volume, low population areas like the Outer Hebrides.

There was also a view that the MATHLR process does not sufficiently recognise the role of regional and local housing markets, or how markets operate across boundaries. It was suggested that the MATHLR would be more appropriately established through regional partnership working and should remain a function of the Regional Spatial Strategies.

Other respondents, including some 'Development, Property or Land Management Company or Representative Body' respondents, also had fundamental concerns and suggested that the MATHLRs and the methodology by which they have been established are inadequate and flawed. Specific concerns included that:

- The numbers set out fail to reflect the urgency and the magnitude of the challenge faced in addressing Scotland's growing housing crisis, and do not support the objective of increasing the delivery of new homes.
- Notwithstanding the impact of COVID-19, housing completions have been moving in the right direction across Scotland in recent years, but the introduction of such low targets would place this positive trend into a sharp reverse.
- The figures appear to be very low and may have a major impact upon the housebuilding industry in Scotland. Low levels of future homes means that existing stock becomes more expensive as competition increases and affordability issues become even more pronounced. The proposals appear to lack any ambition to address important matters of housing the Scottish population, irrespective of the tenure required.

More generally, it was suggested that local authorities would be expected to have undertaken significant further work by the end of the consultation period for NPF4, and that the Scottish Government could be expected to have undertaken some degree of critical analysis of the returns received to ensure they are content with presenting the figures.

It was noted that Homes for Scotland has proposed alternative MATHLRs for some authorities, and that the methodology they have used is based on the Scottish Government's own steer on considering, and not dipping substantially below, past completions levels. It was also reported that the same flexibility allowance of 25% (in urban areas) or 30% (in rural areas) as applied by the Scottish Government has been used.

It was also suggested that there are examples of good practice amongst some local authorities in revising the default MATHLR figures and these could assist in guiding a comprehensive review of the current figures. It was noted that the MATHLRs will be important, and there was a call for the Scottish Government to take time to work with local authorities and stakeholders, including home builders and housing associations, and to get the figures right.

From the housing association perspective, there was a concern that there has not been adequate time or opportunity for them to feed into the MATHLR process. Further points made were that:

- There is data on the backlog of housing need in the Scottish Federation of Housing Associations, Chartered Institute of Housing Scotland and Shelter Scotland report, 'Affordable Housing Need in Scotland Post 2021'. This should have been considered.
- Focusing on a minimum MATHLR may discourage ambition when it comes to identifying enough land to build the number of affordable homes the Scottish Government has committed to building in the next 10 years.

A contrasting position was that the approach is artificially inflating housing figures and that the calculation methodology used to reach the MATHLR always rounds the housing figures upwards and does not take into account population declines. It was suggested that this means that where aspirational increases are proposed in one area, there are no balancing reductions in housing units required and the national figure continues to rise. It was reported that the Scotland-wide MATHLR amounts to 200,342 units, which represents a 'flexibility percentage' of 77% over and above the HNDA tool result. It was suggested that this is highly concerning if considered a minimum figure. Other comments included that:

- The population data used for the MATHLR calculations needs to be up-to-date. Current figures reflect the pre-Brexit and COVID situation.
- No justification is given for the additional flexibility allowance of 25% in urban and 30% in rural areas, and that these percentages are too high.
- An all tenure target will not deliver efficiently on the affordable and specialist need housing that is really needed but will allow more market rate 'executive' homes to be given permission and built by volume house builders.

There was also a concern about the lack of detail as how the MATHLRs will translate into the delivery of provision of housing land for older people. It was noted that NPF4 provides no guidance for LDPs on how much land requires to be available to meet the housing needs of older people in each local authority area. As at previous questions, it was suggested that this runs contrary to the requirements set out within the Planning (Scotland) Act 2019, which requires LDPs to include land for housing for older people.

There was also a fundamental concern that the MATHLR process has been undertaken without reference to the climate crisis, meeting net zero targets and addressing the biodiversity crisis. As a result, the draft NPF4 appears to leave local authorities to somehow square the MATHLR with meeting climate targets.

Other concerns related to the specific figures set out and included that:

- In real terms, the figures for Highland represent a significant decrease in available land for housing. The lack of a sufficient supply of housing land is a very real threat to the housebuilding and construction industries in the Highlands, but more importantly for the growth of the area itself. Artificially

restricting supply will only fuel price increases in the market, making properties more expensive, rather than more affordable.

- The MATHLR figures anticipate a continuation of recent trends of higher levels of housebuilding in the East, and lower in the West. However, the population projections for 2018-43 show population growth in five out of eight Glasgow City Region local authority areas and further consideration is needed to better convey the complexity of the dynamics of the Glasgow City region.
- In contrast, that the figure for Glasgow is over-generous, takes no account of Brexit and the pandemic's possibly permanent changes to peoples' ways of conducting their working lives, and cannot possibly be met.
- The figures for Aberdeen City and Aberdeenshire are too high and have not been reduced sufficiently to reflect the impact of changes to the energy sector.

Annex C – Glossary of definitions

Question 58 – Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

Around 200 respondents made a comment at Question 58. A full list of all suggested changes to existing definitions, along with suggestions for other terms to be added to the Glossary, has been provided to the Scottish Government.

The most-frequently suggested additions were definitions for:

- Accessible/accessibility/accessible housing.
- Ancient woodland.
- Balanced development.
- Climate change/emergency.
- Community wealth building.
- Deliverable land.
- Fair work.
- Green economy.
- Green jobs.
- Housing land pipeline.
- Infrastructure.
- In principle support.
- Just transition.
- Low carbon fuels.
- Nature-based solutions.
- Nature positive.

- Net emission technologies.
- Net economic benefit.
- Positive effects for biodiversity.
- Prime agricultural land.
- Ramsar sites.
- Remote rural areas.
- Rural places/areas.
- Significant.
- Significant emissions.
- Significant travel generating use.
- Significant weight.
- Small sites.
- Unacceptable.
- Vacant and derelict land.
- Wellbeing economy.

In terms of suggested changes to existing definitions, the most-frequently referenced were:

- 20-minute neighbourhood.
- Affordable home/affordable housing.
- Brownfield.
- Circular economy.
- Deliverable land.
- Enabling development.
- Green infrastructure.
- Green space.
- Housing land requirement.
- Nature network.

Impact Assessments

The following Impact Assessment Reports, along with supporting information, have informed and been published alongside the draft NPF4:

- Strategic Environmental Assessment: Environmental Report.
- Society and Equalities Impact Assessment Report.
- Partial Business and Regulatory Impact Assessment.

The number of respondents commenting at Questions 59 - 70 tended to be lower than at other questions. A small number of respondents submitted more detailed responses. As with all other comments, these are available to the Scottish Government.

Strategic Environmental Assessment: Environmental Report

The consultation asked five questions about the SEA: Environmental Report.

Question 59 – What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

Around 50 respondents made a comment at Question 59, with a number of respondents noting that they agreed, or agreed in principle, with the environmental baseline set out.

Positive comments about the accuracy and scope of the baseline set out included that it is comprehensive, appropriate and proportionate to enable the impacts of implementing NPF4 to be suitably measured through monitoring arrangements. Elements which respondents particularly welcomed included:

- The extensive use of maps.
- The identification of key pressures and trends affecting the baseline.
- Recognition of the undesignated historic environment.

However, there were also some broader concerns. These included that there are many caveats, the baseline is not far-reaching enough, and that the lack of data for the last 3-4 years, especially in the water and pollution context, is problematic. There was also a concern that the baseline appears to be centred on analysis and statistics principally provided by NatureScot. There was a call for an independent scientific review of the accuracy and scope of the environmental baseline, to ensure that this is the correct starting point.

There was also a view that the environmental baseline is very optimistic, including in relation to biodiversity losses, the condition of our soils, and the state of our freshwaters and some marine habitats.

Comments relating to the overall scope included that:

- The longstanding decline in biodiversity and woodland cover is given less attention than the positive aspects of the natural environment in Scotland.
- The marine environment is outwith planning jurisdiction.
- There is no recognition that some of the greatest impacts, such as that of agriculture on the condition of protected sites, are not managed or directed by the planning process.

There were also a number of specific aspects that respondents wished to see covered. These included:

- The Key Pressures and Trends section could recognise a number of positive interactions between the historic environment and other policy areas.
- The Action Areas section does not use an appropriate measure of the contribution of scheduled monuments. and it is not clear whether the scheduled monument data that is given has informed or influenced the development of the action areas. Also, the data insights do not include any other historic environment assets and places, such as listed buildings and conservation areas. This may have led to a lack of recognition of the contribution historic environment resources can make to the delivery of the spatial strategy.
- The baseline for biodiversity, flora and fauna should additionally, where relevant, include World Heritage Sites, such as St Kilda.
- There should be specific mention of Local Landscape Areas.

Other topics that respondents wanted to see covered in the environmental baseline included:

- In relation to ND7 (Island Hub for Net Zero), reference to Scapa Flow MPA.
- Increased wave heights.
- The possibility of changing windspeeds, notably extreme gusts, which will affect not only residential properties and their design, but also electricity network resilience and renewable energy generation technologies.
- The contribution of soil biology/biodiversity to the sequestration of carbon and how the inappropriate application of pesticides and fertilisers contributes to carbon losses through depletion of soil biota.
- Temperate rainforests, which are of significant national value and are under extreme threat from invasive species, overgrazing and direct loss.

It was also suggested that a map of remnant ancient woodland in Scotland should be added.

In terms of content that respondents wished to see changed, there was reference to:

- The coverage of the significance of the increased volatility in weather.

- References to 'nuisance', for example in relation to noise. It was suggested that these should be replaced with 'adverse' impact. It was noted that 'nuisance' has a legal definition which is not part of the NPF4.

It was also suggested that Appendix B (Relevant Plans, Policies and Strategies) should be cross-referred to within NPF4 itself.

Finally, it was suggested that the accuracy and context of the predicted environmental effects could be improved by the full delivery of the Better Biodiversity Data Project. The focus will be on delivering a world-leading data management system for the whole of Scotland – linking through local, regional and national data collection, use and analysis.

Question 60 – What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report?

Around 40 respondents made a comment at Question 60.

Some of these respondents either noted that they agreed, or agreed in principle, with the predicted effects. However, it was also suggested that the assessment is inadequate or optimistic. It was also described as hard to validate and there was a call for further detail on how biodiversity, climate and environmental targets are decided upon, and are to be measured and enforced.

Further comments included that the assessment should cover or include:

- An estimation of the effects of a successful reduction in greenhouse gases.
- The possibility that global warming is other than anthropogenic.
- The impact of the removal of greenspace, and particularly the last greenspace, on communities.

It was also suggested that the significance of NPF4 in meeting the requirements of relevant environmental legislation is not made clear in the SEA. An example given was that in relation to ND7 (Island Hub for Net Zero), it is noted that consideration needs to be given to the implications of European sites. There is, however, no mention of meeting the requirements of the Habitat Regulations in either the mitigation/opportunities section or the text of ND7 in the draft NPF4.

Habitats Regulations Appraisal (HRA) and national developments

It was noted that in the Initial Screening Record for the HRA, the draft spatial strategy and all the draft planning policies, have been scoped out as having no likely significant effects. It was also noted that only a partial HRA process appears to have been carried out in respect of some proposed national developments.

However, it was suggested that Policy 19 (Green energy) should be screened in, as it clearly supports more renewable energy development across the whole of Scotland, and does not guide these away from European sites specifically. This was considered to be of particular concern given that LDPs are no longer required

to contain spatial locational guidance for onshore wind (which previously listed European sites as 'Areas of Significant Constraint').

It was suggested that, at this advanced stage of the NPF4 process, the draft HRA should have been provided for comment, and that this information must be made available before any further consultation and Parliamentary scrutiny is undertaken. It was also noted that NPF4 should not be approved by Parliament, and cannot be brought into effect or adopted, until the competent authority, in this case the Scottish Government, has undertaken full appropriate assessment.

ND7. Island Hub for Net Zero

There was agreement that ND7 should be screened in, and also suggestions for other issues to be considered. These included that:

- The reasoning should have included potential for any onshore wind development in Orkney, Shetland and the Outer Hebrides to affect SPAs.
- The summary of foraging distances during the breeding season appears to have only included some species.

Other points raised included that:

- The screening report has considered all Ramsar sites as if they were European sites. While this approach is welcome, it does not match the policy within NPF4 itself where impacts on Ramsar sites are assessed according to their underlying designation.
- Islands also have a relatively limited amount of available land for development. This makes taking a place-based and plan-led approach to the delivery of this national development even more important. This should be supported by a requirement for collaborative working. Working in this way will ensure that the full range of benefits to development can be achieved, by making sure that an inclusive understanding of planned development is achieved.

ND8. Industrial Green Transition Zones

It was noted that the delivery of infrastructure to support ND8 has the potential for significant effects on the site and setting of both terrestrial and marine historic environment assets, and that the SEA identifies a potential adverse effect. It was also reported that the reuse of existing infrastructure has the potential for positive effects where assets of historic significance can be reused and maintained, particularly designated industrial heritage.

With specific reference to the flood protection scheme at Grangemouth, it was suggested that coastal squeeze should be included in the predicted environmental effects section.

ND10. Hunterston Strategic Asset

Comments included that, in addition to Kelburn Castle, there are a number of other nationally important heritage assets that may be affected by ND10. This includes

some scheduled monuments, and also the category A listed building Hunterston Castle and its associated designed landscape. It was suggested that project level proposals will need to give detailed consideration to such impacts, and identify mitigation to minimise them.

It was also noted that the site is an existing port and its operational activities are anticipated to be in line with other ports situated around the coastline of Scotland. It was suggested that matters of shipping are outwith the planning jurisdiction, and that the UK Marine Policy Statement would be the principal policy statement in this regard.

ND12. Strategic Renewable Electricity Generation and Transmission Infrastructure

It was suggested that the delivery of projects to support ND12 has the potential for significant environmental effects. This includes effects on the site and setting of both terrestrial and marine historic environment assets.

There was also a concern that, despite recognition that the development types included within ND12 have a high likelihood of causing significant effects on European Sites, it has then been screened out from requiring HRA Stage 2 – Appropriate Assessment solely on the grounds of non-spatial definition.

It was also noted that there will be no other means of directing development away from European sites, or providing other mitigation, at a strategic/plan level. It was suggested that recognition of the cumulative pressures on European sites and the need to avoid them, along with the need to fully assess the impacts of any further developments, should be made within NPF4.

Other comments included that:

- A partial HRA process raises potential legal risks for any proposals coming forward under ND12. There was a request for the Scottish Government to confirm that the HRA has been subject to a full legal review and to review the implications of designating non-spatial national developments.
- A plan-led approach would give more certainty for communities, developers, decision-makers and consultees. It will also ensure that ND12 is in line with NPF4 Policy 1 (Plan-led approach to sustainable development). Taking this approach would not change the fact that site specific assessments, and consenting processes, are critical to sustainable outcomes.

Other national developments

Comments on other national developments included that:

- ND1. Central Scotland Green Network. Opportunities to maximise landscape benefits should also tie in with local heritage and larger designations such as Gardens and Designed Landscapes and Battlefields.
- ND4. Urban Sustainable, Blue and Green Drainage Solutions. Any opportunities to enhance and promote access to the historic environment

should be maximised. While negative effects have been predicted, there is also the potential for positive effects. Innovative water management in placemaking can use historic environment assets as part of drainage solutions. A good example of this is the Glasgow Smart Canal project.

- ND5. Circular Economy Materials Management Facilities. Reuse of materials in replacement schemes for buildings and features can be positive in terms of the character and appearance of our places and spaces. ND5 may have a positive role to play in the availability of materials. This is important in the context of an increased focus on the reuse and maintenance of our existing assets.
- ND14. Clyde Mission. The key role that the historic environment can play in successful placemaking was noted. It was suggested that there is potential for positive effects through: promotion of proactive care; maintenance and climate change adaptation of historic environment assets; and increased understanding of and sustainable access to historic environment assets. It was suggested that these potential positive effects are most likely to be realised effectively through the integration of enhancement measures at a high level, as well as at the project level.
- ND16. Dundee Waterfront. It was noted that all zones have the potential to impact on the site and setting of historic environment assets, with the port area particularly sensitive. The port area also contains much infrastructure of historic environment interest which presents the opportunity for positive reuse.
- ND18. Stranraer Gateway. Stranraer's historic environment is a key placemaking asset and all project proposals should recognise this.

Question 61 – What are your views on the potential health effects of the proposed national developments as set out in the environmental report?

Around 35 respondents commented at Question 61, with those comments tending to be brief. They included broad notes of agreement with the potential health effects as set out, but also that positive impacts do rest on the positive environmental impacts identified being achieved.

Other general issues raised included that prioritising biodiversity and nature recovery through planning policy has immense potential for restoring human health and wellbeing. In particular, mental health within the population could really benefit if the protection and expansion of native habitats is actively demonstrated, and visible to the community. However, an alternative view was that Scottish Government energy policies are causing mental anguish for communities, who are witnessing the destruction of their precious land and seas. There was specific reference to families living near windfarms, turbine noise and flicker.

Other comments included that there should be reference to:

- The water environment. It was reported that energy, transport and some land management pollution changes and reductions could well contribute to welcome health benefits, especially in the atmospheric environment.

However, it was also suggested that the situation is much less clear for the water environment.

- The dangers of the toxic epoxy resins from turbine blades as a future unknown risk.
- The health benefits that can be achieved from e-mobility and how alternative fuels can improve air quality and health by removing internal combustion engine vehicles from the roads, in favour of more sustainable forms of transport.
- Particulate matter (PM) pollutants (both PM10 and PM2.5 sizes) largely produced by road traffic. Lack of reference to these particulates was suggested to be a major omission.

It was also noted that, in relation to Policy 10 (Sustainable transport), there is no mention of noise, and no reference is made to the Design Manual for Roads and Bridges.

In terms of specific areas, a respondent questioned whether there will be health benefits associated with plans for Aberdeen Harbour. With regard to training opportunities and employment, it was thought doubtful that people from Torry will be qualified to take advantage of these opportunities, including because the prevalence of chronic illness and mental illness is high and educational attainment relatively low. It was also suggested that health inequalities will be exacerbated by removing the community's last accessible green space.

Question 62 – What are your views on the assessment of alternatives as set out in the environmental report?

Around 30 respondents made a comment at Question 62, with comments tending to be brief. They included that the assessment is potentially very useful, or that respondents agreed with it in principle. Alternatively, it was suggested that not enough detail has been provided, that the assessment is inadequate, or is focused on the interests of the Central Belt.

There was also a view that reasonable alternatives should have been identified, particularly where adverse environmental effects are likely. For example, given that the discussion of alternatives to Policy 19 (Green energy) recognises that it is difficult to predict how impacts may differ between the proposed policy and current SPP, and that keeping the existing SPP approach would mean a greater level of protection may be afforded to sites and species, it was suggested that the existing approach should be retained.

The assessment of the alternative national developments was welcomed, although it was assumed that further assessment will consider the environmental impact of proposals in further detail.

In terms of specific alternatives that respondents wanted to see included or given greater coverage, observations included that:

- In relation to Policy 19 (Green energy) and Policy 32 (Natural places), there should be an additional alternative. This should maintain the protection of non-designated sites and species, as well as wild land, but allow specific applications to go ahead, if they can show (in a measurable way) that the climate benefits of the project would outweigh the harm, or if the harm in that particular area could be shown to be negligible.
- There should be alternatives that are in the best interest of the community, such as using the industrial estates already available, and not destroying green sites.
- There is no reference to nuclear power.
- Regarding North East Transport Investment, the potential effects on the historic environment are likely to include negative effects on the site and setting of historic assets and places from the introduction of new transport infrastructure. There will also be effects on existing historic infrastructure such as stations, bridges and access structures.
- Regarding the Climate Evolution Zone including Blindwells, Cockenzie and the ETZ, developments in this area have the potential to impact on the Inventory of Historic Battlefields site of the Battle of Prestonpans, and this is not mentioned.
- In the assessment summary covering the Ardeer Peninsula, the potential for effects on the historic environment caused by the redevelopment of the ICI complex at Ardeer should be noted.

There were also references to the potential impact on the historic environment needing to be considered in relation to: Edinburgh, East Lothian and Midlothian Innovation Zone; Freeport on the Clyde; National Low-Carbon Freight Network; West Edinburgh; Zero Carbon Innovation Zones; Lochaber Smelter; and space ports.

Parts of the assessment with which respondents disagreed, or wished to see amended, included:

- The suggestion that renewable green energy generation could lead to a negative impact on biodiversity. It was suggested that there is now ample evidence showing that solar photovoltaics increase biodiversity net gain and generate natural capital.
- The reference to the electric vehicle network refers to electric vehicles being quieter. It should be changed to state that electric vehicles are quieter when travelling at low speeds.

It was also noted that the summary assessment findings for the space industry and space ports do not include any identified effects on the historic environment, but that significant impacts have been identified in relation to historic environment assets, including scheduled monuments. It was seen as important that potential impacts on historic environment assets are considered at an early stage of project development.

Question 63 – What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

Around 35 respondents made a comment at Question 63.

While some respondents noted their agreement with the proposals for mitigation, enhancement and monitoring, others saw them as inadequate, probably unenforceable, or suggested that insufficient information has been provided.

Other comments included that there is a real danger that NPF4 will not protect and enhance biodiversity to the extent needed to deliver transformational change; without a clear mechanism for delivering enhancement, and clear wording to ensure the mitigation hierarchy is followed and protected sites are protected, the assumed mitigation is unlikely to be delivered.

An associated point was that NPF4 will be influential in determining the focus and content of LDPs as well as determining development proposals. Given this, it was described as imperative that the findings of the SEA lead to actions which are embedded in NPF4, and that the SEA is not used as a barrier to implementation but as an opportunity to incorporate strong environmental principles throughout NPF4.

With specific reference to mitigation, comments included that this should not be used as an excuse for allowing otherwise unacceptable environmental degradation or damage.

In relation to monitoring, it was suggested that the Environmental Report does not appear to set out any detailed monitoring arrangements, making it difficult to comment on the suitability of the monitoring programme. It was assumed that further information will be published at a later date.

With regard to the national developments, comments included that:

- There seems to be a lack of appreciation of the potential influence of detrimental change to biodiversity throughout the mitigation subunits. It was suggested that improvement of biodiversity should be included and inherent in any and every approach for mitigation, enhancement and monitoring of environmental effects.
- In relation to ND7 (Island Hub for Net Zero), it is doubtful that providing low carbon transport options to sites to reduce car dependency would address the most serious environmental impacts directly related to renewable energy generation, renewable hydrogen production, infrastructure and shipping, and associated opportunities in the supply chain. As such, it was questioned why it has been included under specific mitigation/opportunities for this national development in the SEA.
- In relation to ND12 (Strategic Renewable Electricity Generation and Transmission Infrastructure), there is reference to screening options being considered to minimise the visual impact of developments. It was argued that screening may be an option in some circumstances, but there will be many

developments for which siting and design will be of more relevance in minimising visual impact and this should be acknowledged.

Society and Equalities Impact Assessment

The consultation asked seven questions about the Society and Equalities Impact Assessment.

Question 64 – What are your views on the evidence and information to inform the society and equalities impact assessment?

Around 25 respondents made a comment at Question 64. General comments included that the evidence and information appear reasonable, or that the breadth and scope of the baseline information is good. However, there was also a view that the evidence and information, or the EQIA process, is not objective. It was also suggested that the recommendations within the EQIA could be more strongly reflected in NPF4's policies, for example, in relation to housing need, equality and human rights.

In terms of the assessment process, comments included that:

- The non-technical summary should be a living document, especially given the long-term nature of NPF4.
- Robust data measuring and evaluation, including an ongoing impact assessment, will allow for in-plan adjustments to particular policies found not to be meeting desired equality outcomes.

It was suggested that the Equality and Human Rights Commission's measurement framework for equality and human rights may assist both government and local authorities with the collection of equality data.

There was also a recommendation that Equality, Diversity and Inclusion (EDI) benchmarks, measures and reporting be carried out in order to track and monitor progress on EDI on an annual basis, as well as society and equalities impact assessments.

It was also suggested that, in addition to having IIAs to refer to, there would be value in the final NPF4 being accompanied by a simplified graphic that would map key provisions of NPF4 against high-level outcomes (including those derived from duties covered by the assessments); this could act as a useful reminder as to what is sought, what is aimed to be delivered and in what manner.

In relation to the evidence used, it was noted that the EQIA references a broad evidence base and cites various reports that are not referred to in the draft NPF4, including: Social Renewal Advisory Board Report (2021); Social Capital in Scotland Report (2020); Public Health Priorities in Scotland (2018); and the National Standard for Community Engagement. It was described as heartening to see that such a body of evidence has been considered, but it was noted that the

confinement of this evidence base to the EQIA requires that this be read in order for the policies in NPF4 to be understood in their entirety.

Comments about specific information used included that:

- The inclusion of Public Health Scotland evidence and comments is welcome.
- In relation to population and human health, the conditions of children and families in poverty and experiencing deprivation have worsened during the COVID-19 pandemic and it is likely that the detailed information included within the current draft is outdated.
- Evidence and information can now be drawn from the Census for Showpeople. Prior to Scottish Gypsy/Travellers receiving legal status as an ethnic group, they were treated 'as if' they had that legal status. Given that Showpeople, by virtue of being widely considered as part of a wider travelling community, experience the same social and to a lesser degree economic discrimination and disadvantages due to their lifestyle, the Scottish Government should offer a similar status. The current anomaly means that Showpeople experience similar social discrimination yet none of the protections ascribed to other communities, and this creates a vacuum in the planning process.

Finally, it was noted that while the EQIA cites a comprehensive range of evidence to show how planning may impact on protected groups, this is presented without criticism or comment, and it is therefore left up to the reader to interpret how to use this information to deliver equal outcomes for all groups.

Question 65 – Do you have any comments on the findings of the equalities impact assessment?

Around 20 respondents made a comment at Question 65.

General comments included that while it is welcome that 'improving equality and eliminating discrimination' is a stand-alone outcome of NPF4, there is also a need to apply an equality lens/priority to each of the other required high-level outcomes and the ensuing strategies, developments and policies.

It was suggested that more could be done to emphasise the cross-cutting nature of improving equality and eliminating discrimination. For example, it was suggested that most, if not all, of the actions and policies identified in the draft NPF4 can and should identify how they will support this high-level outcome. The concern was, if not considered from the outset, there is a risk that inequalities will be overlooked, reinforced, perpetuated or exacerbated at implementation stage. It was suggested that in order to move beyond 'suggestions' and 'potential', there needs to be clear evidence and strategies throughout NPF4 on how this will be achieved in practice.

Other comments and suggestions included that:

- The need to comply with the Public Sector Equality Duty should be referenced in the NPF4 and it should be made clear that the duty applies from the strategic policy level right through to the decision-making process. For example, the specific duties that require EQIAs when producing LDPs.
- Cross-cutting themes of sex, disability, race and age should be specifically considered at each stage of the planning process. Links should be made to equality-related policies nationally, regionally and locally.
- References to the Place Standard Tool are welcome, but consideration should also be given to the Health and Wellbeing Outcomes.
- NPF4 is unclear on the interplay between the policies set out in Part 3 – National Planning Policy, existing legal duties set out in the Town & Country Planning (Scotland) Act 1997, the Human Rights Act 1998 and the Public Sector Equality Duty. It would be helpful if the document set out all existing duties and made clear connections to the policies.

It was also noted that there is also currently no statutory requirement under the Equality Act 2010 for the findings for an EQIA to be actioned in practice; it is therefore crucial that the most important equalities considerations are explicitly embedded within the draft NPF4 itself, if Scotland is to achieve a more equitable future.

The recognition that there are a number of societal groups that experience challenges in both engaging with the planning system, and having the system meet their needs, was welcomed. However, there was a concern that there is a lack of consideration throughout NPF4 on how this will actually be tackled. It was suggested that it would be beneficial to understand the barriers to engagement faced by low-income households, particularly those in the priority groups, in participating in engagement on planning decisions. It was hoped that understanding these barriers, and ensuring planning authorities have the processes in place to remove them, will ensure wider engagement with these groups.

Question 66 – Do you have any comments on the findings of the children’s rights and wellbeing impact assessment?

Around 20 respondents made a comment at Question 66. General comments included that the involvement of children and young people in the preparation of NPF4 is welcome. It was also reported that Play Scotland has undertaken consultations across Scotland with children and young people which could contribute to the Children’s Rights and Wellbeing Impact Assessment (CRWIA).

There was a concern that the conclusions drawn in the CRWIA are simplistic, and that children’s human rights and wellbeing would be better protected by much more explicit mention and signposting to other relevant policy objectives, such as the SHANAARI principles (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible and Included) and Getting it right for every child (GIRFEC).

Other comments included that while the Impact Assessment includes a good range of evidence, it misses out a few key pieces of place-based research of relevance:

- The Children and Young People’s Commissioner Scotland report, ‘Scot Youth and COVID 2’. In terms of key themes set out within that report there was reference to wanting to feel safe and included, and to hearing and understanding issues in local areas and improving opportunities for all children and young people.
- A research project (yet to be published) on Enabling Independent Active Travel for Young People in Scotland (funded by Sustrans) was also reported to be highly relevant. The project included working in collaboration with young people and their parents to produce in-depth Active Travel maps.
- A Place in Childhood and Play Scotland’s evidence review for the Place Standard tool.

In terms of general issues or themes, it was suggested that the planning process can make a critical difference to tackling poverty and noted that tackling child poverty is a priority for the Scottish Government. Associated suggestions included that a greater focus on child poverty would ensure that this is given suitable priority within planning decisions; it was noted that child poverty is only mentioned once within the draft NPF4.

There was also a concern that there is no mention of UNCRC Article 15: The right to freedom of association, which includes gathering and organising their own activities in public spaces.

Question 67 – Do you have any comments on the Fairer Scotland Duty and the draft NPF4?

Around 15 respondents made a comment at Question 67, with general comments including that it is good to see the Fairer Scotland Duty reflected.

Particular aspects of the Impact Assessment that were welcomed included the recognition that income is a strong determinant for people’s ability to respond to, and recover from, climate change impacts and that our future places and spaces need to contribute to improving equality and eliminating discrimination. It was also noted that the assessment has identified a number of key policies which will help tackle inequalities and poverty, including NPF4’s spatial strategy, thematic policies and proposed national developments.

However, there was also a concern that the draft NPF4 has an urban bias, or specifically is biased towards the Lothians. There was an associated need for equality of access to services across Scotland, including through necessary and timely investment, for example in digital and transport infrastructure.

It was noted that the Scottish Government has published guidance on how to comply with the Fairer Scotland Duty, including how a ‘strategic decision’ is to be defined. The list of examples of strategic decisions includes many that are relevant to NPF4, such as the preparation of LDPs, LHSs and locality plans, and it was suggested that the need to comply with the Fairer Scotland Duty should be referenced.

Question 68 – Do you have any comments on the consideration of human rights and the draft NPF4?

Around 35 respondents made a comment at Question 68. The most frequently-made comment was that it is disappointing that there is not currently a specific Human Rights Impact Assessment. Further connected comments included that housing is a human right, but there is no reference to this in NPF4, nor any of the supporting documents. It was suggested that it is vital that Articles 17 and 25 of the Universal Declaration of Human Rights be afforded weight in the preparation of NPF4.

Other comments included that:

- The document does not specify what is encompassed by ‘human rights’. It should specifically state whether or not its definition of human rights has a linguistic basis rather than simply a cultural one.
- The consideration of human rights should include potential impacts on the Gaelic language.
- Although the draft NPF4 specifically mentions meeting the needs of disabled people, the focus appears to be only on those who are not in paid work and/or who need supported housing.
- Inflicting national policies on local communities is a violation of their human rights. It was also suggested that there is no real consideration of the human rights of the communities most affected by any developments.

Question 69 – Do you have any comments on the islands impact assessment?

Around 20 respondents made a comment at Question 69. General comments included that no consideration has been given to the island communities affected by development policies. There was specific reference to the treatment of the islanders of Orkney and Shetland, and it was suggested that there needs to be more proactive engagement with island communities about planning.

Respondents highlighted a range of issues that affect island communities, including:

- Housing, with limited opportunities for young families and for older people wishing to downsize from too-large homes into smaller, more convenient houses in less isolated places. It was noted that the lack of affordable housing is the number one challenge and this impacts on everything else, from sustainability of the local economy to the provision of essential services and the viability of school rolls.
- Childcare provision, and the need to plan for it.
- Lack of stable employment, and especially the gendered nature of work. It was suggested that there is a distinct gendered job creation approach, with

typically male industries like construction, ports and renewables being focused on.

Other comments included that it is essential to enhance the private sector economy, especially in islands, as global challenges may jeopardise overall national income and the ability to support the desired size and functions of the public sector.

Although an assessment dedicated to island communities was welcomed, it was noted that many mainland communities experience similar issues of fragility and isolation. There was a query as to how these communities might receive the dedicated focus and actions that has been applied to island communities.

In terms of the Island Communities Impact Assessment (ICIA) itself, comments included that:

- It underlines the disadvantages experienced by island communities, particularly young people, and the corresponding need to ensure that NPF4 takes due account of these.
- There is a clear and strong case for including impacts on the Gaelic language. This will require additional analysis, including of the varying degrees of use of Gaelic across Scotland's islands.

With reference to the information presented in the ICIA, comments included that it is difficult to see how it can be used to assess whether NPF4 will have significantly different effects between islands and mainland communities, and also between different island communities. There were also suggestions that the evidence base should include a number of Economic Reviews for Orkney.

Implications of Policy Changes for Island Communities

Comments about this part of the ICIA included several comments specific to Orkney, including a need to acknowledge that Orkney has a higher population density and very different settlement pattern to other island and rural areas and will require a bespoke approach appropriate to the LDP spatial strategy. It was also suggested that the ICIA and NPF4 should acknowledge differences in the demographic characteristics of island communities like Orkney, where there has been overall population growth in recent decades, but with increases and declines in certain elements of its demographic. It was argued that, to support sustainable island communities in the long term, it is particularly important to grow the population of young and working-age people and that planning policy, investment and public services and facilities need to target these particular demographic challenges. The availability of good quality affordable housing was seen as a major barrier to inward migration and economic development.

Other points raised in relation to Orkney included that:

- Agriculture and fishing form a major part of the economy, with both sectors particularly vulnerable to the consequences of EU Exit.

- Orkney has the poorest residential superfast broad band coverage in Scotland.

Potential issues and mitigation

Comments about this part of the ICIA included that island specific flexibility needs to be more clearly articulated within NPF4 planning policies, including policy provision for island planning authorities to take forward bespoke islands approaches to: the appropriate application of the 20-minute neighbourhood concept; planning for affordable housing, rural housing and rural business development; aquaculture; and coastal development.

With respect to infrastructure, it was noted that the ICIA identifies the need for adequate infrastructure for the number of tourists attracted to the islands. It was argued that Policy 31 (Rural places) should specifically identify provisions to enable development proposals that contribute towards the sustainability of tourism, such as targeted strategic investments in tourism infrastructure and the development of more small-scale facilities.

The need to provide adequate infrastructure, including harbour facilities and grid connections, to realise the transformative potential of renewable energy and zero carbon fuels was also highlighted, although it was suggested that the draft NPF4 focuses on the net zero potential of islands without adequate consideration to other island issues identified in the ICIA. Specifically in relation to Orkney, it was argued that, given the scale and positive impact of the Orkney Harbours development projects, and their ability to deliver on national priorities, it would be appropriate to include the Orkney Harbours as a stand-alone National Development in NPF4.

Finally, it was observed that the ICIA recognises that people living and working on islands are best placed to help decide how their communities can grow in a way that meets their needs, so it is essential that they are involved in planning their future development. It was suggested that this statement needs to be reinforced through NPF4 planning policies to enable island planning authorities to address island specific issues in LDPs, as well as through Local Place Plans.

Partial Business and Regulatory Impact Assessment (BRIA)

Question 70 – Do you have any comments on the partial business and regulatory impact assessment?

Around 45 respondents made a comment at Question 70.

General observations included that little tangible information on costs is provided.

A number of respondents noted their concern that the cumulative resource burden of NPF4 on planning authorities is not recognised in the Partial BRIA. The BRIA's suggestion that replacing most local policies with national planning policies will free up time and resources for local authorities to focus on spatial elements in their development plans was questioned. There was also doubt that the introduction of a MATHLR for each planning authority will reduce the workload of local authorities.

It was argued that:

- While there is always an assumption that the impact on local authorities will be cost neutral, experience shows that this is not the case and an assessment exercise setting out the financial and resource impacts for all local authorities is needed.
- Planning authorities will require additional resources, as well as investment in skills development to enable assessments to be undertaken in new work areas. NPF4 needs to be accompanied by a resource and skills plan, akin to what is being developed in England for its National Planning Framework, which sets out the resource impact and how this is to be addressed.
- The most significant impacts of limited local authority resources will be on those businesses that are dependent on the planning system for identifying new sites for their ongoing operations including house builders and developers, the renewable energy sector, digital network providers and the minerals and aquaculture sectors.

General observations about the potential impact of NPF4 on business included that:

- Paragraph 62 of the Partial BRIA does acknowledge that there are several new requirements that are likely to have cost implications for businesses. However, there remains a lack of clarity in what the details of these requirements will be.
- There should be more detailed consideration of the resources which will be required to ensure the policies designed to address the nature crisis can be fully implemented.

Impact on development

There was a concern that NPF4 in its current form could limit development, rather than enable it. Further comments included that:

- The Partial BRIA suggests that the introduction of national planning policies which form part of the development plan will provide greater certainty to developers and considerably reduce the number of occasions where they will need to engage with the planning system on the development of policies that affect their businesses. However, these benefits will only be fully realised if the national planning policies are sufficiently clear and robust.
- There remains a risk of tension between policy principles that gain support at national level but that may be challenging to implement due to local circumstances, empowering community planning, and local policy responses.
- NPF4 sets a higher bar than was previously the case regarding the allocation of sites for residential development. However, as currently written, NPF4 will not provide the certainty required for developers when developing their planning proposals.

Other specific resource implications

Respondents also identified potential resource requirements associated with delivering NPF4. These included that:

- There is no reference to additional costs that will be incurred by local roads authorities in meeting requirements set by draft NPF4 around aspects such as Local Place Plans, sustainable transport, active travel, and 20-minute neighbourhoods.
- Community wealth building is one of the policy changes highlighted in the Partial BRIA, and it is noted that this may result in potential costs to developers who are asked to contribute to community wealth building objectives. However, the policy is vague, and a more detailed policy could be useful for businesses as well as for planning authorities.
- Some of the changes introduced by NPF4 potentially create an additional imperative for Historic Environment Scotland to update, maintain and create new guidance notes to support decision-making. This is expected to have resourcing and cost implications beyond their current baseline for the maintenance of these guidance notes. Other key agencies may also need to update their national level guidance in the light of other changes throughout NPF4.
- Regarding Policy 28 (Historic assets), the general requirement for heritage assessments in support of applications which could significantly impact on historic assets, while beneficial in some circumstances, could result in increased costs for developers, and may mean that Historic Environment Scotland and planning authorities will spend more time and resource reviewing these outputs. There was a question as to whether these heritage assessments would bring significant value to the process when existing assessments already exist.
- Other aspects of the delivery of NPF4 will have resource implications for key agencies, such as Historic Environment Scotland. There was reference to engaging in the consenting processes for national developments and engaging more intensively with applicants and authorities on the reuse of our most significant places.

It was also suggested that Business and Regulatory Impact Assessments should be carried out for any unwanted compulsory purchases of Showmen's Yards.

Regulation

The intention of the Scottish Government to work with a range of stakeholders to develop an appropriate Monitoring Programme for NPF4 was welcomed, as were the references to the monitoring programme complementing, and potentially combining with, wider planning performance work including Planning Performance Frameworks and Royal Town Planning Institute work on monitoring outcomes. The production of a Post-Adoption Statement was also welcomed.

It was suggested, however, that it would have been helpful to stakeholders if some of the detailed content in the Regulatory Impact Assessment had been referenced

in the draft NPF4, particularly in relation to the overall vision to 2045 and, for example, the references to the impact of Brexit and global trends on the Scottish economy.

Annex 1 - Organisations responding to the consultation

Active Travel-related Third Sector Organisation or Campaign Group
CoMoUK
Cycling Dumfries
Cycling Scotland
Cycling UK in Scotland
Paths For All
Ramblers Scotland
Scottish Rights of Way & Access Society (ScotWays)
Spokes, The Lothian Cycle Campaign
Sustrans Scotland
City Region or Strategic Development Planning Authority
Clydeplan (Glasgow and the Clyde Valley Strategic Development Planning Authority)
Coastal Communities Network, Scotland
Edinburgh & South East Scotland City Region Deal
Community Council or Residents' Association
Ardross Community Council
Assynt Community Council
Bishopbriggs Community Council
Broom, Kirkhill and Mearnskirk Community Council
Cambusbarron Community Council
Cramond & Barnton Community Council
Culter Community Council
Cupar Development Trust
Dalry Community Council
Durness Community Council
Fossoway and District Community Council
Gartcosh Tenant and Residents Association
Grangemouth incl. Skinflats Community Council
Grassmarket Residents' Association
Hillhead Community Council
Isle of Mull Community Council
Jackton & Thorntonhall Community Council
Joint Forum of Community Councils in West Lothian

Kemback Pitscottie and Blebo Community Council
Kilmacolm Residents' Association
Kilmun Community Council, Argyll
Kingseat Community Council
Kintore and District Community Council
Kirkmahoe Community Council
Leith Harbour and Newhaven Community Council
Liberton & District Community Council
Linlithgow and Linlithgow Bridge Community Council
Maybole Community Council
Mid Deeside Community Council
Midlothian Federation of Community Councils
Monkton Community Council
Mount Vernon Community Council
New Town & Broughton Community Council
Newtonhill, Muchalls & Cammachmore Community Council
Northern Corridor Community Forum
Stepps and District Community Council
Symington Community Council
The Royal Burgh of Forfar Community Council
Tiree Community Council
West Kilbride Community Council
Westhill and Elrick Community Council
Culture or Heritage Company, Association, Trust or Representative
American Cultural Resources Association
AOC Archaeology Group
Archaeology Scotland
Architectural Heritage Society of Scotland
Association of Local Government Archaeological Officers
Battle of Prestonpans [1745] Heritage Trust
Biggar and District Civic Society
Chartered Institute for Archaeologists
Creative Lives
Culture Counts

Dundee Civic Trust
Historic Houses
Museums Galleries Scotland
Music Venue Trust
Scottish Strategic Archaeology Committee
Shetland Amenity Trust
Society of Antiquaries of Scotland
The Cockburn Association
The Federation of Archaeological Managers and Employers
The National Trust for Scotland
The Scottish Civic Trust
Theatres Trust
Development, Property or Land Management Company or Representative Body
A & J Stephen (Builders)
Allan Water Homes Limited
Avant Homes (Scotland)
Bancon Homes
Banks Group Ltd
Barratt & David Wilson Homes North Scotland
Barratt David Wilson Developments (East Scotland)
Barratt David Wilson Developments (Scotland Region)
Barratt Homes West Scotland
Bellway Homes
Bellway Homes East Scotland
Burness Paull LLP
Cala Homes (East) Limited
CALA Homes (West) Limited
CALA Homes North Ltd
Campion Homes Ltd
Cape Marco Ltd (Company No.12373899)
CHAP Group (Aberdeen) Ltd
Crosswind Developments Ltd
Cruden Homes (West) Ltd
D J Laing Homes Limited

Dandara East Scotland Limited
Dawn Homes
Dundas Estates and Development Company Limited
E&A Partnerships Ltd
Ediston Homes Ltd
Elan Homes (Scotland) Ltd
Gladman Developments Limited
Global Mutual
Guild Homes (Tayside) Limited
Hadden Homes
Hallam Land Management
Hargreaves Land
Headon Developments Limited
Home Group Limited
Homes for Scotland
Kirkwood Homes Limited
Lovell Partnerships
Mactaggart & Mickel
Malcolm Allan Housebuilders Ltd
McTaggart Construction Ltd
Midsteeple Quarter
Miller Homes Ltd
Moda Living
Montagu Evans LLP per The University of Edinburgh
Morris Leslie Group
NPL Group
Ogilvie Homes
Orchard Brae Ltd.
Pat Munro Alness Limited
Paul Traynor Panacea Homes
Peel L&P
Peel NRE Limited
Persimmon Homes
Ravenscraig Limited

RDK Construction Ltd
Robertson Living Limited
Robertson Residential Group
Ryden LLP
Savills
Scotia Homes Ltd
Scottish Land & Estates
Scottish Property Federation
SGN Place Limited and SGN Commercial Services Limited
Shawfair LLP
Sovereign Centros
Springfield Partnerships
Springfield Properties North
Springfield Properties PLC
Stewart Milne Homes
Stirling Developments Limited
Taylor Wimpey (East Scotland)
Taylor Wimpey (West Scotland)
Taylor Wimpey and Hallam Land Management Ltd
Tulloch Homes Limited
Turnberry Homes Ltd
Unite Group Plc
Walker Group
Watkin Jones Group PLC
West Town Edinburgh Ltd
Whiteburn Projects Ltd
Winchburgh Developments Limited
Energy-related Supplier, Developer, Association or Body
3R Energy Ltd
Abei Energy Group Ltd
Ampyr Energy UK Developments
Association for Decentralised Energy
BayWare. UK Ltd
Belltown Power UK

Community Energy Scotland
Community Power Outer Hebrides
Community Windpower Ltd
Coriolis Energy
Drax Group
EDF
EDP Renewables
Electricity Supply Board (ESB)
Energiekontor UK Ltd
Energy Transition Zone Ltd
Ennoviga Solar Ltd
ERG UK
European Marine Energy Centre (EMEC) Ltd
Force 9 Energy
Fred. Olsen Renewables
GreenPower International Ltd
GRIDSERVE Sustainable Energy Ltd
Hitachi Energy
Inch Cape Offshore Limited
INEOS FPS Ltd
Infinergy & Boralex
Jura Wind Ltd
Low Carbon Wind Development Co Ltd
MCS Charitable Foundation
MERED Limited (renewable energy developer)
Muirhall Energy
National Grid Gas Transmission
Ocean Winds UK
Orsted
Red Rock Power Limited
RenewableUK
RES
RWE
Scottish Power Energy Networks Holdings Limited

Scottish Renewables
ScottishPower Renewables
SGN
Shell UK Limited
Solar Energy Scotland
Solar2 Limited
SSE Renewables
SSE Thermal
SSEN Transmission
Statera Energy
Statkraft UK Limited
Teindland Wind Farm Ltd
The Farm Energy Company
The Orkney Renewable Energy Forum
Uniper
Ventient Energy
Wind2 Limited
WKN GmbH
Environment or Natural Heritage-related Third Sector Organisation or Campaign Group
Aberdeen Climate Action CIC
Badenoch & Strathspey Conservation Group
Biofuelwatch
Buglife - The Invertebrate Conservation Trust
Cairngorms Campaign
CATES
Community of Arran Seabed Trust (COAST)
Community Woodlands Association
Deeside Climate Action Network (CAN)
Dovesdale Action Group
F.R.I.E.N.D.S. (For Real Issues Environment Nature Disabled Stevenston)
Fields in Trust
Friends of St Fittick's Park
Friends of the Earth Scotland

Friends of the Earth Tayside
Galloway and Southern Ayrshire UNESCO Biosphere
Galloway National Park Association
Green Action Trust
Greenspace Scotland
Iona Community Environmental Network
John Muir Trust
Keep Potterton Green
Missing Salmon Alliance
Mountaineering Scotland
North East Mountain Trust
Plantlife International
Reforestation Scotland Thousand Huts
RSPB Scotland
Scottish Badgers
Scottish Biodiversity Information Forum (SBIF)
Scottish Environment LINK
Scottish Geology Trust
Scottish Rewilding Alliance
Scottish Wild Land Group
Scottish Wildlife Trust Aberdeen & Aberdeenshire Local Group
Scottish Wildlife Trust, Ayrshire Group
ScrapAntics CIC
South Seeds
SWT Lothians Group (Planning Team)
The Association for the Protection of Rural Scotland
The Scottish Wildlife Trust
Transition Edinburgh [who organised a community consultation from which this response is drawn]
Woodhall, Faskine and Palacecraig Conservation Group
Woodland Crofts Partnership
Woodland Trust Scotland
Zero Waste Scotland

Housing Association
Castle Rock Edinvar (trading as Places for People Scotland)
DGHP part of the Wheatley Group
Home in Scotland
Lochalsh & Skye Housing Association
Ore Valley Housing Association
Scottish Borders Housing Association
Tshousing
Local Authority
Aberdeen City Council
Aberdeenshire Council
Angus Council
Argyll and Bute Council
City of Edinburgh Council
Clackmannanshire Council
Comhairle nan Eilean Siar
COSLA
Dumfries and Galloway Council
Dundee City Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
East Renfrewshire Council
Falkirk Council
Fife Council
Glasgow City Council
Improvement Service
Inverclyde Council
Midlothian Council
Moray Council
North Ayrshire Council
North Lanarkshire Council
Orkney Islands Council
Perth and Kinross Council

Renfrewshire Council
Scottish Borders Council
Shetland Islands Council
SOLACE Scotland
South Ayrshire Council
South Lanarkshire Council
Stirling Council
Tayside RSS local authorities
The Highland Council
The Society of Local Authority Lawyers and Administrators in Scotland
West Dunbartonshire Council
West Lothian Council
NHS
NHS Fife
NHS Forth Valley
NHS Grampian
NHS Greater Glasgow & Clyde
NHS Tayside
Public Health Department NHS Fife
Public Health Scotland
Scottish Directors of Public Health Group (SDsPH)
The Scottish Ambulance Service
Other
The Religious Society of Friends (Quakers in Scotland)
West Fife and Coastal Villages SNP branch
Other Infrastructure-related Company or Representative Body
Cellnex UK
EQUANS UK and Ireland
Mobile UK
Openreach
RPM (REG Power Management Limited)
Scottish Environmental Services Association
Scottish Water.
Storegga

The Metropolitan Glasgow Strategic Drainage Partnership
Other Private Sector
Airbnb
Aldi Stores Ltd
Ballogie Estate Enterprises
Bourne Leisure Limited
Cooke Aquaculture Scotland Ltd
Dobbies Garden Centres Ltd
EPC-UK
Flood Re
Lidl Great Britain Ltd
Loch Duart Ltd
Marks and Spencer plc
McDonald's Restaurants Ltd
Mowi Scotland
North West Highlands Geopark Ltd
Scottish Salmon Company
Scottish Sea Farms
Scottish Stone Group
Stora Enso
Tesco Stores Limited
The Sub Club, King Tuts Wah Wah Hut, SWG3, Barrowland Ballroom, 02 ABC & 02 Academy.
TWUK Ltd.
Welbeck Estate
Other Representative Body, Faculty, Network
Aberdeenshire Local Outdoor Access Forum
Association of British Insurers
Association of Scotland's Self-Caterers
Botanical Society of Britain and Ireland Committee for Scotland
British Holiday & Home Park Association (Scotland)
Chartered Institute of Ecology and Environmental Management (CIEEM)
CIHT
CIWM Scotland

Committee of the Faculty of Public Health in Scotland
Community Transport Association
Confederation of Passenger Transport Scotland
Confor
Conservation Officers Group
DTA Scotland
Edinburgh Chamber of Commerce
Federation of Small Businesses
Glasgow Chamber of Commerce
Health and Social Care Alliance Scotland
Institute of Acoustics
Law Society of Scotland
Mineral Products Association (Scotland) Ltd
NFU Scotland
Royal Environmental Health Institute of Scotland
Royal Yachting Association Scotland
Salmon Scotland
Scottish Agritourism
Scottish Chambers of Commerce
Scottish Community Alliance
Scottish Flood Forum
Scottish Grocers' Federation
Scottish Out of School Care Network
Scottish Retail Consortium
Scottish Sports Association
Scottish Tree Officers Group
Scottish Women's Convention
Stirling Area Access Panel SCIO
SURF - Scotland's Regeneration Forum
The Association of Environmental Clerks of Works
The Mobility and Access Committee for Scotland
Transform Scotland
Planning, Architecture or Housing Representative Body or Campaign
Built Environment Forum Scotland

CIH Scotland
Communities Housing Trust
Heads of Planning Scotland (HOPS)
Housing and Place Delivery Forum
Institution of Civil Engineers Scotland
Landscape Institute
Paradigm Asset Management Group Ltd
PAS (Planning Aid Scotland)
Planning Democracy
Royal Institution of Chartered Surveyors (RICS)
RTPI Scotland
Rural Housing Scotland
Scotland's Landscape Alliance
Scottish Crofting Federation
Scottish Federation of Housing Associations
Spatial Planning, Health and Wellbeing Collaborative
The Chartered Institute of Building
The Industrial Communities Alliance Scotland
The Royal Incorporation of Architects in Scotland (RIAS)
The Scottish Housing with Care Task Force
Planning, Development, Architectural or Environmental Consultancy
Aquatera Ltd
ASH Design + Assessment Limited.
Assemble Collective Self Build
Aurora Planning Limited
Barton Willmore
BiGGAR Economics
David Bell Planning Limited
Derek Scott Planning
Ferguson Planning
Halliday Fraser Munro
Holder Planning
Marcus Trinick QC
Meicplan.associates

ORS Plc
Pegasus Consultancy Ltd
Rick Finc Associates
Ristol Consulting Limited
Scottish Futures Trust
Shepherd and Wedderburn LLP
Wright Planning & Development Ltd
Public Body, Commission or Taskforce
Architecture and Design Scotland
Bòrd na Gàidhlig
Cairngorms National Park Authority
Climate Change Committee
Creative Scotland
Crown Estate Scotland
Equality and Human Rights Commission
Food Standards Scotland
Highlands and Islands Enterprise
Historic Environment Scotland
Key Agencies Group
Loch Lomond and Trossachs National Park Authority
Ministry of Defence
NatureScot
Nuclear Decommissioning Authority
Scottish Enterprise
Scottish Environment Protection Agency
Scottish Land Commission
South of Scotland Enterprise (SOSE)
Sportscotland
The Coal Authority
VisitScotland
Regeneration or Planning Partnership or Trust
ASPIRE Orkney Ltd
Astley Ainslie Community Trust
Ayrshire Growth Deal

Caithness and North Sutherland Regeneration Partnership
Central Scotland Green Network Partnership Group
Climate Ready Clyde
Clyde Marine Planning Partnership
Coalfields Regeneration Trust
Crichton Carbon Centre, Southern Uplands Partnership and the Heather Trust (joint submission)
Inner Forth Futures
NorthWest2045 www.northwest2045.scot
Opportunity Cromarty Firth (consortium)
Research, Academic Group or Think Tank
British Geological Survey
Dynamic Coast
Forest Policy Group
Glasgow Centre for Population Health
Hydro Nation Chair Research and Innovation Programme
Royal Botanic Garden Edinburgh
Scottish Carbon Capture & Storage (SCCS)
SPECTRUM
The Royal Society of Edinburgh
UK Green Building Council (Scotland)
University of Groningen
University of Strathclyde (Sustainable Strathclyde)
School or Nursery
Carnock Primary School
KLAS Care C.i.C
Larbert Village Primary School
Musselburgh Burgh Primary School
Ravenswood Primary School
South Morningside Primary School
Tomintoul Nursery
Third Sector, Community or Campaign Organisation
A Place in Childhood
Age Scotland

Asthma + Lung UK Scotland
Campaign for Borders Rail
Child Poverty Action Group in Scotland
Children in Scotland
Community Central Hall
Community Land Scotland
Corra Foundation
Edinburgh Poverty Commission
Foundation Scotland
Galloway Mines Action Group
Highland Good Food Partnership
Includem
Inclusion Scotland
Inverkeithing Trust
MND Scotland
Nourish Scotland
Obesity Action Scotland
OneKind
Parenting across Scotland
PLACE Edinburgh
Play Scotland
Revitalise Moniaive
RoSPA
Save Shetland
Scotland Against Spin
Scottish Community Development Centre
Scottish Mediation
Scottish Obesity Alliance
Scottish Older People's Assembly
Scottish Rural Action
Shelter Scotland
South Lanarkshire Good Food Forum
South of Scotland Community Housing (SOSCH)
The British Horse Society

The Community Growing Forum
Third Sector Dumfries and Galloway
Voluntary Health Scotland
Transport Partnership
Nestrans
South East of Scotland Regional Transport Partnership (SEStran)
Strathclyde Partnership for Transport
Tayside and Central Regional Transport Partnership (Tactran)
The Joined Regional Transport Partnership
ZetTrans
Transport-related Body, Association or Provider
Aberdeen Harbour Board
AGS Airports Limited
Airlines UK
Airport Operators Association
British Aviation Group
Clydeport Operations Ltd
Forth Ports Limited
Fraserburgh Harbour
Lichfields on behalf of Edinburgh Airport Limited
Network Rail Infrastructure Ltd
Orkney Islands Council: Orkney Harbour Authority
Society of Chief Officers of Transportation in Scotland (SCOTS)
UK Major Ports Group



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The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-80435-793-4 (web only)

Published by The Scottish Government, October 2022

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1131042 (10/22)

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