



# Scotland 2045

Scotland's Fourth National  
Planning Framework: Draft

**Integrated Impact Assessment  
Society and Equalities Impact  
Assessment**

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# 1. Introduction

## 1.1 National Planning Framework 4

The Scottish Government is reviewing its National Planning Framework (NPF), a long term plan for Scotland that sets out how the Scottish Government's approach to planning and development will help to achieve a net-zero, sustainable Scotland by 2045.

The current National Planning Framework (NPF3<sup>1</sup>) was published in 2014 and will remain in place until a fourth NPF (NPF4) is adopted. NPF4 will guide spatial development, set out Scotland's national planning policies, and will designate certain developments or classes of development as 'national developments'<sup>2</sup> for which Ministers have established a need in principle.

NPF4 will have the same status as the local development plan for planning purposes. This means that its policies should inform day-to-day decision making in the planning system. It will also guide Local Development Plans and will be relevant to regional spatial strategies and important for communities as they develop their Local Place Plans. The Draft NPF4 takes into account indicative regional spatial strategies prepared by local authorities, ahead of new provisions in the Planning (Scotland) Act 2019 on regional spatial strategies coming into effect.

NPF4 will align with the Scottish Government's wider programmes and strategies, including on infrastructure, climate change and economic investment, and will address 6 statutory high level outcomes:

- Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people
- Improving the health and wellbeing of people living in Scotland
- Increasing the population of rural areas of Scotland
- Improving equality and eliminating discrimination
- Meeting any targets relating to the reduction of emissions of greenhouse gases
- Securing positive effects for biodiversity.

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<sup>1</sup> [National Planning Framework 3 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-3/pages/1-introduction.aspx)

<sup>2</sup> [national-developments-factsheet-2020-november.pdf \(transformingplanning.scot\)](https://www.gov.scot/publications/national-developments-factsheet-2020-november/pages/1-introduction.aspx)

## **1.2 What is Integrated Impact Assessment and how is this being undertaken?**

It is important to understand and take into account the impact of policies and proposals as they are developed. A range of Impact Assessments have informed the Draft NPF4. As far as possible, we have integrated these assessments into the plan preparation process. We have also co-ordinated evidence gathering and assessment stages where relevant, sharing information and links between the different assessment topics and making connections.

## **1.3 What is an Equalities Impact Assessment (EQIA)?**

The public sector equality duty requires the Scottish Government to assess the impact of applying a proposed new or revised policy or practice. Equality legislation covers the characteristics of: age, disability, gender reassignment, sex including pregnancy and maternity, race, religion and belief, and sexual orientation.

An EQIA aims to consider how a policy (a policy can cover: activities, functions, strategies, programmes, and services or processes) may impact, either positively or negatively, on different sectors of the population in different ways.

The Equality Act 2010 harmonised existing equality legislation and includes a public sector duty ('the Duty') which requires public authorities to pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation or any other prohibited conduct;
- Advance equality of opportunity; and
- Foster good relations between different groups – by tackling prejudice and promoting understanding.

The EQIA has considered the potential impacts of introducing the Draft NPF4 on each of the protected characteristics. The provisions and how they may impact on people across the protected characteristics are set out in Appendix A.

Whilst there is not currently a specific Human Rights Impact Assessment, human rights considerations should be embedded throughout the policy making process. These considerations accompany the EQIA in Appendix A.

## **1.4 What is the Child Rights and Wellbeing Impact Assessment (CRWIA)?**

The Child Rights and Wellbeing Impact Assessment (CRWIA) is used to identify, research, analyse and record the impact of a proposed policy on children's human rights and wellbeing. CRWIA helps the Scottish Government consider whether it is: advancing the rights of children in Scotland; and protecting and promoting the wellbeing of children and young people.

CRWIA is a Ministerial duty under the Children and Young People (Scotland) Act 2014 and in relation to the United Nations Convention on the Rights of the Child (UNCRC).

The CRWIA can be found in Appendix B of this report.

### **1.5 What is the Fairer Scotland Duty (FSD) assessment?**

The aim of the Fairer Scotland Duty is to help the public sector to make better policy decisions and deliver fairer outcomes. The duty focuses on socio-economic inequality issues such as low income, low wealth, and area deprivation.

The duty is set out in legislation as Part 1 of the Equality Act 2010, and came into force in Scotland from April 2018.

The legislation requires Scottish Ministers (and named public bodies) to actively consider what more can be done to reduce the 'inequalities of outcome' caused by 'socio-economic disadvantage' when making 'strategic decisions'.

The Fairer Scotland Duty assessment can be found in Appendix C of this report.

### **1.6 What is the Island Communities Impact Assessment (ICIA)?**

An Island Community Impact Assessment (ICIA) tests any new policy, strategy or service which is likely to have an effect on an island community which is significantly different from the effect on other communities. This became a legal duty in December 2020 under the Islands (Scotland) Act 2018.

The Islands Community Impact Assessment can be found in Appendix D of this report.

### **1.7 The assessment approach**

In January 2020 we published our NPF4 Integrated Impact Assessment Screening/ Scoping Report<sup>3</sup>. It signalled that the Scottish Government intended undertaking an EQIA, CRWIA, and ICIA, and would have due regard to issues arising pertaining to Human Rights matters and through the Fairer Scotland Duty, within the NPF4 preparation process. We also set out the initial evidence base on the potential impacts of policies. An update on the Integrated Impact Assessment was published in November 2020<sup>3</sup> alongside the NPF4: Position Statement<sup>4</sup>. Consultees were asked if they had any comments on this Update Report.

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<sup>3</sup> [www.transformingplanning.scot](http://www.transformingplanning.scot)

<sup>4</sup> <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/documents/>

Relatively few comments were received on the Update Report, albeit a number of respondents expressed broad support. This included welcoming engagement with Public Health Scotland to inform the assessments. Other comments and queries included:

- More detail about the impact assessment process would be welcome, including whether assessments will be based on national or regional data. It was suggested that national-level data could miss or conceal local issues and that regional and locally granular data be used as far as possible.
- Flexibility will be needed, as technologies and needs will change quickly; a 'change mechanism' would be appropriate.
- Health effects must be examined. Public health considerations should be embedded into the plan making process and emerging data on the COVID-19 pandemic should be taken into account.

Due to the differing reporting requirements, we are presenting the outputs in separate appendices. However, the next section provides an overview of the key findings from the society and equalities assessments.

## 2. Assessment findings

### 2.1 Summary of assessment findings

Planning is concerned with the creation of better places. The purpose of planning is to manage the development and use of land in the long term public interest. The Scottish Government recognises that the impacts of the policies in the Draft NPF4 have the potential to fall differentially on different groups in society. The evidence would suggest that women, people with disabilities, older people, children and young people and Black and Minority Ethnic groups for example, experience a variety of challenges in both engaging with the planning system, and having the system meet their needs. Levels of perceived influence over local decision making have been consistently low over recent years, and across all subgroups of the population.

Around four per cent of people in Scotland are from minority ethnic groups - council areas with large cities have the highest proportion of their population from a minority ethnic group. People from minority ethnic (non-white) groups are more likely to be in relative poverty after housing costs, compared to those from the 'White - British' group. Just over half of Scotland's population identifies as following a Christian Religion. Scotland's communities of identity are important and more needs to be done to tackle the inequalities faced by them.

Approximately 19% of Scotland's population lives in relative poverty after housing costs. Some types of households with children are known to be at a particularly high risk of poverty. These include households with single parents, three or more children, disabled household members, of a minority ethnic background, with a child aged under one, or a mother aged under 25. The Scottish Index of Multiple Deprivation is the Scottish Government's official tool to identify areas of multiple deprivation in Scotland, with the most deprived areas located predominantly in cities and towns.

Improving equality and eliminating discrimination across Scotland is another of the six high level outcomes of NPF4.

Both the Equality Impact Assessment and the Child Rights and Wellbeing Assessment consider key areas such as: participation, housing and accommodation, spaces and places, connectivity and health and wellbeing. The EQIA also considers issues around human rights.

Planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality. The focus proposed in Draft NPF4 on engagement is for parties to have a responsibility to consult and engage others collaboratively, meaningfully and proportionately.

The draft spatial strategy recognises that our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Direct benefits could help us to be healthy and active, creative and diverse, so that people grow up loved, safe and respected, and realise their full potential. Draft NPF4 also recognises the important role that planning can play in tackling some of the drivers of child poverty.

Draft NPF4 also includes land use planning policies on key issues supporting island communities' lives such as: engagement, local living, housing, spaces and places, rural and coastal policies, health and wellbeing and connectivity.

Scotland's north and west coast and islands have been identified as being at the forefront of our efforts to reach the Scottish Government's target of net zero emissions by 2045. Draft NPF4 provides for a specific spatial strategy which recognises the diversity of this area, from Shetland and Orkney in the north, to the Outer and Inner Hebrides and the coastal areas of Argyll and Bute and Highland. It also includes a proposed national development focussing on the norther and western isles of an Islands Hub for Net Zero.

From the evidence set out so far, the main potential issues for island communities appear to be a lack of:

- support for young people to remain, move or return to the islands;
- employment, training and higher education opportunities;
- access and affordability to transport;
- a variety of housing types, sizes and tenures to meet people's needs and a lack of affordable housing;
- speed and reliability of internet/phone connections;
- influence over decisions made by local and national government; and
- adequate infrastructure for the number of tourists attracted to the islands.

NPF4 will seek to tackle these issues through the spatial strategy and thematic policies while providing flexibility at the local development plan stage for local and specific island circumstances to be recognised.

Improving the health and wellbeing of the people of Scotland is one of the six high level outcomes of the Draft NPF4. Planning and places play a crucial role in supporting health and physical activity, for example with the Scottish Government's support for 20 Minute Neighbourhoods, high quality greenspace, active travel and in managing access to food, food production, community growing, etc.

Planning and places play a crucial role in supporting health and physical activity. On a range of indicators people who live in deprived areas are faring worse than those in less deprived areas, these include being: less likely to have access to greenspace; made visits to the outdoors; or living within 500 metres of vacant and derelict land and properties. Approximately 30 per cent of adults report having a long-term physical or mental health condition.

Societal challenges include long standing inequalities, including for health and wellbeing. The COVID-19 pandemic has left a complex and far reaching social legacy. The pandemic has affected people's mental health, with women, young



people and young carers, minority ethnic groups and those with an existing health diagnosis reporting greater impacts. Existing job market inequalities have been reinforced with women, disabled people and minority ethnic people (particularly minority ethnic women) facing persistent employment and pay gaps. Those in precarious employment, carers and lone parents, the majority of whom are women, have also experienced disproportionate impacts.

The focus provided in the Draft NPF4 to address the climate emergency and nature crisis, should also lead to health and wellbeing improvements, both physical and mental, and to resilient communities. For example, through supporting a transition to renewable and low carbon energy generation, high quality green and open spaces and consideration to the increased risks of climate change, such as flooding and sea level rise.

Outdoor spaces for play, sport and recreation can make a significant contribution towards creating more liveable and healthier places and are important for physical and mental health and overall wellbeing. For example, children experience a range of health, wellbeing and educational benefits from outdoor play, and learning in, and connecting with nature. Direct benefits could arise where a key consideration of the planning system is infrastructure to meet the diverse needs of the population or an area, for example, improved availability and access to health and social care facilities. Wider benefits could also arise from improved levels of social interaction and sense of place. Potential benefits should also arise where multiple benefits are achieved. For example, a new focus on the prioritisation and re-use of vacant and derelict land and properties, could also support the wider ambitions of Draft NPF4, to support improved community resilience, town centre regeneration, habitat enhancement and reduce pressure on natural resources.

Providing quality opportunities for children of all ages to play will benefit their physical and cognitive development, and uphold their right to engage in play and recreational activities. The planning system should support development that expands opportunities for play in the public realm and in a range of different types of open and green spaces, and which addresses unequal access to play spaces and facilities.

The Draft NPF4 also includes a proposed policy which does not support development proposals where significant adverse health effects are likely to occur. It also proposes that a health impact assessment will be required for all proposed development that is considered likely to generate significant health effects or is within the categories of national developments, or major developments, or is development subject to Environmental Impact Assessment. Development proposals that would have a significant adverse effect on air quality would also not be supported through proposed draft policy.

In response to issues around food deserts, and lack of access to healthy food especially in some deprived areas, Draft NPF4 contains a new policy on neighbourhood shopping. Draft NPF4 highlights consideration should be given to where a retail proposal will alleviate a lack of convenience goods/fresh healthier food and drink provision, especially in disadvantaged or remoter areas.

### 3. Mitigation, enhancement and monitoring

Recommendations for mitigation are contained within the individual assessments. Policy areas of particular focus include: participation, housing and accommodation, spaces and places, connectivity (both transport and digital), plus on health and wellbeing.

The Scottish Government has committed to working with a range of stakeholders to develop an appropriate monitoring programme for NPF4 that allows us to assess progress and take action where required. Monitoring will be required at both a national and local level and will be proportionate and effective.

An agreed monitoring programme will complement, and potentially combine, wider planning performance work including Planning Performance Frameworks and Royal Town Planning Institute work on monitoring outcomes, as well as reflecting national outcomes set out in the National Performance Framework<sup>5</sup>.

### 4. Next steps

The consultation on Draft NPF4 closes on 31 March 2022. Following the consultation and the end of the Parliamentary scrutiny process, we will analyse the responses and produce a final NPF4. The final adoption date will depend on the approval of NPF4 by the Scottish Parliament, but we are currently aiming to lay a finalised version for approval by summer 2022.

We will then publish a Post-Adoption Statement. The Statement will reflect on the views provided on the findings of the assessment and the proposals in the draft NPF4, and will explain how the comments received were taken into account.

### 5. How to comment

Details on how to comment can be found on the Scottish Government's Consultation Hub, Citizen Space at <http://www.consult.gov.scot>. You can also request a hard copy of this report and consultation documents at [scotplan@gov.scot](mailto:scotplan@gov.scot).

If you are unable to respond using our consultation hub, please complete a Respondent Information Form and return it, together with your response to [scotplan@gov.scot](mailto:scotplan@gov.scot) or by mail to:

National Planning Framework Team

Planning and Architecture Division

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<sup>5</sup> [National Performance Framework | National Performance Framework](#)

Area 2F South

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Consultees may wish to consider the following questions:

64. Society and Equalities Impact Assessment. What are your views on the evidence and information to inform the society and equalities impact assessment?

65. Society and Equalities Impact Assessment. Do you have any comments on the findings of the equalities impact assessment?

66. Society and Equalities Impact Assessment. Do you have any comments on the findings of the children's rights and wellbeing impact assessment?

67. Society and Equalities Impact Assessment. Do you have any comments on the fairer Scotland duty and the Draft NPF4?

68. Society and Equalities Impact Assessment. Do you have any comments on the consideration of human rights and the Draft NPF4?

69. Society and Equalities Impact Assessment. Do you have any comments on the islands impact assessment?

# Appendix A. Equalities Impact Assessment

## A.1. Executive Summary

This Equality Impact Assessment (EQIA) has considered the potential impacts of the policies contained in draft National Planning Framework 4 (NPF4). How the policies may impact on people across the protected characteristics are set out under Key Findings.

The Scottish Government recognises that the impacts of the policies in Draft NPF4 have the potential to fall differentially on different groups in society. The evidence would suggest that women, people with disabilities, older people, children and young people and Black and Minority Ethnic groups for example, experience a variety of challenges in both engaging with the planning system, and having the system meet their needs. These may relate to the provision of appropriate accommodation or housing, physical mobility and access to and through places, plus the impact of these issues on their ability to contribute to society and feel safe.

The EQIA would suggest that there may be the potential for NPF4 to:

- remove or minimise disadvantages suffered by people due to their protected characteristics
- meet the needs of people from protected groups where these are different from the needs of other people
- encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

## A.2. The Scope of the EQIA

Planning is concerned with the creation of better places. The purpose of planning is to manage the development and use of land in the long term public interest. Where anything which: (a) contributes to sustainable development; or (b) achieves the national outcomes (within the meaning of Part 1 of the Community Empowerment (Scotland) Act 2015), is to be considered as being in the long term public interest.

The NPF4 must also address six high level outcomes which to differing degrees have an impact on the scope of this EQIA. These outcomes are:

- a) meeting the housing needs of people living in Scotland including, in particular, the housing needs of older people and disabled people,
- b) improving the health and wellbeing of people living in Scotland,
- c) increasing the population of rural areas of Scotland,
- d) improving equality and eliminating discrimination,

- e) meeting any targets relating to the reduction of emissions of greenhouse gases, and
- f) securing positive effects for biodiversity.

The Scottish Government's Planning and Architecture Division has published<sup>1</sup> information about the ways it contributes to the National Outcomes. The Scottish Government envisages that these policies therefore have the potential to affect all those who live, work, or do business in Scotland not only now, but out to 2045.

As noted in the Equality and Fairer Scotland Budget Statement (2021)<sup>2</sup>, 'the norms and standards contained in international human rights conventions include not only the civil and political rights found in the European Convention of Human Rights – such as the rights to freedom of expression; a fair trial; privacy; and non-discrimination – but also economic, social and cultural rights.

For example, everyone in Scotland has the right to an adequate standard of living, including both adequate housing and adequate food. Other key rights include the right to the highest attainable standard of physical and mental health; to education; to social security; and to fair employment, as well as the right to take part in cultural life. United Nations treaties also provide specific rights and protections against discrimination in the enjoyment of a wide-range of human rights for women, children, disabled people, and ethnic, religious and other minorities. Human Rights issues are therefore considered as part of this EQIA.

Potential effects on children and young people are to be found in the linked Child Rights and Wellbeing Impact Assessment in Appendix B. A consideration of socio-economic impacts are to be found in the Fairer Scotland Duty assessment in Appendix C.

### **A.3. Key Findings**

#### **Overview**

It is clear that people wish to engage in shaping the places in which they stay and that such engagement can lead to better outcomes for people. But also, that different groups in society have different levels of engagement with the planning system, and a range of needs which require to be reflected.

The World Bank's Handbook for Gender-Inclusive Urban Planning Design<sup>3</sup> (2020) notes that 'urban planning and design shape the environment around us – and that

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<sup>1</sup> [National Outcomes: planning and architecture contribution - gov.scot \(www.gov.scot\)](https://www.gov.scot/national-outcomes-planning-and-architecture-contribution)

<sup>2</sup> [Equality and Fairer Scotland Budget Statement 2021-22 \(www.gov.scot\)](https://www.gov.scot/equality-and-fairer-scotland-budget-statement-2021-22)

<sup>3</sup> [Handbook for Gender-Inclusive Urban Planning and Design \(worldbank.org\)](https://www.worldbank.org/handbook-for-gender-inclusive-urban-planning-and-design)

environment, in turn, shapes how we live, work, play, move, and rest.’ It suggests that, in general, ‘cities work better for heterosexual, able-bodied, cisgender men<sup>4</sup> than they do for women, girls, sexual and gender minorities, and people with disabilities.’

Recently, *If not now, when? - Social Renewal Advisory Board report*<sup>5</sup> (2021) called on the public sector to give more control to people and communities over the decisions that affect their lives. In addition, *The Social Capital in Scotland: Report*<sup>6</sup> (2020) also noted that levels of perceived influence over local decision making have been consistently low over recent years, and across all subgroups of the population.

The analysis<sup>7</sup> of the responses to the NPF4: Position Statement reflects a keen interest in how planning can create better places. There was broad support for:

- The general direction of NPF4 and the ambition for climate change to be the overarching priority.
- Embedding UN Sustainable Development Goals and Scotland's national outcomes.
- The four key outcomes (net zero emissions, resilient communities, wellbeing economy, and better, greener places) set out in the Position Statement.
- Focus on the Place Principle.

The Scottish Government has recently published its *Covid Recovery Strategy: For a fairer future*<sup>8</sup> (2021). Though not making a direct link to Draft NPF4, it noted a number of relevant issues and evidence:

- The pandemic has also affected people’s mental health, with women, young people and young carers, minority ethnic groups and those with an existing health diagnosis reporting greater impacts.
- Existing job market inequalities have been reinforced, with women, disabled people and minority ethnic people (particularly minority ethnic women) facing persistent employment and pay gaps. Those in precarious employment,

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<sup>4</sup> Denoting or relating to a person whose sense of personal identity and gender corresponds with their birth sex

<sup>5</sup> [If not now, when? - Social Renewal Advisory Board report: January 2021 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/if-not-now-when-2021/pages/1-1-introduction.aspx)

<sup>6</sup> [Social capital in Scotland: report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/social-capital-in-scotland-2020/pages/1-1-introduction.aspx)

<sup>7</sup> [Fourth National Planning Framework - position statement: consultation analysis - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-4-2021/pages/1-1-introduction.aspx)

<sup>8</sup> [Covid Recovery Strategy: for a fairer future - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/covid-recovery-strategy-2021/pages/1-1-introduction.aspx)

carers and lone parents, the majority of whom are women, have also experienced disproportionate impacts.

The accompanying assessments to the Covid Recovery Strategy<sup>9 10 11</sup> provide evidence of the impacts across the protected characteristics and on people impacted by socio-economic disadvantage.

In addition, in terms of this assessment, the Scottish Government<sup>12</sup> has identified the following socially vulnerable groups as being sensitive to climate impacts.

- Older people – tend to be more sensitive to the health effects from climate impacts.
- People in poor health or with poor mobility and access – people with existing physical or mental health problems may have a lower capacity to take action.
- Social isolation – people who are socially isolated may not receive the help they need during flooding or extreme weather events as they lack the necessary support networks.

There has been a steady increase in the proportion of adults viewing climate change as an immediate and urgent problem, from 46 percent in 2013 to 68 percent in 2019. The largest increase is amongst 16-24 year olds, increasing from 38 percent in 2013 to 69 percent in 2019<sup>13</sup>.

In 2019, for the first time, the majority of each age group viewed climate change as an immediate and urgent problem. The proportion for each of the four age groups from 16-59 was around seven in ten, similar to that for 2018. By contrast the proportions for those aged 60-74 increased from 58 percent to 68 percent and for those aged 75+ from 46 percent to 56 percent.

With regard to health and wellbeing, in 2018 the Scottish Government and COSLA jointly published Public Health Priorities in Scotland<sup>14</sup>. It sets out six priorities of a Scotland where we:

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<sup>9</sup> [Covid Recovery Strategy: For a fairer future - Equality Impact Assessment - Results \(www.gov.scot\)](https://www.gov.scot/publications/covid-recovery-strategy-equality-impact-assessment-results/pages/11.aspx)

<sup>10</sup> [Covid recovery strategy - for a fairer future: fairer Scotland duty assessment - summary - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/covid-recovery-strategy-fairer-scotland-duty-assessment-summary/pages/1.aspx)

<sup>11</sup> [Covid recovery strategy - for a fairer future: children's rights and wellbeing impact assessment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/covid-recovery-strategy-childrens-rights-and-wellbeing-impact-assessment/pages/1.aspx)

<sup>12</sup> [Climate Ready Scotland: climate change adaptation programme 2019-2024 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/climate-ready-scotland-climate-change-adaptation-programme-2019-2024/pages/1.aspx)

<sup>13</sup> [Scottish household survey 2019: annual report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-household-survey-2019-annual-report/pages/1.aspx)

<sup>14</sup> [Public Health Priorities for Scotland \(www.gov.scot\)](https://www.gov.scot/publications/public-health-priorities-for-scotland/pages/1.aspx)

- Live in vibrant, healthy and safe places and communities
- Flourish in our early years
- Have good mental wellbeing
- Reduce the use of and harm from alcohol, tobacco and other drugs
- A sustainable, inclusive economy with equality of outcomes for all
- Eat well, have a healthy weight and are physically active.

The National Performance Framework contains a specific outcome on Health<sup>15</sup>. A number of the accompanying indicators have direct relevance to developments in the built environment.

Public Health Scotland has published National Planning Framework 4: Briefing on health and proposed National Developments<sup>16</sup> (2021). This briefing has informed the Scottish Government's strategic assessment of projects proposed for 'National Development' status in the Draft NPF4. The generic development types considered in this report are:

- Transport, which includes active travel, public transport and air travel
- Green and blue infrastructure/spaces
- Housing
- Mixed Use and vacant and derelict land
- Other developments, which include tourism and recreation, industrial development, and digital infrastructure
- Energy and heat generation, which includes heat networks and renewable energy generation.

We have not sought to repeat the evidence set out above in this EQIA. Additional evidence gathered under each of the protected characteristics is contained below.

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<sup>15</sup> [Health | National Performance Framework](#)

<sup>16</sup> <https://www.publichealthscotland.scot/publications/national-planning-framework-4-briefing-on-health-and-proposed-national-developments/>



## Age

### Relationship between Planning and the Age characteristic

Planning is concerned with the creation of better places. This requires development that can accommodate future changes of use, taking into account how people use places differently, for example depending on age and degree of personal mobility. Previously advice on improving the design of places is contained in Planning Advice Note 78: Inclusive Design<sup>17</sup>.

Scottish Planning Policy (2014) recognises that as part of the Housing Needs and Demand Assessment, local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for older people. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites.

The importance of considering the age characteristic in the development of places is recognised in the questions which form the Place Standard tool<sup>18</sup>. It provides a simple framework for local people to assess the quality of a place and to help structure conversations about future improvement. It allows people to think about the physical elements of a place (for example its buildings, spaces, and transport links), as well as the social aspects (for example whether people feel they have a say in decision making).

Of the 14 questions in the Place Standard tool, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider age when making a response. In addition, a number of the other questions ask people to consider their responses with a perspective which has an equalities angle, for example by considering people's mobility.

With its Inclusion Standard, the National Standard for Community Engagement<sup>19</sup> encourages the identification and involvement of people and groups who are affected by the focus of the engagement, and are involved at the earliest opportunity. Measures should be taken to involve groups with protected characteristics and people who are excluded from participating due to disadvantage relating to social or economic factors.

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<sup>17</sup> [PAN 78: Planning and Building Standards Advice Note: Inclusive Design - gov.scot \(www.gov.scot\)](#)

<sup>18</sup> [place-standard.pdf \(placestandard.scot\)](#)

<sup>19</sup> [National Standards for Community Engagement | SCDC - We believe communities matter](#)

More recently, the Planning (Scotland) Act 2019<sup>20</sup> contains a number of provisions supporting older people. These include:

- NPF4 high level outcomes on: meeting the housing needs of people living in Scotland including, in particular, the housing needs of older people and disabled people'; improving the health and wellbeing of people living in Scotland; and improving equality and eliminating discrimination.
- The Local Development Plan should set out the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people, and the availability of land in the district for housing, including for older people and disabled people;
- The planning authority evidence report is to contain a summary of the action taken to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, including an analysis of the extent to which the action has helped to meet those needs.

## Evidence Base

### Age and demographics

The data set out below link the age characteristic with demographic data.

The Mid-2020 Population Estimates Scotland<sup>21</sup> (2020) estimated that on 25 June 2021, Scotland's population was 5,466,000. It also noted that Scotland's population is ageing. In mid-2020, 19% of the population were aged 65 and over, compared with 17% a decade earlier in mid-2010. Over the same period, the population aged 65 and over increased in all council areas.

In the 25 years from 2018 to mid-2043<sup>22</sup>, Scotland's population is projected to grow by 2.5% to 5.57 million. The population in Scotland is projected to rise to 5.54 million over the next 10 years (to mid-2028), an increase of 99,000 people (1.8%). However, population growth is projected to be slower than that seen in the last 10 years.

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<sup>20</sup> [Planning \(Scotland\) Act 2019 \(legislation.gov.uk\)](https://legislation.gov.uk)

<sup>21</sup> [Mid-2020 Population Estimates Scotland | National Records of Scotland \(nrscotland.gov.uk\)](https://nrscotland.gov.uk)

<sup>22</sup> [Projected Population of Scotland \(2018-based\) | National Records of Scotland \(nrscotland.gov.uk\)](https://nrscotland.gov.uk)

Scotland's population is projected to age<sup>23</sup>. Over the 10 years to mid-2028, there are projected to be 38,100 more people of pensionable age in Scotland, with the number projected to increase by 240,300 in the 25 years to mid-2043.

All 32 Scottish council areas have seen an increase in their population aged 65 and over in the last decade – including those areas where the total population fell. The greatest increases in the population aged 65 and over were in West Lothian (32%), Orkney Islands (31%) and Clackmannanshire (31%).

Figures published in 2020 noted that people who are of pensionable age are projected to have the largest increase in population between mid-2018 and mid-2028<sup>24</sup>. The largest increases are projected to be in the Lothians. Only 6 councils are projected to see a decrease in the number of people of pensionable age. The largest projected decreases are projected for: Dundee City (-3.8%) Argyll and Bute (-1.7%) Na h-Eileanan Siar (-1.2%). It was also projected that all councils will see an increase in people aged 75 and over. The scale of these increases is larger than any of the other age groups. The highest increase is projected to be in Clackmannanshire (+41.5%) and the lowest in Glasgow City (+4.3%).

The age structure of the population across Scotland continues to vary<sup>25</sup>. Overall the median age was 42 years, however this can vary widely. For example: the data zone with the:

- Lowest median age (20 years) was Ruchill – 04 in Glasgow City, which contains student accommodation for Glasgow University.
- Highest median age (72 years) was Falkirk – Town Centre and Callendar Park, which contains a number of developments aimed at older residents.

In 2018, the James Hutton Institute provided demographic projections<sup>26</sup> for the Scottish Sparsely Populated Area (SPA)<sup>27</sup>, it is projected to lose approximately 28% of its population by 2046. When the projected trend for the SPA is disaggregated by age group, it appears that the largest decline will be in the working age population. Across the SPA as a whole this economically active age group is predicted to decline by approximately one third by 2046, whilst the numbers of children and pensioners are projected to decline by 19% and 18% respectively.

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<sup>23</sup> [Mid-year Population Estimates, 2020: Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/publications/mid-year-population-estimates-2020-report)

<sup>24</sup> [Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/publications/mid-year-population-estimates-2020-report)

<sup>25</sup> [Report \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/publications/mid-year-population-estimates-2020-report)

<sup>26</sup> [https://www.hutton.ac.uk/sites/default/files/files/RD%203\\_4\\_1%20Working%20Paper%203%20O1\\_2ii%20260218%20-%20published.pdf](https://www.hutton.ac.uk/sites/default/files/files/RD%203_4_1%20Working%20Paper%203%20O1_2ii%20260218%20-%20published.pdf)

<sup>27</sup> The SPA contains six sub-regions: Northern Isles, Western Isles, North West Highlands, South East Highlands, Argyll and Bute, and Southern Uplands

The summary paper<sup>28</sup> provides analysis showing the possible effect on the future population size of Scotland of changes in levels of EU migration. It sets out the following points:

- The population of Scotland is projected to rise from 5.44 million in 2018 to 5.54 million in mid-2028. Overall, in the 25 year period from mid-2018 to mid-2043, it increases by 2.5% to 5.57 million.
- In a scenario of 50% less EU migration, the population of Scotland is projected to rise to 5.49 million in mid-2043 – an increase of 1.0% from mid-2018. The population is projected to peak in mid-2033, at 5.52 million.
- In a scenario of zero future EU migration, the population of Scotland is projected to fall to 5.41 million by mid-2043, resulting in an overall decrease of 0.5% over the 25 year projection period. The population is projected to peak in mid-2028 at 5.49 million, and decline thereafter.
- Varying the level of migration has the greatest effect on the number of children and people of working age, as migration is concentrated amongst young adults. The number of people of pension age is less affected.

Diana Findley, Chair of Scottish Older People’s Assembly, set out<sup>29</sup> her thoughts on Scotland2050 and specifically places for older people in a think piece. Key issues that relate to older people and planning include ensuring the Scotland has:

- housing that is warm, secure, accessible and adaptable to enable older people to live independently and well as they age; and
- spaces that support active, healthy ageing, where older people can access community activities and services they need, interact with people of all ages, get about easily and enjoy spending time.

## Participation

In 2019<sup>30</sup>, only one in five adults (18%) agreed that they can influence decisions affecting their local area, while 30% said that they would like to be more involved in the decisions their council makes, a decrease from 38% in 2007.

Generally, older adults were more likely than younger adults to say they are satisfied with local government performance and less likely to want to be more involved in

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<sup>28</sup> [Publication \(nrscotland.gov.uk\)](#)

<sup>29</sup> <https://www.transformingplanning.scot/media/1245/tp-places-for-older-people-v2.pdf>

<sup>30</sup> [Scottish household survey 2019: annual report - gov.scot \(www.gov.scot\)](#)

making decisions. The percentage of people who agree with the statement "I can influence decisions affecting my local area" is an indicator under the National Performance Framework's Human Rights Outcome<sup>31</sup>.

A Fairer Scotland for Older People: framework for action<sup>32</sup> (2019) noted that older people want action to ensure that they have access to opportunities to remain actively engaged with, and involved in, their communities.

The Analysis of Responses to the NPF4: Position Statement consultation<sup>33</sup> (2021) noted that when considering encouraging participation, that digital-only engagement can exclude many older people.

## Housing

As noted above, housing for older people is currently covered in the specialist housing section of Scottish Planning Policy (2014).

Household Projections for Scotland (2018-based)<sup>34</sup> (2020) noted that the number of households in Scotland is projected to increase by 120,000 (5%) over the next 10 years, from 2.48 million in 2018 to 2.60 million in 2028. Over the entire 25-year projection period, the number of households is projected to increase by 10% to 2.71 million by 2043. It also notes that Scotland's population is ageing. The number of people aged 65 and over is increasing much faster than the number of children and younger adults. This has an impact on household structure as children tend to live in larger households and older people in smaller ones.

A Fairer Scotland for Older People: framework for action<sup>32</sup> (2019) recognises that older people want action to ensure that they have access to adequate housing that continues to meet their needs as they age.

The Analysis of Responses to the NPF4: Position Statement consultation<sup>33</sup> (2021) noted the issue of accessible housing supply, including through calls for the needs of groups such as older people to be explicitly considered at every stage of the development of NPF4 and the other policies and strategies that will sit alongside it. Respondents also made a range of specific suggestions relating to the delivery of accessible housing provision and how NPF4 should enable and support that delivery.

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<sup>31</sup> [National Indicator Performance | National Performance Framework](#)

<sup>32</sup> [A Fairer Scotland for Older People: framework for action - gov.scot \(www.gov.scot\)](#)

<sup>33</sup> [Fourth National Planning Framework - position statement: consultation analysis - gov.scot \(www.gov.scot\)](#)

<sup>34</sup> [Report \(nrscotland.gov.uk\)](#)

A number of issues relating to older people and housing were highlighted in the Housing to 2040: equality position statement<sup>35</sup>. These included:

- Main feedback from stakeholders included concerns with regards to the rapidly increasing ageing population, the role of health and social care in the Scottish Government's approach to housing, and the importance of involvement of older people at the centre of decision-making.
- Stakeholders also called for further support for independent living and support for people wishing to downsize.
- The 2019 Scottish House Condition Survey<sup>36</sup> highlighted that older people are more likely to live in less energy efficient homes.

The linked Present Voices, Future Lives final report<sup>37</sup> (2021) recommended:

- New housing to be designed with more flexibility and adaptability to allow people to remain in their homes and communities as they age and encounter health and mobility issues. More adaptable housing will also remain 'fit for purpose' for a longer duration, preserving valuable physical resources.

### Spaces and places

The RTPI's Practice Advice Dementia and Town Planning<sup>38</sup> (2017) suggests that evidence has shown that good quality housing and well planned, enabling local environments can have a substantial impact on the quality of life of someone living with dementia, helping them to live well for longer. It goes on to say that, if you get an area right for people with dementia, you get it right for older people, for young disabled people, for families with small children, and ultimately for everyone.

The RTPI's Practice Advice Mental Health and Town Planning<sup>39</sup> (2020) highlights how consideration of environments designed for positive mental health can be achieved in a variety of ways. They include:

- Encouraging inclusive and connected communities
- Creating a pedestrian friendly place

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<sup>35</sup> [Housing to 2040: equalities position statement - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/housing-to-2040-equality-position-statement/pages/12.aspx)

<sup>36</sup> [Scottish house condition survey: 2019 key findings - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-house-condition-survey-2019-key-findings/pages/1.aspx)

<sup>37</sup> [Housing to 2040 - Present Voices, Future Lives: final report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/housing-to-2040-present-voices-future-lives-final-report/pages/1.aspx)

<sup>38</sup> [dementiatownplanning-practiceadvice2017.pdf \(rtpi.org.uk\)](https://www.rtpi.org.uk/wp-content/uploads/2017/06/dementiatownplanning-practiceadvice2017.pdf)

<sup>39</sup> <https://www.rtpi.org.uk/practice/2020/october/mental-health-and-town-planning/#health>

- Introducing new greenspace
- Protecting inner city access to greenspace
- Refusing permission for isolated retirement housing
- Restoring local pride
- Temporary solutions to vacant sites.

Over nine in ten adults view their neighbourhood as a very or fairly good place to live, with the majority of adults in Scotland (57.4%) rating their neighbourhood as a very good place to live in 2018<sup>40</sup>. Almost nine in ten adults (87%) aged 75 and above said they felt a very or fairly strong sense of belonging to their community, compared to just over seven in ten (73%) of those aged between 16 and 24.

Based on examples in three communities in each of Edinburgh, Glasgow and Manchester, the Place-Age Place-Making with Older Adults: Towards Age-Friendly Cities and Communities<sup>41</sup> ‘presents policy and practice guidelines, structured according to the key issues that have emerged across case studies’. In the research, older participants identified a number of key areas for the development of age-friendly communities:

- Navigating outdoor spaces
- Housing and home
- Negotiating social participation
- Building intergenerational communities
- Enabling age-friendly cultural supports
- Respect and feeling valued.

### Connectivity

Although older adults<sup>9</sup> were less likely to use the internet, the gap in internet use between adults aged 16-24 and adults aged 60 and above has fallen over time from 57 percentage points in 2007 to 35 percentage points in 2018. This result has mainly

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<sup>40</sup> [Scottish household survey 2018: annual report - gov.scot \(www.gov.scot\)](http://www.gov.scot)<sup>41</sup> [Place Age guidelines and recommendations from the UK research are available as a PDF \(ufpel.edu.br\)](http://ufpel.edu.br)

<sup>41</sup> [Place Age guidelines and recommendations from the UK research are available as a PDF \(ufpel.edu.br\)](http://ufpel.edu.br)



been driven by an increase in internet use amongst adults aged 60+ (from 29% to 65%).

In 2018, the Scottish Government published A Connected Scotland<sup>42</sup>, its strategy for tackling social isolation and loneliness and building stronger social connections. It recognises social isolation and loneliness as major public issues that can have significant impacts on the physical and wellbeing of older people. This is reiterated in A Fairer Scotland for Older People: framework for action<sup>13</sup> (2019) which sets out that people want actions that enable them to be and stay part of their communities, rather than having a sole focus on reacting to social isolation.

People also discussed the challenges of making new connections and friendships, and described the many ways in which they are gradually distanced from their local communities and other networks to which they belong – issues such as the impacts of changes to shopping patterns, fewer post offices, libraries and similar places, reduced public transport, unmaintained pavements and poor street lighting that pose risks to safety, and problems with availability of public toilets, for instance. They want to be part of finding new ways of doing things that build inclusive communities.

Coronavirus (COVID-19): health and social impact assessment<sup>43</sup> (2020) identified specific risks that may need consideration in ongoing or new action include social isolation amongst older people, who are less likely to use online communications and who make up a large percentage of those who live alone. However, survey data suggest that it may be younger adults who are at greatest risk of poor mental wellbeing during the pandemic.

In 2019<sup>44</sup>, around three quarters (74%) of adults travelled the previous day. This was little changed from 73% in 2018, but a slight decrease from 77% in 2009. As in previous years, older people were less likely to have travelled the previous day than younger age groups. People aged 16 to 19 were most likely to have used the bus in the last month (57%), while people aged 50 to 59 were least likely to have used the bus in the last month (29%).

## Health and Wellbeing

Public Health Scotland<sup>45</sup> notes that life expectancy and healthy life expectancy are increasing for both men and women. However, the length of time spent in ill health is also rising, as the incidence of health problems increases with age.

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<sup>42</sup> [A Connected Scotland: our strategy for tackling social isolation and loneliness and building stronger social connections - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/a-connected-scotland/summary/pages/10/index.aspx)

<sup>43</sup> [Coronavirus \(COVID-19\): health and social impact assessment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/coronavirus-health-and-social-impact-assessment/summary/pages/10/index.aspx)

<sup>44</sup> [transport-and-travel-in-scotland-2019-key-findings-report.pdf](https://www.gov.scot/publications/transport-and-travel-in-scotland-2019-key-findings-report/pages/10/index.aspx)

<sup>45</sup> [Older people - Population groups - Public Health Scotland](https://www.gov.scot/publications/older-people-population-groups/pages/10/index.aspx)



Being active improves psychological wellbeing, boosts self-esteem, plays an important role in maintaining a healthy weight and improves mood and sleep quality.

The link between green space and wellbeing is well established. Studies have shown that people experience less mental distress, less anxiety and depression, greater wellbeing and healthier cortisol levels (the hormone that controls mood) when living in urban areas with more green space compared with less.<sup>46</sup> The benefits of green and open space to people's mental health and wellbeing became very evident during the Covid-19 pandemic. Almost three-quarters (70%) of people surveyed felt spending time outdoors in nature in 2020 helped them to de-stress, relax and unwind and 56% agreed that it improved their physical health.<sup>47</sup>

A case–control study of the health and wellbeing benefits of allotment gardening<sup>48</sup> found that it can play a key role in promoting mental wellbeing and could be used as a preventive health measure.

The Active Scotland Delivery Plan<sup>49</sup> (2018) looks to ensure everyone has access to opportunities to be active, regardless of their race or ethnicity, their disability, their gender or sexual orientation, their age or religion and includes a number of age-related actions.

The Scottish Health Survey: main report 2018<sup>50</sup> (revised 2020) notes that physical activity levels varied significantly by age with younger age groups more likely to meet the Moderate to Vigorous Physical Activity (MVPA) guidelines than older age groups. A higher proportion of those aged 16-24 met the physical activity guidelines (77%), declining to 67% among those aged 45-54, and to 31% among those aged 75 and over.

The Cleaner Air for Scotland 2: equalities impact assessment<sup>51</sup> (2020) noted that there is consistent evidence that older people are particularly vulnerable to the adverse effects of air pollution.

Data<sup>15</sup> relating to indicators under the Health Outcome of the National Performance Framework indicate that:

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<sup>46</sup> Mental Health And Town Planning (RTPI) Practice Note, 2020 [mentalhealthtownplanning2020-final.pdf](https://www.rtpi.org.uk/mentalhealthtownplanning2020-final.pdf) ([rtpi.org.uk](https://www.rtpi.org.uk))

<sup>47</sup> [Covid drives huge increase in use of urban greenspace](https://www.natural.scot.gov.uk/news/covid-drives-huge-increase-in-use-of-urban-greenspace) | NatureScot

<sup>48</sup> <https://www.nsalg.org.uk/wp-content/uploads/2012/05/health-and-well-being-allotments.pdf>

<sup>49</sup> [Active Scotland Delivery Plan - gov.scot](https://www.gov.scot/Active-Scotland-Delivery-Plan) ([www.gov.scot](https://www.gov.scot))

<sup>50</sup> [Scottish Health Survey 2018: main report - revised 2020 - gov.scot](https://www.gov.scot/Scottish-Health-Survey-2018-main-report-revised-2020) ([www.gov.scot](https://www.gov.scot))

<sup>51</sup> [Cleaner Air for Scotland 2: equalities impact assessment - gov.scot](https://www.gov.scot/Cleaner-Air-for-Scotland-2-equalities-impact-assessment) ([www.gov.scot](https://www.gov.scot))

- Adults in the 65-74 age group had the highest average wellbeing (52.0) compared to adults aged 25-34 who had the lowest average wellbeing (49.1)
- Overall, more young adults were at a normal weight compared to older adults. The age group with the greatest percentage at a normal weight was the 16-24 group at 54%, while the age group with the smallest percentage at a normal weight was the 65-74 age group (21%).
- Adults in younger age groups were more likely to be meeting physical activity recommendations compared to older adults. The most active age group was the 25-34 age group, with 77% meeting recommended levels of physical activity. The least active group was the 75+ age group, with 35% meeting the recommended activity levels.
- Results show that as adults get older they tend to make a smaller proportion of journeys under two miles by walking.

In terms of delivering improved health and wellbeing, respondents to the NPF4 Position Statement consultation<sup>12</sup> made reference to thinking carefully about the ageing population, and how we plan for the needs of older people in a way that is inclusive and sustainable, including maximising opportunities for independent living.

#### [Opportunities to improve equality and eliminate discrimination on the Age characteristic](#)

Remaining active and engaged in communities is a clear priority for older people. Issues such as feeling their voice is respected, making public spaces safe and welcoming, ensuring availability of transport at affordable prices, delivering adequate and appropriate housing, fostering communities, encouraging intergenerational activity and ensuring people feel safe in their communities are key to delivering this.

In taking steps to meet the needs of older people where these are different from the needs of other people, the Scottish Government recognises that not only is Scotland's population growing, but it is also ageing. There is a spatial dimension with the population ageing at differing rates across the country and so there is a need for some discretion for planning authorities to plan for future housing in their areas, based on a robust evidence base.

Older people want action to ensure they have access to adequate housing that continues to meet their needs as they age. And in terms of removing or minimising disadvantages suffered by people due to the age protected characteristic, older people want action to ensure they have access to opportunities to remain actively engaged with, and involved in, their communities.

## Disability

### Relationship between Planning and the Disability characteristic

As with the age characteristic, planning is concerned with the creation of better places. This requires development that can accommodate future changes of use, taking into account how people use places differently, for example depending on the degree of personal mobility and how places can affect people's health and wellbeing. Though planning may have focussed on issues around barriers to mobility, it should also include consideration of people with mental health needs and those living with dementia.

Of the 14 questions in the Place Standard tool<sup>18</sup>, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider mobility and disability when coming to a response. In addition, a number of the other questions ask people to consider their responses with a perspective which has an equalities angle.

Advice on improving the design of places so that they can be used by everyone, regardless of age, gender or disability is contained in Planning Advice Note 78: Inclusive Design. In 2009, the Government also introduced requirements for certain planning applications to be accompanied by design and access statements at the development management stage.

More recently, the Planning (Scotland) Act 2019<sup>20</sup> contains a number of provisions supporting disabled people. These include:

- NPF4 high level outcomes on: meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people'; improving the health and wellbeing of people living in Scotland; and improving equality and eliminating discrimination;
- The Local Development Plan should set out the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people, and the availability of land in the district for housing, including for older people and disabled people;
- The planning authority evidence report is to contain:
  - A summary of the action taken to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area including an analysis of the extent to which the action has helped to meet those needs; and
  - A statement on how the planning authority has sought the views of disabled people, including the extent to which the views expressed have been taken into account.

Scottish Planning Policy (2014) recognises that as part of the Housing Need and Demand Assessment, local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for those with a disability. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites.

In addition, current planning policy provides for specific provision for parking for disabled people in addition to general provision in retail, recreation and leisure developments. The minimum number of car parking spaces for disabled people at places of employment are also provided for.

Planning Advice Note 3/2010: Community Engagement<sup>52</sup> recognises that an understanding is needed about the support particular individuals or groups require to help them engage. It notes that the needs of minority groups and people with disabilities should be accommodated where possible, including the opportunity to access information in alternative formats such as Braille, large text and audio, and the provision of information in alternative languages. Some people may need practical support with, for example, transport or child care, and whilst this is sometimes impractical, the benefits of providing some assistance can be considerable.

### Evidence base

Census<sup>53</sup> data from 2011 reports that the proportion of people in Scotland with a long-term activity-limiting health problem or disability was 20%. A higher proportion of women than men were limited in their day-to-day activities by a long-term health problem or disability. Just under a quarter (24%) of adults in Scotland reported having a limiting long-term health condition in 2019<sup>54</sup>, one percentage point more than the year before.

### Participation

The NPF4: Position Statement analysis, when referring to the 20 minute neighbourhood policy, noted that diverse needs should be taken into account. It was suggested that it will be important not just to focus on people living and working in a particular place, but to connect to wider organisations – for instance those representing disabled people. A connected point was that plans around reducing the

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<sup>52</sup> [Planning Advice Note 3/2010: community engagement - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/planning-advice-note-3-2010/pages/1-10.aspx)

<sup>53</sup> <http://www.scotlandscensus.gov.uk/census-results>

<sup>54</sup> [Scottish household survey 2019: annual report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-household-survey-2019/pages/1-10.aspx)

need to travel will need to take into account that some equalities groups will need to travel to access suitable support and social activities.

A Fairer Scotland for Disabled People (2016) is the Government's delivery plan to 2021 for the United Nations Convention on the Rights of Persons with Disabilities<sup>55</sup>. It sets out active participation as one of its five ambitions - disabled people can participate as active citizens in all aspects of daily and public life in Scotland.

Disabled people are keen to be involved in shaping the places that they stay, but that there can be barriers to that engagement. Supercharged: A human catastrophe<sup>56</sup> (2020) prepared by the Glasgow Disability Alliance calls for the lived experience of disabled people to be embedded in the redesign of public spaces and town planning. It goes on to state that through inclusive digital and offline engagement and capacity building, disabled people's aspirations should be raised, providing opportunities to fulfil their potential, and strengthen participation and democracy.

As reported in the National Performance Framework - disability perspective: analysis<sup>57</sup> (2021) disabled people were slightly less likely than non-disabled people to agree with the statement 'I can influence decisions affecting my local area'. The percentage of people who agree with the statement 'I can influence decisions affecting my local area' is an indicator under the National Performance Framework's Human Rights Outcome. Significantly fewer disabled people viewed their neighbourhood as a very good place to live compared to non-disabled people (51% vs 59%).

### Accessing Housing and Spaces/Places

According to the Equality and Human Rights Commission (EHRC) report Housing and disabled people (2018)<sup>58</sup>, Scotland's disabled population faces considerable housing challenges. Appropriate and accessible housing is the cornerstone of independent living and can transform people's lives for better, yet many disabled people across Scotland live in homes that do not meet their needs. The report highlights the scale of the issue and states that only approximately 1% of housing is fully accessible for wheelchair users; 61,000 people need adaptations to their home; and almost 10,000 disabled Scots are on housing waiting lists.

With regard to the priorities for disabled people, the particular issue of accessible housing supply have been raised, including through calls for the needs of groups such as older and disabled people to be explicitly considered at every stage of the

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<sup>55</sup> [A Fairer Scotland for Disabled People: delivery plan - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-for-disabled-people-delivery-plan-2016-2021/pages/26.aspx)

<sup>56</sup> [Supercharged: A Human Catastrophe • Glasgow Disability Alliance \(gda.scot\)](https://www.gda.scot.nhs.uk/publications/supercharged-a-human-catastrophe/)

<sup>57</sup> [National Performance Framework - disability perspective: analysis - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-performance-framework-disability-perspective-analysis-2021/pages/1.aspx)

<sup>58</sup> [housing-and-disabled-people-scotland-hidden-crisis-executive-summary.pdf \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/housing-and-disabled-people-scotland-hidden-crisis-executive-summary.pdf)

development of NPF4 and the other policies and strategies that will sit alongside it. It was a clear message from the Scotland2050 Think Pieces prepared by Grant Carson<sup>59</sup> of the Glasgow Disability Alliance and Susan Fitton<sup>60</sup> from Inclusion Scotland. A Fairer Scotland for Disabled People (2016)<sup>55</sup> sets out places that are accessible to everyone as one of its five ambitions - disabled people can live life to the full in homes and communities across Scotland, with housing and transport and the wider physical and cultural environment designed and adapted to enable disabled people to participate as full and equal citizens.

Housing and other issues were raised in Inclusion Scotland's Disabled People's Views of the Fairer Scotland For Disabled People Delivery Plan<sup>61</sup> (2020). It set out that almost half (43%) of people said the accessibility of places had stayed the same, around a third (31%) said they had got worse, 16% said they had got better and 10% said they were not sure. The issues for disabled people were:

- There is not enough accessible housing and disabled people are still living in unsuitable accommodation which does not meet their needs.
- The built environment is often inaccessible and initiatives like 'shared spaces' and others which promote active travel have had particular detrimental impacts on disabled people.

A number of issues and evidence relating to older people and housing were highlighted in the Housing to 2040: equality position statement<sup>62</sup>. These include:

- According to the 2018 Equality and Human Rights Commission<sup>63</sup> report on housing issues affecting disabled people, Scotland's disabled population faces considerable housing challenges.
- The travelling exhibition Final Report 'Present Voice, Future Lives'<sup>64</sup> (2021), also highlighted the need for houses which can adapt and change with their occupants over the course of a lifetime, particularly as they grow older and potentially encounter mobility issues.

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<sup>59</sup> <https://www.transformingplanning.scot/media/1268/tp-building-a-more-accessible-world-for-us-allpdf-v2.pdf>

<sup>60</sup> <https://www.transformingplanning.scot/media/1261/tp-places-for-disabled-people.pdf>

<sup>61</sup> Not currently available online, available from Inclusion Scotland

<sup>62</sup> [Housing to 2040: equalities position statement - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/housing-to-2040-equalities-position-statement/pages/2.aspx)

<sup>63</sup> [housing-and-disabled-people-scotland-hidden-crisis-executive-summary.pdf \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/housing-and-disabled-people-scotland-hidden-crisis-executive-summary.pdf)

<sup>64</sup> [Housing to 2040 - Present Voices, Future Lives: final report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/housing-to-2040-present-voices-future-lives-final-report/pages/2.aspx)



The Royal Town Planning Institute's practice advice: Mental Health and Planning<sup>65</sup> (2020) notes four key themes for places: Green, Active, Pro-social and Safe.

The National Performance Framework - disability perspective<sup>57</sup>: analysis (2021) found that significantly fewer disabled people lived within 5 minutes' walk of their nearest green or blue space - three fifths (61%) of disabled adults had this access, compared to just over two thirds (67%) of non-disabled adults. And that two fifths (40%) of disabled people made one or more visits to the outdoors per week, compared to just under two thirds of non-disabled people (61%).

Figures from the 2017/18 Scottish Crime and Justice Survey show that 65% of those with a disability felt very/fairly safe, compared to 80% without a disability. It noted that there may be complex factors in addition to protected characteristics which make people feel safe/unsafe, for example whether they live in deprived areas.

### Connectivity

The analysis of responses to the NPF4 Position Statement noted that investment in public transport was argued to be key for people with a disability, to ensure an integrated public transport system that is affordable, available and accessible for everyone.

There was no significant difference<sup>57</sup> between the percentage of disabled and non-disabled people who usually travelled to work by public or active transport across 2018-19.

Prepared by Inclusion Scotland, Disabled People's Views of the Fairer Scotland For Disabled People Delivery Plan<sup>61</sup> (2020) identified that disabled people are still unable to use public transport in a consistent way.

Transport Scotland recently published data on Disability and Transport: Findings from the Scottish Household Survey<sup>66</sup> (2021). It noted that:

- Disabled people tend to make fewer journeys than those non-disabled people and, on average, their journeys are shorter in distance.
- In broad terms, the modes of travel used by both disabled and non-disabled people are similar. For example, car driving journeys account for by far the largest proportion of journeys for both groups.

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<sup>65</sup> [RTPI | Mental health and town planning](#)

<sup>66</sup> <https://www.transport.gov.scot/media/50208/sct07219924801.pdf>

- A lower percentage of disabled people possess a driving licence (51% vs 75%) and a lower percentage have access to a car (52% vs 77%).

The Scottish Household Survey: Annual Report 2019 (2020) noted that 71% of adults who have some form of limiting long-term physical or mental health condition or illness reported using the internet, lower than for those who have some form of non-limiting condition or illness (90%) and those who have none (94%).

The Coronavirus (COVID-19): health and social impact assessment<sup>67</sup> (2020) noted that digital exclusion is also an issue for people with learning disabilities as they may not have access to or be able to effectively access online support and services and connect with friends and family.

Supercharged: A human catastrophe (2020) through inclusive digital and offline engagement and capacity building, raise disabled people's aspirations and opportunities to fulfil their potential, and strengthen participation and democracy.

### Health and Wellbeing

Data<sup>15</sup> relating to indicators under the Health Outcome of the National Performance Framework indicate that:

- People with a limiting long-term health condition had lower mean average mental wellbeing (45.4) compared to those who were not disabled (51.9).
- 28% of adults with a limiting long-term health condition were at a normal weight in 2019, compared to 35% of those who did not have a limiting long-term condition.
- 55% of adults with a limiting long-term health condition met physical activity recommendations, compared with 73% of those without.
- People with a permanent sickness or disability take a greater proportion of their short journeys on foot than the general population.

The Cleaner Air for Scotland 2: equalities impact assessment<sup>51</sup> (2020) noted that achieving compliance with air quality objectives and reducing preventable air pollution will improve air quality for Scotland's population, protecting those more vulnerable to its health impacts, including disabled people.

A range of evidence shows that disabled people have poorer mental health than non-disabled people. Recent data from the Scottish Health Survey shows that, in

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<sup>67</sup> [Coronavirus \(COVID-19\): health and social impact assessment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/coronavirus-impact-assessment/pages/10.aspx)



2018, disabled people had lower mental wellbeing than non-disabled people (45 compared to 52 on a scale of 14 to 72)<sup>68</sup>.

The Women's Health Plan<sup>69</sup> (2021) underpins actions to improve women's health inequalities by raising awareness around women's health, improving access to health care and reducing inequalities in health outcomes for girls and women, both for sex-specific conditions and in women's general health. One of its guiding principles is that the right to health is a fundamental human right, everyone has the right to the highest attainable standard of physical and mental health. It notes that a 2018 report from Engender describes how disabled women in Scotland report experiencing specific barriers when accessing a range of services, including a lack of accessible facilities.

The National Performance Framework - disability perspective: analysis<sup>57</sup> (2021) noted that significantly fewer disabled people lived within 5 minutes' walk of their nearest green or blue space - three fifths (61%) of disabled adults had this access, compared to just over two thirds (67%) of non-disabled adults. It also noted that just over half (55%) of adults with a limiting long-term condition met physical activity recommendations, compared to almost three quarters (73%) of non-disabled people. However, between 2017 and 2019 the percentage of adults with a limiting long-term condition meeting physical activity guidelines rose from 49% to 55% - a statistically significant change.

In 2018-19 disabled people were significantly less likely than non-disabled people to agree or strongly agree that there were places in which people can meet up and socialise.

Opportunities to improve equality and eliminate discrimination on the Disability characteristic

Draft NPF4 has the opportunity to contribute to the following areas and support the needs and aspirations of disabled people. Key elements include:

- Disabled people can participate as active citizens in all aspects of daily and public life.
- Disabled people to benefit from increased availability of affordable and accessible housing to support people to continue to life independent lives.
- Increased availability of accessible and inclusive transport and services.

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<sup>68</sup> <https://www.gov.scot/publications/scottish-health-survey-2018-supplementary-tables/>

<sup>69</sup> [Women's health plan - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/womens-health-plan-2021/)

Evidence would suggest that Draft NPF4 should include measures which enable disabled people's equal participation in the planning system and for the decisions taken to reflect a diversity of perspectives. There is an opportunity to build on tools such as the Place Standard.

In taking steps to meet the needs of disabled people where these are different from the needs of other people, the Scottish Government has noted that disabled people want action to ensure they have access to adequate housing to meet their needs.

The Scottish Government recognises that disabled people wish to play an active role in the development of the places they live, work and stay. In terms of removing or minimising disadvantages suffered by people due to the disability protected characteristic, the Draft NPF4 policies on local living can provide an opportunity to shape places which act as complete, connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle of their home.

## Sex

The Scottish Government's Equality Evidence Finder<sup>70</sup> notes that Scotland had a relatively even split between sexes, with 51% females and 49% males, although this varied amongst age groups.

### Relationship between Planning and the Sex characteristic

Planning is concerned with creation of better places. This requires development that can accommodate future changes of use, taking into account how people use places differently, for example depending on their sex. Organisations such as The World Bank have noted in general, 'cities work better for heterosexual, able-bodied, cisgender men than they do for women, girls, sexual and gender minorities, and people with disabilities'.

Of the 14 questions in the Place Standard tool<sup>18</sup>, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider the sex characteristic when coming to a response. In addition, a number of the other questions ask people to consider their responses with a perspective which has an equalities angle, for example, ease of access to childcare.

Scottish Planning Policy (SPP) (2014) currently notes that planning should support development that is designed to a high-quality, which demonstrates the six qualities of successful places. The adaptable quality takes into account how people use

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<sup>70</sup> [www.equalityevidence.scot](http://www.equalityevidence.scot)

places differently, for example depending on age, gender and degree of personal mobility.

Scotland's Gender Equality Index 2020<sup>71</sup> sets a baseline against which Scotland will be able to measure its future progress towards gender equality. It comprises six domains: work, money, time, knowledge, power and health, which are identified as key areas of life for women and men in Scotland. It highlights key areas where policy makers could target and develop programmes to make the largest impact on improving gender equality. Scotland's progress towards gender equality under these measures will be revealed in the next update of this index, which is scheduled for 2023. Potential key areas for planning and NPF4 are issues around access to employment, health and wellbeing and safety.

With reference to community participation in the planning system, Planning Advice Note 3/2010<sup>52</sup> recognises that community can be based on a common interest, value or background – for example societal groups (based on race, faith, ethnicity, disability, age, gender or sexual orientation). It goes on to recognise that certain techniques can be used in a practical sense to support the engagement of women, such as the provision of child-care or engagement with mother-toddler groups.

## Evidence Base

### Participation

Research from 2004<sup>72</sup> would suggest that women were slightly more likely than men to become involved in the planning process. This study was focussed on development management.

Of the 14 questions in the Place Standard tool<sup>18</sup>, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider the sex protected characteristic when coming to a response. In addition, a number of the other questions ask people to consider their responses with a perspective which has an equalities angle.

A 2018 article in The Planner<sup>73</sup> noted that planning frameworks and policy should embed gender equality as a design standard. At all levels, planning initiatives should include measures to enable women's equal participation and to include a diversity of perspectives.

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<sup>71</sup> [Scotland's Gender Equality Index 2020 \(data.gov.scot\)](https://data.gov.scot)

<sup>72</sup> [Planning and Community Involvement in Scotland - Research Findings \(webarchive.org.uk\)](https://web.archive.org)

<sup>73</sup> [It's time for gender-inclusive planning | The Planner](#)

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

The Scottish household survey: Key Findings report<sup>74</sup> from 2020 outlined that over three-quarters (78%) of adults felt a very or fairly strong sense of belonging to their neighbourhood. It also noted that older people and women were more likely to report a strong sense of belonging to their neighbourhood.

The First Minister's National Advisory Council on Women and Girls 2019 Report and Recommendations<sup>75</sup> (2020) noted that:

- Women have better cultural participation and sense of community belonging. Women are somewhat more likely than men to say that they have a very strong feeling of belonging to their community (38% vs 34%).
- More women (28%) than men (25%) volunteer for groups or organisations.

### Spaces, places and connectivity

Whilst evidence<sup>76</sup> would suggest that there was no significant difference between men and women who were victims of SCJS crime in 2019/20, it also notes that fewer women than men (69% compared to 76%) thought that the local crime rate had stayed the same or reduced in the past two years.

The First Minister's National Advisory Council on Women and Girls 2019 Report and Recommendations<sup>75</sup> (2020) noted that women are much less likely to feel safe walking alone in their neighbourhood after dark (66% vs 89% of men).

This is reinforced by the Scotland2050<sup>77</sup> Think Piece by the late Emma Ritch of Engender. She writes that: in the medium term, evidence, including from engagement with women, will be applied to planning processes in a gendered way, ensuring more gender-sensitive planning. In the long term, our public spaces will meet the distinct needs of women and men, and advance equality between women and men.

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<sup>74</sup> [Scottish household survey 2019: key findings - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-household-survey-2019-key-findings/pages/100-to-109.aspx)

<sup>75</sup> [National Advisory Council on Women and Girls \(NACWG\) 2019 - report and recommendations: SG response - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/nacwg-2019-report-and-recommendations/pages/100-to-109.aspx)

<sup>76</sup> [National Indicator Performance | National Performance Framework](https://www.gov.scot/publications/national-indicator-performance-2020/pages/100-to-109.aspx)

<sup>77</sup> [tp-gender-inclusive-places-v2.pdf \(transformingplanning.scot\)](https://www.gov.scot/publications/tp-gender-inclusive-places-v2/pages/100-to-109.aspx)

Intensive family support should be community based<sup>78</sup>: support must be explicitly connected to, or even housed in, locations that work for local families and the community, such as schools, health centres, village halls and sports centres. Communities must have a say in where support is located.

The Royal Town Planning Institute's Women in Planning (Part II)<sup>79</sup> (2021) provides a narrative around the impact of the planning profession on the day-to-day lives of women. Many of the study respondents appeared to agree that inequalities associated with women's movement through, and enjoyment of, the built environment stem from society's car dependency. With the design of cities principally focused around creating and improving road infrastructure for the private motor vehicle, this not only presents problems for the walkability and safety of neighbourhoods, but also for women's access to employment and educational opportunities with implications on career advancement. Study respondents also reported safety concerns with respect to public transport, lack of public surveillance in town centres, and inadequate street lighting that make the built environment awkward for women. In addition to safety concerns, lack of locally accessible employment opportunities, childcare facilities, public transport services, public toilet facilities, as well as inadequate pedestrian infrastructure were frequently cited by study respondents as significant barriers to women's access to equal opportunities in the built environment. This was particularly the case for those with caring responsibilities.

Women tend to use buses<sup>80</sup> more frequently than men (26% of women used the bus at least once a week compared to 23% of men). More recently, The Young Women's Movement report<sup>81</sup> (2021) looked at elements of Glasgow's transport and open space infrastructure through what it described as a 'feminist town planning' lens.

The need for a strategic spatial planning approach to public toilets in Britain<sup>82</sup> (2015) provides a spatial dimension to the provision of public toilets, arguing for a toilet distribution hierarchy. The impact particularly on women and older people who 'have to plan their journeys carefully, or give up going out altogether, as a result of toilet closure' is cited.

## Health and Wellbeing

The Women's Health Plan<sup>69</sup> (2021) notes that promoting health and disease prevention can include ensuring women have information about the benefits of

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<sup>78</sup> [Challenges from the frontline - revisited \(nspcc.org.uk\)](https://www.nspcc.org.uk)

<sup>79</sup> [RTPI | Women and Planning \(Part II\)](#)

<sup>80</sup> [Transport and Travel in Scotland 2019: Results from the Scottish Household Survey](#)

<sup>81</sup> [YOUNG WOMEN LEAD 2021 REPORT – OUT NOW! - YWCA Scotland | The Young Women's Movement](#)

<sup>82</sup> [https://www.researchgate.net/publication/281031483\\_strategic\\_issues\\_in\\_toilet\\_provision](https://www.researchgate.net/publication/281031483_strategic_issues_in_toilet_provision)

building and maintaining a healthy lifestyle including being physically active and maintaining a healthy weight.

The Active Scotland Delivery Plan<sup>83</sup> (2018) looks to ensure that everyone has access to opportunities to be active, regardless of their race or ethnicity, their disability, their gender or sexual orientation, their age or religion.

As reported in 2020<sup>84</sup>, a slightly higher proportion of men walk almost every day. 24% of men walked as a means of transport on 6-7 days in the last week in 2019, compared to 20% of women. A higher proportion of men cycle. 7% of men had cycled at least once as a means of transport in the last week, compared to 3% of women.

Data<sup>15</sup> relating to indicators under the Health Outcome of the National Performance Framework indicate that:

- With regard to mental health wellbeing, there was little difference between the scores for men (49.9) and women (49.7)
- 29% of men were at a healthy weight in 2019, compared to 36% of women.
- Men were more likely to meet the physical activity recommendations than women (71% compared to 61%).
- Men take a larger proportion of short journeys by bike than women.

The Scottish Health Survey: main report 2018<sup>50</sup> (revised 2020) notes that men were significantly more likely than women to meet the guidelines on physical activity across all age groups, with the greatest differences in the oldest and youngest age groups. Among men in the youngest age group (16-24), 83% met the guidelines, compared with 70% of women in the same age group and among men aged 75 and over, 39% met the guidelines compared with 26% of women in the same age group.

In 2019<sup>85</sup>, men were more likely than women to visit the outdoors weekly (58% compared to 54%). This was also found in 2017, when the figures were 54% and 51% respectively. No such difference between men and women was observed in 2018.

The Cleaner Air for Scotland 2: equalities impact assessment<sup>51</sup> (2020) noted that the issue of sex differences in vulnerability to air pollution is complex. The evidence is

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<sup>83</sup> [Active Scotland Delivery Plan - gov.scot \(www.gov.scot\)](http://www.gov.scot)

<sup>84</sup> <https://www.transport.gov.scot/media/48317/sct09201490081.pdf>

<sup>85</sup> [National Indicator Performance | National Performance Framework](#)

inconsistent in studies of adults, although research in older adults and studies that have used estimates of exposure based on place of residence suggest that the effects of air pollution are more pronounced in women.

### Opportunities to improve equality and eliminate discrimination on the Sex characteristic

Evidence would suggest that Draft NPF4 should include measures which enable women and men's participation in the planning system and for the decisions taken to reflect a diversity of perspectives. There is an opportunity to build on tools such as the Place Standard and link with the forthcoming guidance on effective community engagement in Local Development Plans.

In taking steps to meet the needs of women and men where these are different, the Scottish Government has noted particular issues around the way that women and men use public places. Key to this will be issues reflecting access to local employment and community facilities and the safety of users of public spaces. There is an opportunity to reflect this in policies within Draft NPF4.

In terms of removing or minimising disadvantages suffered by people due to this protected characteristic, the Draft NPF4 policy on local living provides an opportunity to shape places which act as complete, connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle of their home.

## **Sexual Orientation**

### Relationship between Planning and the Sexual Orientation characteristic

Data in Sexual Orientation in Scotland 2017: summary of evidence base<sup>86</sup> would suggest that there is in the region of 2% of people in Scotland who identify as LGBO (Lesbian, Gay, Bisexual, Other). Spatially, the above summary of evidence considered that access to the community may be one reason why a higher proportion of LGBO people live in urban areas.

It has been suggested that there is a spatial dimension to where the LGBT community lives in Scotland, with a focus of the community in large urban areas. This has, for example, potential implications for effective engagement with the community.

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<sup>86</sup> [Sexual orientation in Scotland 2017: summary of evidence base - gov.scot \(www.gov.scot\)](http://www.gov.scot)



## Evidence Base

### Participation

Hard to Reach, Easy to Ignore<sup>87</sup> (2017) noted that communities are now recognised to exist beyond geographical areas, therefore more needs to be done to tackle the inequalities faced by communities of identity (such as LGBT+ group).

Of the 14 questions in the Place Standard tool, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider sexuality when coming to a response.

As a whole, Consultation on the Modernisation of the Planning System with 'seldom heard' Groups<sup>88</sup> (2009) suggested that this group had no special needs or requirements when it came to planning, with their views representative of the general population. However, more recent research and guidance including in the World Bank's Handbook for Gender-Inclusive Urban Planning and Design (2020) suggests that our understanding of the needs of marginalised groups is developing.

### Housing

A number of issues relating to the sexual orientation characteristic and housing were highlighted in the Housing to 2040: equality position statement<sup>14</sup>. These include:

- Stonewall Scotland's report<sup>89</sup> highlighted that LGBT people are vulnerable to and at increased risk of homelessness, highlighting that almost one in five LGBT people (18%) have experienced homelessness at some point in their lives. LGBT young people in particular are disproportionately represented in the young homeless population; and
- For some LGBT people, the risks of homelessness, insecure employment, restricted access to healthcare and other inequalities will deepen as a result of the COVID-19 crisis.

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<sup>87</sup> ['Hard to reach' or 'easy to ignore'? Promoting equality in community engagement – Evidence review | What Works Scotland](#)

<sup>88</sup> [Consultation on the Modernisation of the Planning System with 'Seldom Heard' Groups \(webarchive.org.uk\)](#)

<sup>89</sup> [https://www.stonewall.org.uk/sites/default/files/lgbt\\_in\\_britain\\_home\\_and\\_communities.pdf](https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_home_and_communities.pdf)



## Spaces and Places

Queering Public Space<sup>90</sup> (2021) noted that planners should think beyond the gayborhood and move inclusive practice towards LGBTQ+ people beyond preserving queer places. They need to incorporate LGBTQ+ inclusion and safety in public space into their use of devices such as equality impact assessments and into the practical application of Statements of Community Involvement (participation statements) by consulting with LGBTQ+ groups.

In a survey of 684 LGBT children and young people (aged 13-25), less than half said there were enough places where they could safely socialise and be open about their sexual orientation and gender identity. This was a particular issue for transgender and non-binary people, of whom less than one third said there were enough places where they could socialise safely.<sup>91</sup>

A Report by Scottish Alliance for Children's Rights<sup>92</sup> notes LGBT children and young people may be significantly disadvantaged in accessing adequate play, leisure and culture opportunities.

Information contained in Hate Crime in Scotland 2018-19<sup>93</sup> is obtained from the Crown Office and Procurator Fiscal Service (COPFS) operational database. It notes that 1,176 charges were reported with an aggravation of prejudice relating to sexual orientation, 5% more than in 2017-18.

### [Opportunities to improve equality and eliminate discrimination on the Sexual Orientation characteristic](#)

Whilst we don't have specific evidence that participation in planning is disproportionately low for people with this protected characteristic, evidence would suggest that there may be value in ensuring that participation forms part of a collaborative approach to community engagement. There is an opportunity to build on tools such as the Place Standard.

Tackling issues around access and safety in public spaces may be of particular concern to this group of people. There is an opportunity to reflect this in policies within Draft NPF4.

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<sup>90</sup> [Queering Public Space - Arup](#)

<sup>91</sup> LGBT Youth (2018). Life in Scotland for LGBT Young People <https://www.lgbtyouth.org.uk/media/1354/life-in-scotland-for-lgbt-young-people.pdf>

<sup>92</sup> [State of Children's Rights in Scotland](#)

<sup>93</sup> [Hate Crime \(copfs.gov.uk\)](#)

## Pregnancy and Maternity

There is considerable evidence of beneficial effects of access to green space for the health of pregnant women. Specifically, studies in Europe showed positive associations between access to nearby green space and both reduced blood pressure and reduced depression in pregnant women, with a stronger effect for reduced depression in disadvantaged groups.<sup>94</sup>

Research also shows that access to green space in close proximity to the homes of pregnant women was positively associated with birth weight. Birth weight is a useful indicator of health in early life: low birth weight is one of the major predictors of neonatal and infant mortality, as well as long-term adverse effects in childhood and beyond. Recent studies also found a positive association between residential greenness measured and birth weight.

Responses to the NPF4: Call for Ideas noted that places that have not been designed to enable access by those with a variety of access needs become inaccessible, including for disabled women, carers, older women, pregnant women, and mothers of young children. In addition, a report<sup>95</sup> of the Scoping Exercise held in June 2020 to review English Guidance on Safer Public Places noted that pregnant women may also find standing difficult and need facilities to sit down.

The Cleaner Air for Scotland 2: equalities impact assessment<sup>51</sup> (2020) noted that epidemiological studies suggest a link between air pollution exposure and premature birth, with the strongest evidence for gaseous pollutants (O3 and SO2) and weaker evidence for particulates (PM2.5 and PM10). The strongest evidence from epidemiological studies of pregnancy outcomes is that air pollution affects foetal growth and birth weight. There is some suggestion that socio-economic deprivation increases the adverse effects of air pollution on low birth weight.

### Opportunities to improve equality and eliminate discrimination on the Pregnancy and Maternity characteristic

Tackling issues around access to facilities and public spaces may be of particular concern to people with this protected characteristic. There is an opportunity to reflect this in policies within Draft NPF4.

Noting the connection between premature birth and air pollution exposure, there is scope to promote air quality through policies in Draft NPF4.

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<sup>94</sup> [https://www.euro.who.int/\\_data/assets/pdf\\_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf](https://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf)

<sup>95</sup> [2020\\_06\\_09 Health Impact Scoping of Public Places Guidance \(scotphn.net\)](#)

## Race

### Relationship between Planning and the Race characteristic

Data from the 2011 Census<sup>96</sup> would suggest that around 4% of people in Scotland were from minority ethnic groups - an increase of two percentage points since 2001. There is also a spatial diversity across Scotland. Council areas with large cities had the highest proportion of their population from a minority ethnic group: 12% in Glasgow City, 8% in City of Edinburgh and Aberdeen City and 6% in Dundee City. In addition, 0.8% of the population in rural areas were from an ethnic minority background.

Census data also shows that, with regard to the Gypsy/Traveller community<sup>96</sup> there are spatial variations across Scotland. Just over 4,000 people in Scotland identified in the 2011 census that their ethnic group was 'White: Gypsy/Traveller' and this represented 0.1% of the population. However, it has been suggested that this is likely to underestimate the Gypsy/Traveller population due to a range of issues such as reluctance of individuals to identify as Gypsy/Travellers and challenges accessing the population living on sites and by the roadside. Organisations that work with Gypsy/Travellers believe Scotland's community comprises 15,000 to 20,000 people. Data suggested that the highest proportion of the community reside in the Perth and Kinross Council area.

Improving the lives of Gypsy/Travellers 2019-2021<sup>97</sup> (2019) states that everybody has the right to a safe and secure home. It notes that improving the lives of Gypsy/Traveller communities is a significant human-rights commitment for Scottish Government and COSLA and is crucial if deep-rooted inequalities are to be tackled and deliver a fairer Scotland. It commits the Scottish Government, through the review of national planning policy, to ensure that Gypsy/Travellers have a stronger voice, at both national and local level, in guiding the future development of their places.

More recently, the Planning (Scotland) Act 2019<sup>20</sup> contains a number of provisions supporting Gypsy/Travellers. The planning authority evidence report is to contain:

- A summary of the action taken to meet the accommodation needs of Gypsy/Travellers in the authority's area, and an analysis of the extent to which the action has helped to meet those needs; and

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<sup>96</sup> [Analysis of Equality Results from the 2011 Census \(webarchive.org.uk\)](https://web.archive.org)

<sup>97</sup> [Improving the lives of Gypsy/Travellers: 2019-2021 - gov.scot \(www.gov.scot\)](https://www.gov.scot)

- A statement on how the planning authority has sought the views of Gypsy/Travellers, including the extent to which the views expressed have been taken into account.

## Evidence Base

### Participation

Of the 14 questions in the Place Standard tool, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider ethnicity when coming to a response.

Some people from specific communities of interest and identity described finding it difficult to get involved in decisions, or having no experience of involvement at all<sup>98</sup>. For example, some asylum seekers, EU citizens, foreign language groups, and some people from different ethnic minority groups described experiences of being detached from the wider community and formal decision-making organisations and forums. They did not know about local groups or understand whether and how they could get involved.

Census data<sup>99</sup> suggests that English language skills for Gypsy/Travellers aged 3 and over were generally lower than for the population as a whole. Only 83% of Gypsy/Travellers could speak, read and write English compared to 94% of the whole population.

Respondents to the NPF4 Position Statement consultation also highlighted the benefits of green space in terms of the wellbeing of communities, and cited evidence that lower income households and Black, Asian and minority ethnic communities are disproportionately impacted by loss of green space.

It also went on to say that, in relation to policy on 20 minute neighbourhoods, it should ensure diverse needs are taken into account, it was suggested that it will be important not just to focus on people living and working in a particular place but to connect to wider organisations – including those representing Gypsy/Travellers.

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

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<sup>98</sup> [Local Governance Review: analysis of responses to Democracy Matters - gov.scot \(www.gov.scot\)](http://www.gov.scot)

<sup>99</sup> [Analysis of Equality Results from the 2011 Census \(webarchive.org.uk\)](http://webarchive.org.uk)

There was also a call for action to address inequality of opportunity to participate, with specific calls for a greater voice for children and young people and groups such as Gypsy/Travellers.

## Spaces and places

Data<sup>100</sup> accompanying the National Performance Framework Indicators noted:

- In 2019, adults from a white ethnic background were more likely to rate their neighbourhood as a very good place to live (58% of adults), compared to adults from minority ethnic groups (46% of adults).
- White Scottish people are more likely to agree (57%) than people with a minority ethnicity (51%) that there are places in interact in their neighbourhood.
- 66% of those from the white ethnic group reporting living within a five 5 minute walk of the nearest greenspace, compared to 46% of those from ethnic minorities.

## Housing and accommodation

In response to Housing 2040<sup>35</sup> engagement, stakeholders highlighted that the needs of ethnic minority older people with complex needs were not being met by current service provision, and that appropriately sized affordable houses should be built across all tenures to meet specific local and cultural needs. It goes on to note that combined 2016-2019 Scottish House Condition Survey data demonstrates that a significantly higher proportion of households with a non-white minority ethnic Highest Income Householder (HIH) were overcrowded (7%), compared to households with a white Scottish/British HIH (2%).

Participants in the 2021 review of minority ethnic housing needs<sup>101</sup> reported that location and appropriately sized accommodation, to accommodate larger family sizes and extended family living, were particularly important for some minority ethnic groups. It also noted that reasons for overcrowding can include larger household sizes and extended families living together, lower availability of housing of a sufficient size that is affordable and/or housing being outwith desired locations.

The available evidence from 2018<sup>102</sup> identified a total of 54 Gypsy/Traveller sites across Scotland, including 29 public and 25 private sites. These 54 sites provide a

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<sup>100</sup> [National Indicator Performance | National Performance Framework](#)

<sup>101</sup> [Housing needs of minority ethnic groups: evidence review - gov.scot \(www.gov.scot\)](#)

<sup>102</sup> [Gypsy/Traveller Sites in Scotland - gov.scot \(www.gov.scot\)](#)

total of 613 pitches, with the great majority of these let on a permanent basis. It went on to note that of the 19 landlords providing public Gypsy/Traveller sites, 12 reported having current waiting list applicants and/or had to turn away Gypsy/Travellers within the last year who were looking for site accommodation.

The Scottish Government published Gypsy/Travellers - accommodation needs: evidence review<sup>103</sup> in 2020. It concluded that the failure to meet the accommodation needs of Gypsy/Travellers is a key factor in the discrimination that they face, and often places them in conflict with the settled community. It went on to note that such opposition continues to present a significant barrier to further site provision. Ways to alleviate this tension and engage the wider community in the planning process should be considered.

In the response of the Equality and Human Rights Commission (the EHRC) to the UK Government's eighth periodic report to the United Nations Committee on the Elimination of All Forms of Discrimination Against Women<sup>104</sup>, the EHRC noted the lack of residential and transit accommodation across Great Britain routinely affects Gypsy/Traveller women's right to an adequate standard of living.

### Health and Wellbeing

Public Health Scotland<sup>105</sup> (last updated 2021) has reported that Scottish data suggests that minority ethnic groups, with some exceptions such as Gypsy/Travellers, have better general health than the majority of the white population. These differences can vary by disease and ethnic group. It goes on to note that there is also scope for ethnically targeted obesity and diabetes prevention strategies.

In 2011<sup>100</sup> Gypsy/Travellers in Scotland, compared to the population as a whole, were more likely to report a long-term health problem or disability and were more likely to report bad or very bad general health.

Gypsy/Traveller communities experience poorer outcomes in terms of living standards, education, health and employment, and often face extreme and persistent stereotyping and hostility as they go about their lives.

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<sup>103</sup> [Gypsy/Travellers - accommodation needs: evidence review - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/evidence-review/gypsy-travellers-accommodation-needs/evidence-review-2020/pages/11.aspx)

<sup>104</sup> [pressing-for-progress-womens-rights-and-gender-equality-in-2018-pdf.pdf \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/pressing-for-progress-womens-rights-and-gender-equality-in-2018-pdf)

<sup>105</sup> [Ethnic groups and migrants - Population groups - Public Health Scotland](https://www.phscotland.nhs.uk/ethnic-groups-and-migrants-population-groups)

## Opportunities to improve equality and eliminate discrimination on the Race characteristic

Evidence would suggest that Draft NPF4 should include measures which enable people's participation in the planning system and for the decisions taken to reflect a diversity of perspectives. There is an opportunity to build on tools such as the Place Standard and link with the forthcoming guidance on effective community engagement in Local Development Plans.

In taking steps to meet the needs of people where these are different, the Scottish Government has noted particular issues around housing and accommodation needs. There is scope for policies within Draft NPF4 to reflect those needs, particularly around the provision of larger affordable homes and the particular accommodation needs for Gypsy/Travellers.

## **Religion and Belief**

### Relationship between Planning and the Religion and Belief characteristic

Christian denominations represented the majority of the Scottish population<sup>106</sup> (54%). The next largest religion was 'Muslim' which represented over 1%, and the other religions combined (including 'Hindu', 'Buddhist', 'Sikh' and 'Jewish') represented a further 1%. 37% of the population stated they had no religion in 2011, an increase of over half a million people from 2001. 7% of people did not state their religion.

Planning Advice Note 3/2010: Community Engagement<sup>52</sup> recognises that an understanding is needed about the support particular individuals or groups require to help them engage. It notes that the needs of minority groups should be accommodated where possible, including the opportunity to access information in alternative formats such as the provision of information in alternative languages.

Of the 14 questions in the Place Standard tool, 6 of the questions (Natural Space, Facilities and Amenities, Work and Local Economy, Identity and Belonging, Feeling Safe, Influence and Sense of Control) directly ask people to consider religious belief when coming to a response.

Responses to the Scottish Household Survey in relation to the national indicator on access to green or blue space, reveals that those responding as having no religion or as Christian were more likely to live within 5 minutes of a greenspace compared to those belonging to another religion. 63.61% of Christians, compared to 48.09% of

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<sup>106</sup> [Analysis of Equality Results from the 2011 Census \(webarchive.org.uk\)](#)



those from other religions indicated they lived within 5 minutes' walk of their nearest green or blue space.<sup>107</sup>

Produced by the Faith and Place Network<sup>108</sup>, this 2016 policy briefing sets out recommendations for planning authorities in England and Wales based on the five themes of 'understanding one another', 'faith groups and community', 'equality and diversity', 'sharing creative practice' and 'the planning framework'.

### Opportunities to improve equality and eliminate discrimination on the Religion and Belief characteristic

Evidence would suggest that Draft NPF4 should include measures which enable people's participation in the planning system and for the decisions taken to reflect a diversity of perspectives. There is an opportunity to build on tools such as the Place Standard and link with the forthcoming guidance on effective community engagement in Local Development Plans.

### **Gender Reassignment**

We have only been able to gather limited information regarding this protected characteristic.

In a survey, less than one third of transgender and non-binary people said there were enough places where they could socialise safely.<sup>109</sup>

54% of trans respondents avoided being open about their gender identity in 'the park' for fear of a negative reaction from others<sup>110</sup>

"Another factor leading to non-binary people and women feeling uncomfortable in Glasgow Parks is the lack of public toilets. 55.4% highlighted that there were no toilets in the park they most frequently visited, and 35.8% of participants indicated that the provision of more toilets would encourage them to visit parks more frequently and for longer periods of time."<sup>111</sup>

### **National Developments**

National developments are those that strongly support the delivery of the spatial strategy, i.e. are 'needed'. Their identification is helpful to those delivering and

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<sup>107</sup> Scottish Government Equality Evidence Finder <https://scotland.shinyapps.io/sg-equality-evidence-finder/>

<sup>108</sup> [HUM021015AR-Policy-Briefing-final.pdf \(faithsforum.com\)](#)

<sup>109</sup> [Life in Scotland for LGBT Young People, FINAL March 2018.cdr \(lgbtyouth.org.uk\)](#)

<sup>110</sup> National LGBT Survey Research Report (Government Equalities Office) 2018 [National LGBT survey: research report \(publishing.service.gov.uk\)](#)

<sup>111</sup> Glasgow: A Feminist City? Young Women Lead Report 2021



hosting them including: public, commercial, and third sector bodies; and communities.

The national developments proposed in the Draft NPF4 are aligned to wider Scottish Government policy as far as is reasonable to do so at this time, to strengthen the connection between the NPF4 spatial strategy and delivery.

Over 250 national development suggestions were received and were considered against four criteria:

**Climate change:** The development will help to reduce emissions, contributing to Scotland's target of net zero emissions by 2045, will be emissions neutral, or emissions negative.

**People:** The development will support the health, wellbeing, sustainability, and quality of life of our current and future population.

**Inclusive Growth:** The development will contribute to sustainable economic growth that helps to reduce poverty and inequality across Scotland.

**Place:** The development will protect or enhance the quality of a place or improve biodiversity.

The Draft NPF4 includes 18 proposed National Developments:

- Central Scotland Green Network
- National Walking, Cycling and Wheeling Network
- Urban Mass/Rapid Transport Networks
- Urban Sustainable, Blue and Green Drainage Solutions
- Circular Economy Materials Management Facilities
- Digital Fibre Network
- Islands Hub for Net Zero
- Industrial Green Transition Zones
- Pumped Hydro Storage
- Hunterston Strategic Asset
- Chapelcross Power Station Redevelopment
- Strategic Renewable Electricity Generation and Transmission Infrastructure
- High Speed Rail

- Clyde Mission
- Aberdeen Harbour
- Dundee Waterfront
- Edinburgh Waterfront
- Stranraer Gateway

## A.4. Recommendations and Conclusions

This EQIA has supported the development of the Draft NPF4. In taking forward this draft, the Scottish Government has considered the three elements of the Public Sector Equality Duty: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not. The EQIA has helped highlight the potential issues which may impact disproportionately on those with particular protected characteristics.

### Participation

Evidence shows that people want to be involved in shaping the places where they live, work or stay. The Scottish Government wishes to encourage people from all protected groups to participate in public life by engaging in shaping the way their communities develop and being involved more proactively in decision-making. However, as noted in the Social Capital in Scotland: Report<sup>6</sup> (2020), levels of perceived influence over local decision making have been consistently low over recent years, and across all subgroups of the population. New provisions in the 2019 Planning Act enhance the opportunities for people to become more involved in planning, and importantly for planning authorities to set out how those views have been taken into account.

As noted above, the Place Standard tool provides a positive starting point for the gathering of people's views across the protected characteristics on the quality of the place they live. Practical examples of the use of the tool show it working in a number of settings, and with a range of societal groups.

Gathering a range of views and perspectives requires a more collaborative approach to engagement and this is reflected in policy in Draft NPF4. However, the Scottish Government recognises that certain factors disproportionately impact people due to a protected characteristic, this may be access to suitable venues, low use of the internet, or social and cultural factors. Within the overall framework of the engagement policy, when developing guidance on effective community engagement in local development plans, this will be reflected.

### Housing and accommodation

Housing is a key issue for Draft NPF4. Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people is one of the six high level outcomes. Ministers are also to have regard to any national strategy and action plan for housing prepared by them. These issues were reflected in the NPF4: Call for Ideas and responses to the NPF4: Position Statement.

Housing and accommodation needs have particularly been raised under the age, disability and race characteristics but are important across a range of societal subgroups.

Draft NPF4 aims to address issues of current policy and of limited resources being focused on debates over calculations and methodologies of housing numbers. It looks to support delivery of homes over a longer timeframe of 10 years, enabling a more co-ordinated and considered approach, aligned with key drivers of social justice, infrastructure provision and climate change. Resource capacity in future should therefore focus on the quality, location and delivery of new homes and improving places.

It also includes a policy that proposals for new homes that improve affordability and choice should be supported. An equalities-led approach to addressing identified gaps in provision should be taken, informed by the Evidence Report or Local Housing Strategy, whichever is most up-to-date. This could include: self-provided homes; accessible, adaptable and wheelchair accessible homes; build to rent; affordable homes; a range of size of homes such as those for larger families (which may have a positive outcome for certain black and ethnic minority groups); homes for older people; people undertaking further and higher education; and other specialist groups. Development proposals for homes should be of a high quality and contribute to making great places. Their design should reflect the 6 qualities of successful places. Homes should be adaptable to changing and diverse needs and lifestyles.

We know that many Gypsy/Travellers prefer to live on private sites, which can help support their independence, self-sufficiency and security. But they have often found it difficult to access the planning system and get the appropriate permission to develop their own sites.

Draft NPF4 also recognises that Gypsy/Travellers refers to a number of distinct groups who consider the travelling lifestyle part of their ethnic identity. It has introduced a revised policy for public or private, permanent or temporary sites on land not identified for this use in the development plan. Making provision for the development of private sites can help Gypsy/Travellers to maintain their traditional lifestyle.

## Spaces and Places

Recent evidence has reflected upon how development of the built environment has not captured and reflected how different people use spaces and places. The evidence is particularly strong under both the disability and sex characteristics.

Enhancements to engagement with people with a range of perspectives should provide a broader evidence base for the development of local places. And as noted above, new provisions in the Planning (Scotland) Act (2019) enhance the opportunities for people to become more involved in planning, and importantly set out how those views have been taken into account is to be reported.

Taking an infrastructure first approach will support the provision of the infrastructure, services and facilities that are necessary to create liveable and sustainable places. Infrastructure in a broad sense is required by all communities, and by putting infrastructure considerations at the heart of land use planning decisions, this will help

to support the provision of infrastructure that is needed to meet the needs of communities, which would include the different groups that make up those communities.

The policy basis in Draft NPF4 is that development proposals that are consistent with the principles of 20 minute neighbourhoods should be supported. These Draft NPF4 policies on local living can provide an opportunity to shape places which act as complete, connected and compact neighbourhoods, designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle of their home. This should lead to the reduction of barriers to people's access to equal opportunities in the built environment, and to green and open space and play opportunities.

Draft NPF4 goes on to state that development proposals that are poorly designed, including those that are not consistent with the six qualities of successful places, should not be supported. Draft NPF4 contains an updated policy on design, quality and place requiring plans and proposals to reflect the six qualities of successful places.

- **Designed for lifelong health and wellbeing:** supporting safety and improving mental and physical health.
- **Safe and pleasant:** supporting safe, pleasant and welcoming natural and built spaces.
- **Well connected and easy to move around:** supporting accessible networks of all scales.
- **Distinctive:** supporting attention to local architectural styles, townscapes and landscapes - acknowledging the sense of place and identity that people feel for their cultural heritage and historic environment.
- **Sustainable:** supporting net zero, nature-positive, and climate-resilient places - creating healthier, attractive, sustainable places to live, invest, work and play.
- **Adaptable:** supporting commitment to investing in the long term value of buildings, streets and spaces. Reusing and repurposing existing buildings and assets can also support our net zero ambitions and the circular economy.

These qualities recognise that issues around safety and access are important elements in designing a successful place.

Accessible, high quality natural and civic spaces can be used by communities for many activities: exercise and recreation, play, sport, culture and connecting with nature. Blue and green infrastructure can support lifelong health and wellbeing, climate resilience, flood risk management, temperature regulation in urban areas, reduction of air and noise pollution, biodiversity and nature networks, while also supporting good, green jobs.

The planning system should support development that expands and strengthens networks of blue and green infrastructure, to help us respond to our climate change and biodiversity goals, and support our placemaking ambitions.

## Connectivity

Connectivity is not only about transport and travel, but also digital connectivity and the day to day interactions which were missing to a certain extent during the recent lockdown.

Being older or disabled, living in a deprived area or living in social housing were risk factors for exclusion from access to digital services. The planning system should continue to support the roll-out of digital infrastructure across all of Scotland, ensuring that policies recognise the importance of future-proofing infrastructure provision whilst addressing impacts on local communities and the environment. Local development plans should support the delivery of digital infrastructure, particularly in areas with gaps in connectivity and barriers to digital access.

Draft NPF4 provides an updated policy on sustainable transport and active travel. It aims to reduce the need to travel by discouraging applications for significant travel generating uses at locations which rely on the car. Provision of active travel is actively encouraged and we have proposed a national development which supports a national walking, cycling and wheeling network. Policies set out that we want to reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices.

There is the opportunity for local development plans to reduce the need to travel unsustainably by prioritising locations for future development that can be accessed by sustainable modes.

The planning system should support development that will contribute to the creation of walkable, liveable and thriving places that provide and encourage sustainable travel options, provide communities with local access to the wide range of facilities, services, work and opportunities for socialising, leisure and play activities that they need to support a healthier and flourishing community.

## Health and Wellbeing

Improving the health and wellbeing of the people of Scotland is one of the six high level outcomes of Draft NPF4. Planning and places play a crucial role in supporting health and physical activity, for example with our support for 20 minute neighbourhoods, greenspace, active travel and in managing access to food, food production, community growing, etc.

Outdoor spaces for play, sport and recreation can make a significant contribution towards creating more liveable and healthier places. Children experience a range of health, wellbeing and educational benefits from outdoor play, and learning in, and connecting with nature.

Places are important for physical and mental health and overall wellbeing. The provision of health and social care facilities and infrastructure to meet the needs of the community should be a key consideration for the planning system.

Development proposals should not be supported where significant adverse health effects are likely to occur. A health impact assessment will be required for all proposed development that is considered likely to generate significant health effects or is within the categories of national developments, or major developments, or is EIA development. Development proposals that would have a significant adverse effect on air quality should not be supported.

55% of people living in the most deprived decile in Scotland are estimated to live within 500 metres of derelict land, compared to 11% of people in the least deprived decile. There are numerous indicators that vacant and derelict land is associated with negative impacts on health and wellbeing.

In response to issues around food deserts, and lack of access to healthy food especially in some deprived areas, Draft NPF4 contains a new policy on neighbourhood shopping. Draft NPF4 highlights that consideration should be given to where a retail proposal will alleviate a lack of convenience goods/fresh healthier food and drink provision, especially in disadvantaged or remoter areas.

Draft NPF4 recognises that the reuse of vacant and derelict land and properties can contribute to climate change targets and support biodiversity, health and wellbeing improvements and resilient communities by providing much needed greenspace, growing spaces and other community benefits. The planning system should prioritise the use of vacant and derelict land and properties, including supporting appropriate temporary uses where proposals for permanent development are unlikely to be imminent.

### Human Rights considerations

Eliminating discrimination and promoting equality is one of NPF4's six high level outcomes.

Whilst there is not currently a specific Human Rights Impact Assessment to complete for Draft NPF4, human rights considerations should be embedded throughout the policy making process.

Scotland's National Performance Framework now includes the human rights outcome – 'We respect, protect and fulfil human rights and live free from discrimination'. The outcome includes three indicators, one of which is measured as the percentage of respondents who agree with the statement "I can influence decisions affecting my local area", as measured by the Scottish Household Survey.

In addition, in preparing the NPF, Ministers must have regard to any land rights and responsibilities statement prepared under section 1 of the Land Reform (Scotland) Act 2016. Principle 1 of the Land Rights and Responsibilities Statement states: 'The

overall framework of land rights, responsibilities and public policies should promote, fulfil and respect relevant human rights in relation to land’.

We obtained limited additional evidence on issues that may impact on people’s human rights in Scotland through the Call for Ideas or the consultation on the Position Statement.

The obligations set out in international human rights treaties are legally binding as a matter of public international law and (unless specific exceptions are made) they apply to the UK as a whole. Public authorities in Scotland, as in other parts of the UK, should therefore act in a way that gives proper effect to these rights, in accordance with the undertakings entered into by the UK when it ratified the relevant treaties. Linked to the purpose of planning set out in the Planning (Scotland) Act (2019) and linkages with the National Performance Framework and the land rights and responsibilities statement, our overarching policy confirms that planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality.

Specifically, enhanced engagement opportunities should support the National Performance Framework’s Human Rights Outcome indicator for people to influence decisions which affect them.

Draft NPF4 also provides a real opportunity to expand on our current planning policy to support Gypsy/Travellers in their human rights to travel and in their aspirations to invest in their own homes, taking into account research on the distribution of existing sites across Scotland, as well as the provisions of the Planning (Scotland) Act 2019.

The Scottish Government has accepted all 30 of the progressive, bold and ambitious recommendations from the National Taskforce for Human Rights Leadership for a new human rights framework for Scotland. As part of taking forward these recommendations, a new Human Rights Bill will be introduced to Parliament during this parliamentary session and we will consult on the Bill in the coming year.

The Bill will give effect in Scots law to a wide range of internationally recognised human rights - belonging to everyone in Scotland - as far as possible within devolved competence.

The Bill will include economic, social, and cultural rights through the incorporation, so far as possible within competence, of the International Covenant on Economic, Social and Cultural Rights (ICESCR), alongside three other international frameworks for the empowerment of women, disabled people and minority ethnic people. The Bill will also include a right to a healthy environment, a right for older people to ensure equal access to their human rights so that they can live a life of dignity and independence, and provision to provide equal access to everyone, including LGBTI people, to the rights contained in the Bill. The Bill will also re-affirm the rights in the Human Rights Act 1998.



## Conclusion

This document has reviewed the evidence for groups with protected characteristics that might be particularly affected by the policies in Draft NPF4. The Scottish Government has set out policies intended to address these impacts.

The planning system needs to recognise the different needs of individuals and communities. Building a planning system that draws on all sectors of society should be based on the principle of collaboration and participation, giving a voice to groups potentially affected by any changes, together with a recognition that such voices should frame the decisions that are made at a national, regional and local level.

### **A.5. Monitoring and Review**

We will review this impact assessment following the consultation on the Draft NPF4. Provisions exist within the Planning (Scotland) Act 2019 for Ministers to review NPF4 within 10 years. This will provide an opportunity for the revision of the spatial framework and policies.

Scottish Government

November 2021

## Appendix B. Child Rights and Wellbeing Impact Assessment

<b>CRWIA title: Draft National Planning Framework 4</b>	
<b>Publication date:</b>	
<b>Summary of policy aims and desired outcomes</b>	<p>The Scottish Government is revising the National Planning Framework (NPF), a long term plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth.</p> <p>The current National Planning Framework (NPF3<sup>1</sup>) was published in 2014 and will remain in place until a fourth NPF (NPF4) is adopted. NPF4 will guide spatial development, set out Scotland’s national planning policies, and will designate certain developments or classes of development as ‘national developments<sup>2</sup>’ for which Ministers have established a need in principle.</p> <p>NPF4 will have the status of the development plan for planning purposes. This means that its policies should inform day to day decision making in the planning system. It will also be important for communities as they develop their Local Place Plans, guide local development plans and will be relevant to regional spatial strategies.</p> <p>In terms of policy, NPF4 is linked to the outcomes of the National Performance Framework<sup>3</sup>. Planning and Architecture’s role in delivering the 11 national outcomes has recently been published<sup>4</sup>. It sets out that:</p> <p>‘Involvement of children and young people in planning is being strengthened through Scotland’s new Planning Act, along with clear commitments to open space and opportunities for play. The Place Standard tool, including</p>

<sup>1</sup> [National Planning Framework 3 - gov.scot \(www.gov.scot\)](http://www.gov.scot/publications/national-planning-framework-3-2014-2018-2020-2024-2028-2032-2036-2040-2044-2048-2052-2056-2060-2064-2068-2072-2076-2080-2084-2088-2092-2096-2100-2104-2108-2112-2116-2120-2124-2128-2132-2136-2140-2144-2148-2152-2156-2160-2164-2168-2172-2176-2180-2184-2188-2192-2196-2200-2204-2208-2212-2216-2220-2224-2228-2232-2236-2240-2244-2248-2252-2256-2260-2264-2268-2272-2276-2280-2284-2288-2292-2296-2300-2304-2308-2312-2316-2320-2324-2328-2332-2336-2340-2344-2348-2352-2356-2360-2364-2368-2372-2376-2380-2384-2388-2392-2396-2400-2404-2408-2412-2416-2420-2424-2428-2432-2436-2440-2444-2448-2452-2456-2460-2464-2468-2472-2476-2480-2484-2488-2492-2496-2500-2504-2508-2512-2516-2520-2524-2528-2532-2536-2540-2544-2548-2552-2556-2560-2564-2568-2572-2576-2580-2584-2588-2592-2596-2600-2604-2608-2612-2616-2620-2624-2628-2632-2636-2640-2644-2648-2652-2656-2660-2664-2668-2672-2676-2680-2684-2688-2692-2696-2700-2704-2708-2712-2716-2720-2724-2728-2732-2736-2740-2744-2748-2752-2756-2760-2764-2768-2772-2776-2780-2784-2788-2792-2796-2800-2804-2808-2812-2816-2820-2824-2828-2832-2836-2840-2844-2848-2852-2856-2860-2864-2868-2872-2876-2880-2884-2888-2892-2896-2900-2904-2908-2912-2916-2920-2924-2928-2932-2936-2940-2944-2948-2952-2956-2960-2964-2968-2972-2976-2980-2984-2988-2992-2996-3000)

<sup>2</sup> [national-developments-factsheet-2020-november.pdf \(transformingplanning.scot\)](https://www.gov.scot/publications/national-developments-factsheet-2020-november.pdf)

<sup>3</sup> <https://nationalperformance.gov.scot>

<sup>4</sup> <https://www.gov.scot/publications/planning-and-architecture-contribution-to-national-outcomes/>

	<p>enhanced participation tools, will further support children and young people to have an influence over the future of their places, helping to address issues such as child poverty, social isolation and wellbeing.’</p> <p>NPF4 will look to rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions. A place based approach is at the heart of creating a more sustainable and fair Scotland.</p> <p>NPF4 will look to deliver on six high level outcomes which include:</p> <ul style="list-style-type: none"> <li>Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people;</li> <li>Improving the health and wellbeing of people living in Scotland; and</li> <li>Improving equality and eliminating discrimination.</li> </ul> <p>It will also include land use planning policies supporting key issues supporting children and young people’s lives, such as engagement, local living, housing, infrastructure (including education provision), spaces and places, access to play and recreation, health and wellbeing and connectivity.</p>
<p><b>Executive summary</b></p>	<p>The Scottish Government is revising the National Planning Framework (NPF), a long term plan for Scotland that sets out how the Scottish Government’s approach to planning and development will help to achieve a net-zero, sustainable Scotland by 2045. Development of the fourth National Planning Framework (NPF4) began in late 2019. The participation of children and young people has been interwoven into the engagement strategy from the beginning, with an early engagement session with Members of the Scottish Youth Parliament and rural schools, to workshops on the NPF4 Position Statement with children and young people.</p> <p>Children and Young People have particularly told us that:</p> <ul style="list-style-type: none"> <li>They want to be involved in the decisions about the places they live. This includes children who are also Gypsy/Travellers;</li> <li>Issues around housing are important, its affordability and associated infrastructure;</li> </ul>

	<p>Access to employment opportunities are key;</p> <p>Children want a return to play, more play and better play. With better quality spaces;</p> <p>Connectivity is important, particularly access to public transport and its affordability but also digital connectivity;</p> <p>They value places which are green and allow them to be physically active.</p> <p>Through the statutory purpose of planning, NPF4 is linked to the national outcomes in the National Performance Framework and will contribute to delivery of:</p> <p>The United Nations Sustainable Development Goals;</p> <p>The SHANARRI wellbeing indicators; and</p> <p>Relevant Articles set out in the United Nations Convention on the Rights of the Child (UNCRC).</p> <p>To summarise, NPF4 has the potential to have a positive impact on the rights of all children as it will help to deliver a fairer and more inclusive Scotland, where every child and young person has the opportunity to fulfil their potential. NPF4 aims to ensure that the places that children and young people live, play, go to school and work are shaped with their participation and are accessible to all. Ultimately, we consider that NPF4 complies with UNCRC requirements.</p>
<p><b>Background</b></p>	<p>The Child Rights and Wellbeing Impact Assessment (CRWIA) is used to identify, research, analyse and record the impact of a proposed policy on children's human rights and wellbeing. It is to be used on all new policy which impacts children, not just children's services. The impacts can be direct or indirect; short, medium or long-term; and positive, negative or neutral.</p> <p>The Planning (Scotland) Act 2019 provides for a new style National Planning Framework to be prepared by the Scottish Government. The fourth National Planning Framework (NPF4) will:</p> <p>Incorporate detailed national policy on a number of planning topics. For the first time, spatial and thematic planning policies will be addressed in one place;</p>

Have the status of the development plan for planning purposes. Its policies will have a stronger role in informing day to day decision making; and

Address the following high level outcomes:

- Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people
- Improving the health and wellbeing of people living in Scotland
- Increasing the population of rural areas of Scotland
- Improving equality and eliminating discrimination
- Meeting any targets relating to the reduction of emissions of greenhouse gases
- Securing positive effects for biodiversity.

Development of NPF4 began late in 2019 with a workshop session with the Scottish Youth Parliament. Through the period January to April 2020 we sought early views on NPF4, both in terms of the spatial strategy for Scotland and on the more detailed policies on specific topics, currently in the Scottish Planning Policy. Engagement included:

The publication of Scotland2050 Think Pieces, one of which reflected on the Scottish Youth Parliament workshop and online survey<sup>5</sup>

A roadshow around Scotland which included visiting schools in Aberfeldy<sup>6</sup> and Buckie<sup>7</sup>; and

The publication of an NPF4 Integrated Impact Assessment Scoping Report<sup>8</sup> setting out the initial evidence on the potential impact on children and young people.

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<sup>5</sup> <https://www.transformingplanning.scot/media/1263/tp-report-on-whatsyourtake.pdf>

<sup>6</sup> <https://www.transformingplanning.scot/media/1847/roadshow-breadalbane-academy-summary-note.pdf>

<sup>7</sup> <https://www.transformingplanning.scot/media/1849/roadshow-buckie-summary-note.pdf>

<sup>8</sup> <https://www.transformingplanning.scot/national-planning-framework/resources/>

	<p>We had anticipated laying a Draft NPF4 in the Scottish Parliament in September 2020, but given the impact of the Coronavirus (COVID-19) emergency and many people's and organisations' capacity at that time, delay was been inevitable and the timetable was amended.</p> <p>To provide an overview of the Government's thinking, in November 2020 we published a Position Statement<sup>9</sup> setting out what the likely policy changes might be in the Draft NPF4. This also saw the publication of an update to the NPF4 Integrated Impact Assessment Scoping Report. The Position Statement was supported by the commissioning of workshops from PAS with children and young people. The output was published in June 2021.</p> <p>Draft NPF4 was laid in the Scottish Parliament on 10 November 2021. At the same time as Parliament is considering Draft NPF4, the Scottish Government will carry out a public consultation. We anticipate producing a final version of NPF4 for approval and adoption around summer 2022.</p> <p>Any changes to the adopted NPF4 will be reflected in a finalised impact assessment.</p>
<p><b>Scope of the CRWIA, identifying the children and young people affected by the policy, and summarising the evidence base</b></p>	<p>The likely effects of the policies were informed by a range of evidence, including public consultation and stakeholder engagement. Scottish Government officials also examined evidence from a range of studies, reports and surveys, including:</p> <ul style="list-style-type: none"> <li>Growing Up in Scotland<sup>10</sup></li> <li>Beyond4Walls<sup>11</sup> (2016)</li> <li>YoungScot Survey<sup>12</sup> (2017)</li> </ul>

<sup>9</sup> <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/>

<sup>10</sup> [Growing Up in Scotland | following the lives of Scotland's children](#)

<sup>11</sup> [Children in Scotland](#)

<sup>12</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2017/06/planning-review-young-scot-survey-results-june-2017/documents/planning-review-young-scot-survey-results-pdf/planning-review-young-scot-survey-results-pdf/govscot:document/Planning%20Review%20Young%20Scot%20survey%20results.pdf>

	<p>Hard to Reach, Easy to Ignore<sup>13</sup> (2017)</p> <p>Young Gypsy/Travellers Discuss the United Nations Convention on the Rights of the Child - Children and Young People's Evidence Bank<sup>14</sup> (2018)</p> <p>Girls in Scotland 2018<sup>15</sup> (2018)</p> <p>Every Child, Every Chance<sup>16</sup> (2018)</p> <p>Young People and the Highlands and Islands: Maximising Opportunities<sup>17</sup> (2018)</p> <p>Child Poverty Strategy documents<sup>18</sup> (2019)</p> <p>Scottish Household Survey: Annual Report 2018<sup>19</sup> (2019)</p> <p>National Transport Strategy Review Young Scot<sup>20</sup> (2019)</p> <p>Climate Ready Scotland: climate change adaptation programme 2019-2024<sup>21</sup> (2019)</p> <p>Children and parents: media use and attitudes report<sup>22</sup> (2019)</p> <p>Young people's participation in decision making: attitudes and perceptions<sup>23</sup> (2020)</p>
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<sup>13</sup> <http://whatworksscotland.ac.uk/publications/hard-to-reach-or-easy-to-ignore-promoting-equality-in-community-engagement-evidence-review/>

<sup>14</sup> [Young Gypsy/Travellers Discuss the United Nations Convention on the Rights of the Child - Children and Young People's Evidence Bank](#)

<sup>15</sup> <https://www.girlguidingscotland.org.uk/wp-content/uploads/2020/08/Girls-in-Scotland-survey-2018.pdf>

<sup>16</sup> [Every child, every chance: tackling child poverty delivery plan 2018-2022 - gov.scot \(www.gov.scot\)](#)

<sup>17</sup> <https://www.hie.co.uk/research-and-reports/our-reports/2018/may/31/yp-research/>

<sup>18</sup> <https://www.gov.scot/publications/child-poverty-strategy-documents/>

<sup>19</sup> <https://www.gov.scot/publications/scotlands-people-annual-report-results-2018-scottish-household-survey/>

<sup>20</sup> <https://youngscot.net/ysobservatory/national-transport-review/>

<sup>21</sup> [Climate Ready Scotland: climate change adaptation programme 2019-2024 - gov.scot \(www.gov.scot\)](#)

<sup>22</sup> [Children and parents: media use and attitudes report 2019 - Ofcom](#)

<sup>23</sup> [Young people's participation in decision making: attitudes and perceptions - gov.scot \(www.gov.scot\)](#)

	<p>Population Projections for Scottish Areas 2018-based<sup>24</sup> (2020)</p> <p>Girls in Scotland 2020<sup>25</sup> (2020)</p> <p>Make Space for Girls<sup>26</sup> (2020)</p> <p>Health Inequalities: Peer research into the role of communities<sup>27</sup> (2020)</p> <p>Challenges from the frontline<sup>28</sup> (2020)</p> <p>Population Projections for Scottish Areas 2018-based<sup>29</sup> (2020)</p> <p>Democracy Matters to Children<sup>30</sup> (2020)</p> <p>Travel and Transport in Scotland 2019<sup>31</sup> (2020)</p> <p>Social Attitudes Survey 2019: Attitudes to Young People<sup>32</sup> (2020)</p> <p>NPF4 Call for ideas: Analysis of responses<sup>33</sup> (2020)</p> <p>If not now, when? - Social Renewal Advisory Board report<sup>34</sup> (2021)</p>
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<sup>24</sup> <https://www.nrscotland.gov.uk/files//statistics/population-projections/sub-national-pp-18/pop-proj-principal-2018-report.pdf#:~:text=The%20population%20of%20Scotland%20is%20projected%20to%20increase,than%20that%20seen%20in%20the%20last%2010%20years/>

<sup>25</sup> [GGS\\_GirlsInScotland\\_2020.pdf \(girlguidingscotland.org.uk\)](https://www.girlguidingscotland.org.uk/GGS_GirlsInScotland_2020.pdf)

<sup>26</sup> [Make Space for Girls - Summary of Research findings December 2020](#)

<sup>27</sup> [Health-Inequalities-Report-Chris-Ross.pdf \(childreninscotland.org.uk\)](#)

<sup>28</sup> [Challenges from the frontline - revisited \(nspcc.org.uk\)](#)

<sup>29</sup> <https://www.nrscotland.gov.uk/files//statistics/population-projections/sub-national-pp-18/pop-proj-principal-2018-report.pdf>

<sup>30</sup> [Democracy Matters Consultation - Children's Parliament \(childrensparliament.org.uk\)](#)

<sup>31</sup> <https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-2019-results-from-the-scottish-household-survey/>

<sup>32</sup> <https://www.gov.scot/publications/scottish-social-attitudes-2019-attitudes-young-people/pages/2/>

<sup>33</sup> <https://www.gov.scot/publications/npf4-analysis-reponses-call-ideas/>

<sup>34</sup> [If not now, when? - Social Renewal Advisory Board report: January 2021 - gov.scot \(www.gov.scot\)](#)



	<p>Progress Review of Scotland’s Play Strategy<sup>35</sup> (2021)</p> <p>NPF4: Position Statement: Analysis of Responses<sup>36</sup> (2021)</p> <p>NPF4: Position Statement: Youth Engagement<sup>37</sup> (2021)</p> <p>Poverty in Scotland<sup>38</sup> (2021)</p> <p>Public Health Scotland<sup>39</sup> (2021)</p> <p>NPF4 has the potential to have a positive impact on the rights of all children as it will help to deliver a healthier, safer, fairer and more inclusive Scotland where every child and young person has the opportunity to fulfil their potential. NPF4 aims to ensure that the places that children and young people live, play, go to school and work are shaped with their participation and are accessible to all.</p> <p>As a result of the policies in Draft NPF4, whilst there will be opportunities for communities to be involved not everyone will always agree with development proposed,</p> <p>Ultimately, we consider that Draft NPF4 complies with UNCRC requirements.</p>
<p><b>Children and young people’s views and experiences</b></p>	<p>Engaging with children and young people has been interwoven into the development of NPF4 policies at each step.</p> <p>Engaging Members of the Scottish Youth Parliament (October 2019)</p> <p>2050 Think Piece: #WhatsYourTake (Liam Fowley MYSP)</p> <p>NPF4: Call for Ideas: direct engagement with schools in Aberfeldy and Buckie (early 2020)</p>

<sup>35</sup> <https://www.playscotland.org/resources/print/Play-Scotland-Play-Strategy-Review-Play-in-Covid-2021.pdf>

<sup>36</sup> <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement-analysis-responses-consultation/pages/1/>

<sup>37</sup> [Position Statement | Transforming Planning](#)

<sup>38</sup> [Poverty in Scotland 2021 | JRF](#)

<sup>39</sup> <https://www.publichealthscotland.scot/publications/national-planning-framework-4-briefing-on-health-and-proposed-national-developments/>

	<p>NPF4: Position Statement: Youth Engagement (2021)</p> <p>We have also been aware of a number of surveys, reports and research which have drawn out the lived experience of children and young people.</p>
<p><b>Key Findings, including an assessment of the impact on children’s rights, and how the measure will contribute to children’s wellbeing</b></p>	<p>Key findings are set out under policy themes.</p> <p><b>Demographics</b></p> <p>Whilst the total population of Scotland has grown over the last 35 years, the proportion of children (0 to 15 year olds) in the population has decreased steadily from 22% in 1983 to 17% in 2019. It has been reported<sup>40</sup> that in 2019, there were 867,345 children aged 15 and below in Scotland.</p> <p>Data in Population Projections for Scottish Areas published in 2020 would indicate that the number of children is projected to increase in 3 councils out to 2028. These are Midlothian, East Dunbartonshire and East Renfrewshire.</p> <p><b>Participation</b></p> <p>A survey undertaken by YoungScot (2017) to accompany Places, People and Planning concluded that the majority of young people feel they should be involved in planning in their local area and that their local councils should look at ways to support children and young people to do this.</p> <p>This view is supported in Young Gypsy/Travellers Discuss the United Nations Convention on the Rights of the Child - Children and Young People’s Evidence Bank (2018) where recommendations include that there should be more opportunities for young Gypsy/Travellers to take part in decision making and have their voices heard.</p> <p>This is also reflected in Health Inequalities: Peer research into the role of communities (2020) which noted that children and</p>

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<sup>40</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/impact-assessment/2021/06/child-disability-payment-amendment-regulations-draft-child-rights-wellbeing-impact-assessment/documents/child-disability-payment-amendment-regulations-draft-child-rights-wellbeing-impact-assessment/child-disability-payment-amendment-regulations-draft-child-rights-wellbeing-impact-assessment/govscot%3Adocument/child-disability-payment-amendment-regulations-draft-child-rights-wellbeing-impact-assessment.pdf>

young people want to be involved in decisions about the places they live.

Democracy matters to Children (2020) also noted that 'children's paths to meaningful involvement in decision-making are currently limited and many children have limited or no experience of participation in democratic processes'. It identified a number of local issues as ones in which children wanted to have a say – this included planning and the built environment.

Responses to the Position Statement called for action to address inequality of opportunity to participate, with specific calls for a greater voice for children and young people and groups such as Gypsy/Travellers.

However, this desire may be frustrated. For example, Hard to Reach, Easy to Ignore (2017) noted that language barriers, lack of confidence and dominant characters can discriminate against some people during community engagement, specifically including young people.

The 2019 Social Attitudes Survey highlighted that a majority of adults felt that young people aged 16 to 18 should have 'a great deal' or 'quite a lot' of say in decisions that affect their lives. The proportion believing this for those aged 11 to 15 was much smaller.

However, 2021 National Performance Framework - disability perspective: analysis found that fewer disabled young people agreed that adults were good at taking their views into account than non-disabled young people in 2019 (54% vs 62%).

### **Housing**

Beyond4Walls (2016) reported that the need for good quality housing was regarded as essential, with many of the young people believing that housing must be affordably heated, have space for them to study, have Wi-Fi and be a place they feel safe. Young people also identified the importance of having a voice in their own community and good transport links.

The PAS NPF4 Youth Engagement Report (2021) found that issues around housing are important, including its affordability and associated infrastructure.

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

A review of key literature by Public Health Scotland (2021) noted that damp and cold homes can lead to and exacerbate respiratory conditions and diseases and can have a negative impact on people's mental health and wellbeing. The poor health outcomes are increased for certain groups of the population, such as young children.

### **Spaces and places**

Children want a return to play, more play and better play. This was children and young people's overwhelming response to a consultation on play undertaken by Play Scotland in early 2021. It went on to note that children wish to play in parks and natural environments such as the beach and woods, and participate in a wide range of physical activities such as football, swimming, dancing and cycling.

The Understanding Society COVID-19 (2020) study reported that young people (aged 10 to 16 years) participating in a small number of workshops in Scotland identified lack of access to the outdoors as one of the main challenges they experienced during lockdown. These young people felt that the restriction on parks and limited opportunities to access the outdoors had affected their health and wellbeing.

Health Inequalities: Peer research into the role of communities (2020) reported that children wanted to:

Improve the quality of our green spaces;

Deal with vandalism and regenerate abandoned spaces;  
and

Use planning processes to get support for healthier shops and restaurants to set up in our communities.

Democracy Matters for Children (2020) noted the following:

one of the most prominent themes was the importance of the physical environment for children. Children frequently want 'lots of green spaces' and 'more places to play'

	<p>'protected wildlife' and provisions in place around personal safety.</p> <p>on leisure and socialising, children were keen for spaces for people to spend time socialising.</p> <p>the children valued places to be physically activity both in and outdoors.</p> <p>With regard to facilities such as skate parks, etc, Making Space for Girls (2020) notes that such spaces are dominated by boys and that girls may not have been asked what they want.</p> <p>The Girls in Scotland (2018) survey, undertaken by Girl Guides Scotland, showed that 23% of girls said that their area had few, or no community facilities. The follow up survey in 2020 noted personal safety as being a serious concern for girls.</p> <p>Responses to consultations on the development of NPF4 included the following that planning should consider young people, including through providing youth clubs and other facilities for teenagers.</p> <p>The NSPCC Report Challenges from the Frontline – Revisited (2020) noted that intensive family support should be community based: support must be explicitly connected to, or even housed in, locations that work for local families and the community, such as schools, health centres, village halls and sports centres. Communities must have a say in where support is located.</p> <p><b>Connectivity</b></p> <p>Around half of children (52%) walked to school, 19% travelled by bus and around a quarter (25%) travelled by car. This differed by age, with younger children more likely to walk to school than older ages, while older children were more likely to catch a bus.</p> <p>Engagement undertaken with Young Scot to inform the National Transport Strategy revealed that key issues for young people include the availability and cost of public transport, particularly to further and higher education, and personal safety when using services.</p>
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This would appear to confirm the Girls in Scotland (2018) survey, undertaken by Girl Guides Scotland, which showed that 55% of girls said public transport could be better.

The Understanding Society COVID-19 (2020) study noted that across all age groups (primary, secondary and post-secondary), 9% of students whose parents/carers were unemployed did not have access to an electronic device, compared with 3% of students whose parents/carers were employed or employed and furloughed.

### **Inequalities**

Every Child, Every Chance (2018) recognises that to tackle poverty overall it is necessary to focus on 'priority families' at high risk of poverty: lone parents, families with a disabled adult or child, young mothers, minority ethnic families, families with a child under 1, and larger families (with three or more children).

The Joseph Rowntree Foundation report Poverty in Scotland (2021) noted that 54% of people who are in families where no one is working are in poverty and full-time work plays an important role in reducing the risk of poverty in Scotland.

However, it is estimated that 24% of children (240,000 children each year) were living in relative poverty after housing costs in 2017-20. Before housing costs, it is estimated that 21% of children (210,000 children each year) were in relative poverty.

After a long fall between the late nineties and 2010-13, which slowed briefly just before the recession, child poverty rates have been gradually rising again.

Considering the drivers of child poverty, three key areas are identified: income from employment, costs of living and income from social security and benefits in kind. Planning has a particular role to play in the provision of:

Good quality work

Housing (including energy and food) costs are minimised

Accessible childcare

Accessible and affordable public transport

Access to the internet.

## Health and Wellbeing

In 2019, the proportion of children (aged 2–15) who met the recommended physical activity level over the last seven days, was the lowest in the time series.

71% in 2008

76% in 2016

69% in 2019

A review of key literature by Public Health Scotland (2021) found that the benefits of high quality greenspace on physical and mental health appear to be most significant for certain groups within the population, including children.

The Scottish Government has identified very young children as a socially vulnerable group, being sensitive to climate impacts. Babies and young children face disproportionately high health effects as a result of climate change impacts. Extreme events can be traumatic and potentially lead to developmental impacts.

Increasing active travel can subsequently increase the level of physical activity in both children and adults. It also noted that it could mean less use of the car, which would reduce air and noise pollution and the number of incidents and accidents involving cars. Vulnerable people in the population such as children can be the most affected by poorer air quality.

We consider that of the eight wellbeing indicators (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included (known by the acronym SHANARRI)), policy in Draft NPF4 specifically relates to:

**Safe:** places designed for lifelong health and wellbeing: supporting safety and supporting safe, pleasant and welcoming natural and built spaces.

**Healthy:** Having support in learning to make healthy and safe choices.

**Achieving:** supporting an infrastructure first approach (including for education provision), informed by evidence on infrastructure capacity, condition, needs and deliverability.



Active: Having opportunities to take part in activities such as play, recreation and sport, which contribute to healthy growth and development.

Respected: Given a voice and involved in the decisions that affect their wellbeing.

Responsible: Taking an active role in their schools and community.

Included: Having help to overcome social, educational, physical and economic inequalities and being accepted as part of the community in which they live and learn.

Specific policy interventions include:

Updated policy on design, quality and place, requiring plans and proposals to reflect the six qualities of successful places.

Planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality. It contains a revised policy that parties have a responsibility to consult and engage others collaboratively, meaningfully and proportionately.

Updated policy on blue and green infrastructure, play and sport requiring assets to be safeguarded and seeking opportunities for enhancement. New policies also protect children's outdoor play provision and design-in new opportunities for play in the built environment.

A new policy on lifelong health and wellbeing which aims to create healthier places.

Articles of the UNCRC which may be particularly relevant include:

**Article 12** – where every child has a right to express their views and have them given due weight in accordance with their age and maturity. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body.

Draft NPF4 supports collaborative engagement which ensures that meaningful and proportionate steps are taken to engage. Provisions in the Planning (Scotland) Act 2019 provide a statutory framework for engaging with children and young people to the age of 25.

**Article 24** – Health and health services. Governments must provide good quality health care, clean water, nutritious food and a clean environment so that children can stay healthy.

Improving the health and wellbeing of the people of Scotland is one of the six high level outcomes for NPF4.

The spatial strategy recognises that our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. This will help us to be healthy and active, creative and diverse, so that people grow up loved, safe and respected, and realise their full potential.

Places are important for physical and mental health and overall wellbeing. The places where children and young people grow up shape the opportunities that they have and influence the course of their lives. The planning system should support development that reduces health inequalities and creates an environment that promotes active and healthier lifestyles.

**Article 27 (1-3)** – an adequate standard of living, with specific reference to assistance and support with food, clothing and housing.

Draft NPF4 recognises the important role that planning can play in tackling some of the drivers of child poverty, including:

Access to good quality work

Housing (including energy and food) costs are minimised

Accessible childcare

Accessible and affordable public transport

Access to the internet.

**Article 31** – a right to play, rest, leisure and access cultural life appropriate to their age.

Draft NPF4 recognises that opportunities for play can make a significant contribution towards creating more liveable and healthier places.

Outdoor spaces for play, sport and recreation can make a significant contribution towards creating more liveable and healthier places.

	<p>Children experience a range of health, wellbeing and educational benefits from outdoor play, and learning in, and connecting with, nature. Providing quality opportunities for children of all ages to play will benefit their physical and cognitive development, and uphold their right to engage in play and recreational activities.</p> <p>The planning system should support development that expands opportunities for play in the public realm and in a range of different types of open and green spaces, and which addresses unequal access to play spaces and facilities.</p> <p>We recognise that the data available does not allow a complete picture of the experiences and views of children and young people. However the CRWIA has provided the opportunity to consider the potential impact of the policies contained in Draft NPF4 on them.</p> <p>The Scottish Government has found that the proposals do not impinge negatively upon articles of the UNCRC or the indicators of wellbeing (SHANARRI) and that we do not consider that there are issues that will impact negatively upon children and young people.</p>
<b>Monitoring and review</b>	<p>The Draft NPF4 will be subject to public consultation and scrutiny by the Scottish Parliament. In light of those consultations and any comments/additional information received, we will we revisit this assessment and publish the final assessment alongside the adopted NPF4.</p>
<b>CRWIA Declaration</b>	
<b>Authorisation</b>	
<p><b>Policy lead</b></p> <p>Name: Graham Robinson  Title: Policy Manager  Planning and Architecture Division</p>	<p><b>Date</b></p>
<p><b>Deputy Director or equivalent</b></p> <p>Name: Dr Fiona Simpson  Title: Chief Planner  Planning and Architecture Division</p>	<p><b>Date</b></p>

## Appendix C. Fairer Scotland Duty

<b>Title of Policy</b>	Draft National Planning Framework 4
<b>Summary of aims and expected outcomes of strategy, proposal, programme or policy</b>	<p>The adopted NPF4 will guide the development and use of land across all Scotland out to 2045. It will form part of the development plan and therefore influence more the day to day decisions on local planning matters. It will focus on our future:</p> <ul style="list-style-type: none"> <li>• Sustainable places</li> <li>• Liveable places</li> <li>• Productive places</li> <li>• Distinctive places</li> </ul> <p>In terms of policy, NPF4 is linked to the outcomes of the National Performance Framework<sup>1</sup>. It will look to rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions. A place based approach is at the heart of creating a more sustainable and fair Scotland. The planning system should apply the Place Principle which commits us to take a collaborative place based approach to future development. This must involve working with stakeholders and local communities to create liveable, healthier and sustainable places that improve lives, build economic prosperity and contribute to net zero and environmental ambitions.</p> <p>NPF4 will look to deliver on six high level outcomes which include:</p>

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<sup>1</sup> [National Performance Framework | National Performance Framework](#)

	<ul style="list-style-type: none"> <li>• meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people;</li> <li>• improving the health and wellbeing of people living in Scotland;</li> <li>• improving equality and eliminating discrimination; and</li> <li>• increasing the population of rural areas of Scotland.</li> </ul> <p>It will also include land use planning policies on key issues supporting people’s lives such as; tackling inequalities, engagement, local living, housing, spaces and places, work and inequalities, health and wellbeing and connectivity. It therefore has the potential to impact development and land use across all Scotland.</p>
<p><b>Summary of evidence</b></p>	<p>This Fairer Scotland Duty assessment has been developed drawing on a range of primary and other source documents, including a Call for Ideas plus a public consultation on a Position Statement. We have also considered sources contained in the Scottish Government’s equality evidence finder.</p> <p>To identify any potential improvements, we are undertaking a full consultation on Draft NPF4. At the same time we are also consulting on an Integrated Impact Assessment (covering other societal and environmental matters) and a Business and Regulatory Impact Assessment covering Draft NPF4. The adopted NPF4, incorporating the consultation feedback will be published in 2022.</p> <p>With links to both the purpose of planning and a high level outcome of improving equality and eliminating discrimination, NPF4 provides an outcome focussed opportunity to tackle inequalities.</p> <p>NPF4 explains how our spatial strategy will contribute to improving equality and eliminating discrimination. People living in the most deprived areas and neighbourhoods are more exposed to environmental conditions and other factors that negatively affect health and access to opportunities – including those relating to transport, access to green space, pollution effects, housing quality, fuel poverty, community participation, and social isolation.</p>

### **Spatial element of inequalities**

Evidence suggests that to tackle inequalities it is necessary to take both a spatial and thematic approach based on communities of geography and identity.

When considering tackling poverty, Building the evidence base on tackling poverty<sup>2</sup> (2017) set out ‘pockets’, ‘prospects’ and ‘places’ as three drivers. “Places” includes: the regions and neighbourhoods people live in - impact of pollution on health, access to green space. Ability to access services and employment. Local labour market. Social networks. Regional variations in costs.

The main tool for identifying the places in Scotland where people are experiencing disadvantage across different aspects of their lives is the Scottish Index of Multiple Deprivation (SIMD). Its most recent iteration was published in 2020 and includes an interactive map<sup>3</sup>.

It can also allow effective targeting of policies and funding where the aim is to wholly or partly tackle or take account of area concentrations of multiple deprivation.

Research also identified areas of Scotland that are expected to be most vulnerable to the consequences of EU Exit. An accompanying interactive map<sup>4</sup> allows for more granular analysis of each datazone in Scotland.

Key findings were that:

The risks presented by EU Exit are anticipated to have significant social and economic consequences for all areas of Scotland.

Many of the areas most vulnerable to EU Exit are in rural locations, in particular on the Scottish islands.

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<sup>2</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2020/03/drivers-of-poverty/documents/drivers-of-poverty/drivers-of-poverty/govscot%3Adocument/00520728.pdf>

<sup>3</sup> [SIMD \(Scottish Index of Multiple Deprivation\)](#)

<sup>4</sup> <https://scotgov.maps.arcgis.com/apps/opdashboard/index.html#/35590be803944353a244cccd0d8f78e0>

	<p>In assessing the candidate National Developments, both SIMD and EU Exit vulnerability data were considered where relevant.</p> <p><b>Differential impact of poverty and protected characteristics</b></p> <p>Poverty and Income Inequality in Scotland 2017-20<sup>5</sup> (2021) estimated that 19% of Scotland’s population (1.03 million people each year) were living in relative poverty after housing costs in 2017-20. Before housing costs, 17% of the population (910,000 people) were living in poverty. Relative poverty is a measure of whether the lowest-income households are keeping pace with middle income households across the UK.</p> <p>After a long decline since the beginning of the time series in the mid-nineties, absolute poverty rates have stagnated in the last decade.</p> <p>Before housing costs, 14% of the population (770,000 people each year) were in absolute poverty. The trend is similar to the after housing costs measure, although the downward trend started to stagnate a few years later.</p> <p>Households on low incomes are more likely to experience fuel poverty than those on higher incomes. Scottish House Condition Survey data (2020) indicates that around 613,000 (24.6%) households were classified as living in fuel poverty in 2019, with around 311,000 (12.4%) living in extreme fuel poverty.</p> <p>It also noted that approximately half (48%) of fuel poor households are other households (without children or older members). Around 16% of households living in fuel poverty are families with children, and 36% are older households.</p>
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<sup>5</sup> [Poverty and Income Inequality in Scotland 2017-20 \(data.gov.scot\)](https://data.gov.scot)

### **Age and poverty**

The equality analysis of poverty showed that in the last 15 years, the youngest adults (16-24 year olds) have been consistently more likely to be in relative poverty compared to older adults.

Child poverty figures suggest that some types of households with children are known to be at a particularly high risk of poverty. These include households with single parents, three or more children, disabled household members, of a minority ethnic background, those with a child aged under one, or with a mother aged under 25. These groups do not cover everyone at higher risk of poverty, but taken together, they cover the majority of households with children that are in poverty.

It is estimated that 24% of children (240,000 children each year) were living in relative poverty after housing costs in 2017-20. Before housing costs, it is estimated that 21% of children (210,000 children each year) were in relative poverty.

### **Gender and poverty**

In 2017-20, the relative poverty rate after housing costs for all single adults (working-age and pensioners) was 27%, higher than for the total population (19%).

The poverty rate was highest for single women with children (38%, 40,000 single mothers each year).

The National Transport Strategy 2: Fairer Scotland duty assessment<sup>6</sup> (2020) noted that women in Scotland are much more likely than men to be part-time workers (44% compared to 15%) with over 75% of Scotland's part-time workforce being female. Women are also more likely to be in low-paid work, with 64% of people paid below the Living Wage being female. In particular, lone parents, the vast majority of whom are women, are more likely to be living

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<sup>6</sup> <https://www.transport.gov.scot/media/47042/national-transport-strategy-2-fairer-scotland-duty-assessment.pdf>



in poverty than other single working-age adults in Scotland.

### **Marital status and poverty**

Relative poverty rates are highest for singles, divorced & separated, and lowest for married adults.

Poverty among widowed and divorced/separated adults largely decreased over the long term, whereas the trend for singles, cohabiting and married adults was broadly flat over time.

### **Ethnicity and poverty**

In 2015-20, people from non-white minority ethnic groups were more likely to be in relative poverty after housing costs compared to those from the 'White - British' and 'White - Other' groups.

The poverty rate was 41% for the 'Asian or Asian British' ethnic groups (50,000 people each year), and 43% for 'Mixed, Black or Black British and Other' ethnic groups (no population estimate available due to the small sample).

The poverty rate amongst the 'White - Other' group was 24% (80,000 people) and that of the 'White - British' group was 18% (860,000 people).

### **Religion and poverty**

In 2015-20, Muslim adults were more likely to be in relative poverty (52%, 30,000 each year) than adults overall (18%), after housing costs were taken into account.

### **Disability and poverty**

Poverty rates remain higher for households in which somebody is disabled compared to those where no-one is disabled. In 2017-20, the poverty rate after housing costs for people in households with a disabled person was 23% (500,000 people each year). This compares with 17% (540,000 people) in a household without disabled household members.

### **Participation**

Evidence suggests that people are keen to be involved in shaping the places that they stay and to be involved in

	<p>local decision-making. However, in 2019<sup>7</sup>, 17.8% of people agreed that they can influence decisions affecting their local area, down from 20.1% in 2018. This is a decrease of 2.3 percentage points since last year, and is the lowest level since first measured in 2007.</p> <p>Perceptions<sup>8</sup> of ability to influence decisions and the desire to be involved in decision-making were lower in the most deprived areas compared to the least deprived areas.</p> <p>Over three-quarters (78 per cent) of adults felt a very or fairly strong sense of belonging to their neighbourhood in 2019<sup>9</sup>. This sense of belonging was lower for people living in deprived areas.</p> <p><b>Housing and accommodation</b></p> <p>Living in poverty, or on a low income and with little or no wealth, restricts housing choices, presents affordability challenges and increases the likelihood of experiencing fuel poverty and the risks of homelessness.</p> <p>From the Housing to 2040 Fairer Scotland Duty assessment<sup>10</sup> we know that:</p> <ul style="list-style-type: none"> <li>• Affordable housing helps to tackle poverty and inequality. Increasing the supply of affordable and social rented homes and tackling unreasonably high rents in the private rented sector will continue to make an impact on child poverty levels.</li> <li>• Safe and warm homes and good neighbourhoods improve physical and mental health and wellbeing and build strong communities. Making sure homes add to and create great places will help to improve social cohesion, enable and contribute to</li> </ul>
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<sup>7</sup> [National Indicator Performance | National Performance Framework](#)

<sup>8</sup> [Scottish household survey 2018: annual report - gov.scot \(nrscotland.gov.uk\)](#)

<sup>9</sup> [Scottish household survey 2019: annual report - gov.scot \(www.gov.scot\)](#)

<sup>10</sup> [Housing to 2040: Fairer Scotland Duty - gov.scot \(www.gov.scot\)](#)

	<p>community wealth building and unlock social capital across Scotland.</p> <ul style="list-style-type: none"> <li>• Housing creates and supports jobs and drives inclusive economic growth and social benefits. Housing’s unique place at the heart of thriving communities means that investment in housing, and all the indirect effects that flow from that, can contribute to community wealth and social renewal.</li> </ul> <p>The draft fuel poverty strategy<sup>11</sup> sets out an approach which considers the wider issues of social justice and the health impact of tackling fuel poverty. It has two main objectives:</p> <ul style="list-style-type: none"> <li>• Removing poor energy efficiency as a driver for fuel poverty.</li> <li>• Reducing greenhouse gas emissions through more energy efficient buildings and decarbonising our heat supply.</li> </ul> <p>Local authority estimates, published in December 2020, showed that island and rural local authorities tended to have both higher fuel poverty rates and extreme fuel poverty rates<sup>12</sup>.</p> <p><b>Spaces and places</b></p> <p>Planning has a crucial role to play in reducing inequalities by ensuring everyone lives in good quality places that support quality of life. The Place Standard<sup>13</sup> is an effective tool for helping us all to understand the strengths and weaknesses of our places and reducing inequalities by helping to ensure everyone lives in good quality places that support quality of life.</p> <p>Deprivation<sup>7</sup> reveals area-based differences, as the proportion rating their neighbourhood as a very good</p>
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<sup>11</sup> [Draft Fuel Poverty Strategy for Scotland 2018 - gov.scot \(www.gov.scot\)](http://www.gov.scot)

<sup>12</sup> [Scottish House Condition Survey: Local Authority Analysis 2017-2019 - gov.scot \(www.gov.scot\)](http://www.gov.scot)

<sup>13</sup> [Place Standard](#)

	<p>place to live increased significantly as deprivation declined. Of those living in the 20% most deprived areas of Scotland in 2019, 32% rated their neighbourhood as a very good place to live, rising to 77% for those living in the 20% least deprived areas. This is a similar trend to previous years.</p> <p>People<sup>7</sup> in the 15% most deprived areas were less likely to think the local crime rate had stayed the same or reduced in the past two years than those living elsewhere in Scotland (65% compared to 74%).</p> <p>In relation to access to greenspace at home Public Health Scotland recent analysis was quoted as showing that there is quite a differentiation between space (private outdoor space at home e.g. gardens or balconies) depending on the tenure. Hansard reported that only 3% of homeowners do not have access to open space in the house, whereas for private sector tenants it is 23% and for local authority tenants it is 19%.<sup>14</sup></p> <p>People living in the most deprived areas are less likely to live within a 5 minute walk of their nearest greenspace than people in less deprived areas. This observation has been consistent over the time series the data has been collected.</p> <p>Respondents living in the 15% most deprived areas of Scotland were more likely to agree or agree strongly that the quality of their local greenspace has reduced in the past 5 years (50% strongly agree/agree, compared to 40% of urban Scots) or if just use 'strongly agree' 26% compared to 18%.<sup>15</sup></p> <p>Research found that the quality of play areas was poorer in more deprived neighbourhoods, as compared to those in the least deprived areas. The 2016 Scottish Household Survey<sup>16</sup> showed that most children had access to play areas in their neighbourhood, but that availability differed according to levels of deprivation within urban areas. Households within the 20% of most deprived urban areas</p>
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<sup>14</sup> [Public Health Scotland, data quoted at House of Lords, Covid-19 Committee](#)

<sup>15</sup> [Greenspace Use and Attitudes Survey 2017 greenspace scotland \(2017\)](#)

	<p>said they had less access to a natural environment or wooded area in their neighbourhood, compared to the rest of urban areas. Parents living in the 20% most deprived urban areas were also much less likely to think that it was safe for children to travel alone to most play areas.<sup>16</sup></p> <p>Research published by Public Health Scotland finds that ‘Socio-economic inequalities in use of green and open spaces existed before lockdown. Lockdown did not reduce these and may have made them worse.’ It also notes that users reported that green and open space benefited their mental health during lockdown. Individuals of higher social grade were more likely to report increases in use, and also greater benefits to their mental health.<sup>17</sup></p> <p>The Scottish Vacant and Derelict Land Survey 2019<sup>18</sup> (2020) found that 55% of people living in the most deprived decile in Scotland are estimated to live within 500 metres of derelict land, compared to 11% of people in the least deprived decile.</p> <p>The Scottish Household Survey Key Findings 2019<sup>19</sup> (2020) found that adults living in the 20 percent most deprived areas were more likely not to have not made any visits to the outdoors in the past 12 months (19 percent) compared to those in the 20 percent least deprived areas (four percent).</p> <p>Although level of deprivation did not impact social isolation, as measured by the number of people meeting socially at least once a week, those living in the most deprived areas were almost twice as likely to experience feelings of loneliness as those living in the least deprived areas.</p>
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<sup>16</sup> At the start of 2009, a series of questions on the opportunities for children to play in their neighbourhood were added to the Scottish Household Survey. From 2012, the set of questions were only asked if there was a child aged 6 to 12 years in the household. Data from this set of questions were collected every two years and were last presented in the Scottish household survey 2016: Annual report. Scottish Government (2017). Scottish household survey 2016: Annual report. <http://bit.ly/319Olyi>

<sup>17</sup> [University of Glasgow - Research Institutes - Institute of Health & Wellbeing - News - Change in use of green and open space during lockdown](#)

<sup>18</sup> [Scottish Vacant and Derelict Land Survey 2019 - gov.scot \(www.gov.scot\)](#)

<sup>19</sup> [Scottish household survey 2019: key findings - gov.scot \(www.gov.scot\)](#)

	<p><b>Connectivity</b></p> <p>Digital Connectivity</p> <p>Adults in the most deprived areas and those with lower household income are less likely to use the internet or to have home internet access<sup>20</sup>. In the 20% most deprived areas in Scotland, 82% of households had access to the internet, compared to 96% in the 20% least deprived areas.</p> <p>21% of adults in social housing did not use the internet (compared to only 5% in Private Rented Sector and 10% of owner occupiers)<sup>8</sup>. Being older or disabled, living in a deprived area or living in social housing were risk factors for exclusion from access to digital services<sup>21</sup>.</p> <p>Transport Connectivity</p> <p>The Fairer Scotland Duty assessment accompanying the National Transport Strategy 2<sup>22</sup> noted the following key information.</p> <ul style="list-style-type: none"> <li>• Research undertaken by Sustrans from 2016 stated that over one million Scots live in areas that are at risk of transport poverty, defined as those who don't have access to essential services or work due to limited affordable transport options.</li> <li>• Research published by the Joseph Rowntree Foundation found that poor service coverage, reliability, and or affordability of public transport discourage people in low income to commute to employment sites, reinforcing socio-economic disparities. This is compounded by the fact that poor service coverage is more likely in deprived communities.</li> </ul>
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<sup>20</sup> [Covid+and+Inequalities+Final+Report+For+Publication+--+PDF.pdf \(www.gov.scot\)](https://www.gov.scot/publications/covid-and-inequalities-final-report-for-publication-2020-12-23/pages/100-to-109.pdf)

<sup>21</sup> [EHRC Is Scotland fairer? Summary Report \(equalityhumanrights.com\)](https://equalityhumanrights.com/wp-content/uploads/2020/07/EHRC-Is-Scotland-fairer-Summary-Report.pdf)

<sup>22</sup> [National Transport Strategy - Fairer Scotland Duty: Assessment](#)

	<p>There are links between poverty and ability to cycle. Household access to bikes increases with household income. 62% of households with an income of £50,000 or more have access to one or more bikes, compared to 20% of households with an income up to £10,000.</p> <p>Bicycle access is higher in rural areas than urban areas. There are also links between household income and people walking just for pleasure or to keep fit. For those living in households with annual income up to £10,000, 58% walk one or more days per week. For those in households with more than £50,000 annual income the figure rises to 71%.</p> <p>Transport and Travel in Scotland 2019<sup>23</sup> (2020) noted that 68% of people travelled to work by car or van, 12% by walking and 10% by bus. However, this varied with income. Those in households with incomes under £15,000 were more likely to take the bus or walk than those on higher incomes. People from households with incomes over £50,000 were the most frequent car users.</p> <p><b>Health and wellbeing</b></p> <p>Both mental and physical health are notably poorer in more deprived areas. In the most deprived areas in Scotland, 33% of adults lived with a limiting condition, while 15% of adults lived with a limiting condition in the least deprived areas<sup>24</sup>. People living in the most deprived areas are also more likely to be in poor health and to have many long-term conditions.</p> <p>Long-term monitoring of health inequalities: January 2021 report<sup>25</sup> noted that both males and females in the most deprived areas in Scotland are estimated to spend a lower proportion of their life in good health than those living in the least deprived areas.</p> <p>For adults, 26% of adults in the most deprived areas were at a healthy weight, compared to 38% of those in the least</p>
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<sup>23</sup> [Transport and Travel in Scotland 2019: Results from the Scottish Household Survey](#)

<sup>24</sup> [Scotland's People Annual Report: Key findings - 2019 \(www.gov.scot\)](#)

<sup>25</sup> [Long-term monitoring of health inequalities: January 2021 report - gov.scot \(www.gov.scot\)](#)

	<p>deprived areas. For children, the trend was similar, with 62% of children in the most deprived areas at a healthy weight, compared to 76% of children living in the least deprived areas.</p> <p>74% of adults in the least deprived areas met physical activity recommendations, compared with 54% of adults in the most deprived areas.</p> <p>In 2019/2020, 84% of the population lived in households with high food security. This means that 16% of people lived in households with marginal, low or very low food security. People in poverty were less likely to experience high food security: just 60% of those in relative poverty, and 59% of those in absolute poverty lived in high food security households.</p> <p>Food insecurity has consistently been more prevalent among adults living in low income households. In 2019, 23% of adults with household incomes in the bottom quintile (less than £14,444/year) reported experiencing food insecurity compared to 3% of adults with household incomes in the top quintile (more than £49,400/year). Prevalence of food insecurity has consistently been higher among adults living in the most deprived areas compared to those living in the least deprived areas.</p>
<p><b>Summary of assessment findings</b></p>	<p>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.</p> <p>For people on low incomes – this is a strong determinant for people’s ability to respond to and recover from climate change impacts.</p> <p>Our future places and spaces need to contribute to improving equality and eliminating discrimination by addressing the environmental conditions and other factors that negatively affect health and access to employment opportunities – plus those relating to connectivity – both digital and transport, access to green space, pollution effects, housing quality, fuel poverty and community participation.</p> <p>The planning system should support decisions that improve equality and help to eliminate discrimination, with a fairer, more inclusive and equalities based approach to planning the future. Draft NPF4 contains an overarching</p>



	<p>policy such that planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality.</p> <p>NPF4 has the potential to impact upon people across the whole of Scotland irrespective of the socio-economic status.</p> <p>We have identified a number of key policies to tackle inequalities in this broadest sense. These policies are set out in the NPF4 spatial strategy and thematic policies and are reflected in the proposed national developments.</p> <p>In addition to the policies contained within Draft NPF4, the Scottish Government is preparing associated guidance for planning authorities on local development planning.</p> <p><b>Access to employment opportunities</b></p> <p>Recognising the three drivers of poverty; ‘pockets’, ‘prospects’ and ‘places’, the NPF4 spatial strategy recognises that our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing.</p> <p>This will help Scotland to have a globally competitive, entrepreneurial, inclusive and sustainable economy, with thriving and innovative businesses, quality jobs and fair work for everyone.</p> <p>A new National Strategy for Economic Transformation will set out how we can work together to recover from the pandemic and build a sustainable economy in the longer term. By helping to deliver this, planning will contribute to our short term recovery, as well as our long term just transition to a net zero, nature-positive economy.</p> <p>We want to encourage development that supports the prosperity of key sectors, builds community wealth and creates fair work and good green jobs where they are most needed. This will support people’s aspirations for good quality jobs and help reduce child poverty.</p> <p>The Scottish Government wants to see local development plans set out proposals to meet requirements for employment land, infrastructure and investment in a way which supports a greener, fairer and more inclusive wellbeing economy.</p>
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	<p>The total investment to decarbonise Scotland’s (domestic and non-domestic) buildings is estimated to be in the region of £33 billion over the period to 2045, and is likely to support around 24,000 jobs each year as investment reaches its peak in the late 2020s<sup>26</sup>.</p> <p><b>Participation</b></p> <p>We hope to empower more people to shape their places.</p> <p>NPF4 sets out that the Government is aspiring to inspire people to pro-actively decide how their places should develop in the future and have influence in the decisions that impact on their lives. Policies will meet the Government’s place aspirations by ensuring that plans and decisions are properly informed by the views of local people through a more collaborative approach to engagement.</p> <p><b>Housing and accommodation</b></p> <p>Good quality homes should be at the heart of great places and contribute to strengthening the health and wellbeing of Scotland’s communities. To help tackle climate change, we will need more energy efficient, net zero emissions homes. This can also support a greener, fairer and more inclusive wellbeing economy and has the potential to help build community wealth and reduce fuel poverty.</p> <p>Scottish Ministers consider that development of land supported by the policies and proposals in the NPF will deliver high quality, sustainable homes that meet the needs of people throughout their lives. Proposals for new homes that improve affordability and choice will be supported and that an equalities led approach to addressing identified gaps in provision should be taken.</p> <p>Draft NPF4 recognises that heat networks can help contribute to Scotland’s net zero ambitions by using and storing heat from low or zero emissions sources, such as surplus or waste heat, heat from large scale heat pumps,</p>
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<sup>26</sup> [Heat in Buildings Strategy: Achieving Net Zero Emissions in Scotland's Buildings Consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/Heat-in-Buildings-Strategy-Achieving-Net-Zero-Emissions-in-Scotland-s-Buildings-Consultation)

	<p>particularly in conjunction with geothermal systems or bodies of water or clean hydrogen to provide zero emissions heat to homes. There is scope for this to reduce fuel poverty.</p> <p><b>Space and places</b></p> <p>The Social Capital in Scotland: Report<sup>27</sup> (2020) suggests that we need to ensure there are good quality, affordable and accessible places and spaces where people spend time, gather and meet. It noted it is essential to create, retain and maintain the environmental and social infrastructure that supports social interactions and participation in communities – the informal public places, spaces, and facilities where people spend time, gather and meet. Evidence shows this is most important in the areas where there is a perceived lack of these places, e.g. in areas of deprivation.</p> <p>On a range of indicators people who live in deprived areas are faring worse than those in less deprived areas, these include: a sense of belonging to their community or rating their neighbourhood as a good place; perceptions around the local crime rate; less likely to have access to greenspace; made visits to the outdoors; or living within 500 metres of vacant and derelict land and properties.</p> <p>Place is where people, locations and resources combine to create a sense of identity and purpose, and it is at the heart of addressing the needs and realising the full potential of communities. The planning system should apply the Place Principle and ensure that a design-led approach is taken for future development which involves working with stakeholders and local communities to create liveable, sustainable places that improve the lives of people, support greater equity, and inclusive and sustainable economic growth and contribute to net-zero ambitions.</p> <p>The planning system should support development that will contribute to the creation of walkable, liveable and thriving</p>
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<sup>27</sup> <https://www.gov.scot/publications/social-capital-scotland-measuring-understanding-scotlands-social-connections/pages/8/>

	<p>places that provide communities with local access to the wide range of local facilities and services that they need, including access to employment opportunities, health and care facilities and services, shopping, safe streets and places, childcare and education, affordable housing plus green networks, outdoor spaces for play, community gardens, culture, sport and recreation facilities.</p> <p><b>Connectivity</b></p> <p>Digital connectivity</p> <p>The Scottish Government wants to ensure that no areas are left behind by closing the digital divide. The planning system should continue to support the roll-out of digital infrastructure across all of Scotland, ensuring that policies recognise the importance of future-proofing infrastructure provision whilst addressing impacts on local communities and the environment.</p> <p>Policies in local development plans should support the delivery of digital infrastructure, particularly in areas with gaps in connectivity and barriers to digital access. Development proposals that deliver new digital services or provide technological improvements, particularly in areas with no or low connectivity capacity, should be supported.</p> <p>Transport connectivity</p> <p>Scotland’s transport system should contribute to the creation of great places through prioritising the need to reduce inequalities; take climate action; help deliver inclusive economic growth; and improve health and wellbeing. The planning system will support development that minimises the need for travel and encourage active travel.</p> <p><b>Health and Wellbeing</b></p> <p>Improving the health and wellbeing of the people of Scotland is one of the six high level outcomes for NPF4.</p> <p>The spatial strategy recognises that our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. This will help us to be healthy and active, creative and diverse, so that people grow up loved, safe and respected, and realise their full potential.</p> <p>Places are important for physical and mental health and overall wellbeing. The places where children and young people grow up shape the opportunities that they have</p>
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	<p>and influence the course of their life. The planning system should support development that reduces health inequalities and creates an environment that promotes active and healthier lifestyles.</p> <p>The reuse of vacant and derelict land and properties can contribute to climate change targets and support biodiversity, health and wellbeing improvements and resilient communities by providing much needed greenspace, growing spaces and other community benefits. The planning system should also prioritise the use of vacant and derelict land and properties including supporting temporary uses where proposals for permanent development are unlikely to be imminent. Reductions in the amount of vacant and derelict land can assist in the mitigation of its harmful effects on people’s health and wellbeing.</p> <p>Local development plans should aim to create vibrant, healthier and safe places and should seek to tackle health inequalities particularly in places which are experiencing the most disadvantage. Development proposals for, or including, space or facilities for local community food growing and allotments should be supported.</p> <p>In addition to the policies contained within Draft NPF4, the Scottish Government is preparing associated guidance for planning authorities on local development planning. This is subject to consultation and covers areas highlighted in this assessment.</p> <p><b>National Developments</b></p> <p>National developments are those that strongly support the delivery of the spatial strategy, i.e. are ‘needed’. Their identification is helpful to those delivering and hosting them including; public, commercial, and third sector bodies; and communities.</p> <p>The national developments proposed in the draft NPF4 are aligned to wider Scottish Government policy as far as is reasonable to do so at this time, to strengthen the connection between the NPF4 spatial strategy and delivery.</p> <p>Over 250 national development suggestions were received and were considered against four criteria.</p>
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	<p>Climate change: The development will help to reduce emissions, will be emissions neutral, or emissions negative, contributing to Scotland’s target of net zero emissions by 2045.</p> <p>People: The development will support the health, wellbeing, sustainability, and quality of life of our current and future population.</p> <p>Inclusive Growth: The development will contribute to sustainable economic growth that helps to reduce poverty and inequality across Scotland.</p> <p>Place: The development will protect or enhance the quality of a place or improve biodiversity.</p> <p>In assessing the candidate National Developments, both SIMD and EU exit vulnerability data were considered where relevant,</p> <p>The Draft NPF4 includes 18 proposed national developments;</p> <ul style="list-style-type: none"> <li>• Central Scotland Green Network</li> <li>• National Walking, Cycling and Wheeling Network</li> <li>• Urban Mass/Rapid Transport Networks</li> <li>• Urban Sustainable, Blue and Green Drainage Solutions</li> <li>• Circular Economy Materials Management Facilities</li> <li>• Digital Fibre Network</li> <li>• Islands Hub for Net Zero</li> <li>• Industrial Green Transition Zones</li> <li>• Pumped Hydro Storage</li> <li>• Hunterston Strategic Asset</li> <li>• Chapelcross Power Station Redevelopment</li> <li>• Strategic Renewable Electricity Generation and Transmission Infrastructure</li> </ul>
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	<ul style="list-style-type: none"> <li>• High Speed Rail</li> <li>• Clyde Mission</li> <li>• Aberdeen Harbour</li> <li>• Dundee Waterfront</li> <li>• Edinburgh Waterfront</li> <li>• Stranraer Gateway</li> </ul> <p>Draft NPF4 is subject to scrutiny in the Scottish Parliament and currently out for public consultation. We will finalise the assessment in response to comments received and publish a revised assessment with the adopted NPF4.</p>
<b>Sign off</b>	<p><b>Name: Dr Fiona Simpson</b></p> <p><b>Job title: Chief Planner</b></p>

# Appendix D. Island Communities Impact Assessment

## Draft National Planning Framework 4

### D.1. Background

This Island Communities Impact Assessment (ICIA) relates to the development of Draft National Planning Framework 4 (NPF4).

The adopted NPF4 will guide the development and use of land out to 2045. It will form part of the development plan and therefore influence more the day to day decisions on local planning matters. It will focus on our future:

- Sustainable places
- Liveable places
- Productive places
- Distinctive places

In terms of policy, NPF4 is linked to the outcomes of the National Performance Framework. It will look to 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 Government's aim is also to help stimulate the green economy by facilitating innovation, greener design and place-based solutions.

NPF4 will look to deliver on six high level outcomes which include:

- meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people;
- increasing the population of rural areas of Scotland,
- improving the health and wellbeing of people living in Scotland; and
- improving equality and eliminating discrimination.

It will also include land use planning policies supporting key issues supporting island communities lives such as engagement, local living, housing, spaces and places, rural and coastal policies, health and wellbeing and connectivity.



## **The Islands (Scotland) Act 2018 (the 2018 Act)**

The Islands (Scotland) Act 2018 provides for a duty on the Scottish Ministers and other relevant public bodies that they must have regard to island communities in exercising their functions and in the development of legislation.

The 2018 Act lists the following areas that are relevant considerations for islands and islands communities:

- Depopulation
- Economic development
- Environmental protection
- Health and wellbeing
- Community empowerment
- Transport
- Digital connectivity
- Fuel poverty
- Land management
- Biodiversity

The planning system has a role to play in the development and use of land in the long term public interest, including the future development of communities, and so has a relevance to each of the considerations listed above.

### **D.2. Implications of Policy Changes for Island Communities**

Desk top analysis was undertaken of the evidence gathered for the development of the Planning Bill, including the equality impact assessment<sup>1</sup> and ICIA<sup>2</sup>, plus the integrated impact assessment accompanying the early engagement<sup>3</sup> on National Planning Framework 4. Additional information was drawn from Rural Planning Policy

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<sup>1</sup> <https://www.gov.scot/publications/planning-bill---post-stage-2-equality-impact-assessment/>

<sup>2</sup> <https://www.gov.scot/publications/planning-bill---post-stage-2-island-communities-impact-assessment/>

<sup>3</sup> [How we got here | Transforming Planning](#)

to 2050: Research to Inform Preparation of NPF4<sup>4</sup>, the screening ICIA<sup>5</sup> on changes to Pre-Application Consultation requirements (matters pertaining to participation in planning plus digital connectivity) and Young People and the Highlands and Islands (2018)<sup>6</sup>. Data was also taken from The National Islands Plan Survey Final Report (2021)<sup>7</sup> and recent ICIA's for Housing for 2040 and the National Transport Strategy.

Key data from the analysis is included under the following 12 headings.

## Population and demographics

Population demographics: NRS Scotland, Scotland's population has increased for most of the last 200 years and now stands at 5.47 million. Scotland's population is projected<sup>8</sup> to continue increasing, but at a slower rate than in recent years. In the ten years to mid-2028, the population is projected to increase by 1.8% to 5.54 million and in the 25 years to mid-2043, it is projected to increase by 2.5% to 5.57 million.

NRS Scotland Mid-Year Population Estimates Scotland, Mid-2019 (2020)<sup>9</sup> indicate that Na h-Eileanan Siar and the Orkney Islands are among the local authority areas with an older population in Scotland, with Shetland closer to the overall figures for Scotland.

The level of population change varies across Scotland's council areas, over the latest year to mid-2019, 8 council areas experienced a falling population, mostly island and rural areas, as well as areas in the west of Scotland. Those which experienced greatest population decline (in percentage terms) were:

- Argyll and Bute (-390 people, -0.5%)
- Na h-Eileanan Siar (-110 people, -0.4%)
- North Ayrshire (-540 people, -0.4%)

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<sup>4</sup> [rural-planning-policy-2050-research-inform-preparation-npf4 \(3\).pdf](#)

<sup>5</sup> <https://www.gov.scot/publications/proposed-changes-pre-application-consultation-requirements-planning-consultation/> (Annex D)

<sup>6</sup> <https://www.hie.co.uk/research-and-reports/our-reports/2018/may/31/yp-research/>

<sup>7</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2021/07/national-islands-plan-survey-final-report/documents/national-islands-plan-survey-final-report/national-islands-plan-survey-final-report/govscot%3Adocument/national-islands-plan-survey-final-report.pdf>

<sup>8</sup> [Publication \(nrscotland.gov.uk\)](#)

<sup>9</sup> <https://www.nrscotland.gov.uk/files//statistics/population-estimates/mid-19/mid-year-pop-est-19-report.pdf> - Figure 13, page 26

Areas which experienced the greatest decrease in population aged 0 to 15 were mainly rural and island areas. The five areas (Argyll and Bute, Na h-Eileanan Siar, North Ayrshire, Inverclyde and Dumfries and Galloway) which experienced the greatest decrease in the population aged under 16, also experienced the greatest decline in the population aged 16 to 64.

It went on to note that areas in the highlands and islands of Scotland had the fewest people per square kilometre:

- Na h-Eileanan Siar (9 people per square kilometre)
- Highland (9 people per square kilometre)
- Argyll and Bute (12 people per square kilometre)
- Shetland Islands (16 people per square kilometre)

Settlements data: National Records of Scotland (NRS) - Population Estimates for Settlements and Localities in Scotland, Mid-2016 (2018)<sup>10</sup> states that:

“The council areas with the lowest proportion of people living in a settlement<sup>11</sup> are Na h-Eileanan Siar (30%) and Shetland Islands (38%). Many communities in these islands are sparser than those in the rest of Scotland, due to crofting and other factors, and so do not fulfil the density requirements needed to be counted as a settlement.”

The National Islands Plan Survey Final Report (2021) found that 86% of islanders think they are likely to stay on the island for the next five years. Residents of the Shetland Outer Isles are most likely to think they will stay (93%) and residents of Orkney Outer Isles are least likely (79%); however, this was not a significant difference. Young islanders are significantly less likely to say they will stay (71%) compared to other age groups.

A quarter of island residents agree that young people are supported to remain, move or return to the local area. Agreement with this statement was low across all age groups. Orkney Mainland (39%) and Shetland Mainland (37%) had the highest levels of agreement, although not significantly greater than other subregions.

Rural Planning Policy to 2050: Research report identified demographic trends as one of the 6 key challenges for rural areas, due to both falling population numbers and

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<sup>10</sup> <https://www.nrscotland.gov.uk/files//statistics/settlements-localities/set-loc-16/set-loc-2016-publication-updated.pdf>

<sup>11</sup> A settlement is defined to be a group of high density postcodes whose combined population rounds to 500 people or more. They are separated by low density postcodes

changes to the population profile. Research participants expressed concern over the capacity of rural communities to sustain themselves and to develop and grow into the future. When asked in the survey if this challenge affects all rural areas, or only certain types of rural area, the majority (65% of those who responded to this question) said it affects all areas, while 33% said it affects certain types of rural area, with particular reference to islands, coastal areas, remote areas, “areas hard to reach by road”, sparsely-populated areas, fragile areas, “smaller communities” and “dispersed communities”.

### Economic Development (including Retail and Tourism)

The National Islands Plan Survey Final Report (2021) showed that young people (aged 18 to 35) are significantly more positive about all measures of job availability, compared to other age groups. 31% of island residents agree that there are jobs available to suit different interests, skills and ambitions in the local area.

31% of island residents agree that there are job opportunities in low carbon and renewable energy. Highest agreement was reported by residents in Orkney Mainland (76%), whilst the Argyll Islands (6%), and Bute, Arran and Cumbrae (10%) reported significantly lower agreement.

Young People and the Highlands and Islands (2018): Most young people in the Highlands and Islands want to work full time, but for nearly 40% a lack of local opportunities is a barrier. This is particularly so for females<sup>12</sup>, those living in remote and fragile areas and 19-24 year olds. Housing, know-how, confidence and experience were also cited as barriers to achieving employment goals by around a fifth of young people. Small businesses are relatively more prevalent as employers in rural areas, with 68% of private sector employees in remote areas working for small businesses and 54% in accessible areas, compared to 32% in the rest of Scotland<sup>13</sup>. There is significant appetite amongst young people to start their own business, and many feel they have the business idea to do so; however access to finance is a barrier for many young people to start-up businesses. Many young people want to work in the region but feel that there is a lack of employment and career progression opportunities compared to elsewhere, particularly within graduate posts. Lack of employment opportunities is a critical issue to be tackled to make the Highlands and Islands more attractive to young people.

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<sup>12</sup> [Rural Planning Policy to 2050: research findings - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/rural-planning-policy-to-2050-research-findings/pages/12/)

<sup>13</sup> Kleinert et al. 2018, pp. 13-18 - Kleinert, E., Beale, G., Henderson, N. & Davidson, N. 2018 Understanding the Scottish Rural Economy. Edinburgh: Scottish Government. [https://www.gov.scot/publications/understanding-scottish-rural-economy/](https://www.gov.scot/publications/understanding-scottish-rural-economy/pages/13-18/) - :-.text=The economy of rural Scotland is both similar,significant structural change over the past twenty years.

Research has identified areas of Scotland that are expected to be most vulnerable to the consequences of EU Exit. An accompanying interactive map<sup>14</sup> allows for more granular analysis of each datazone in Scotland.

Key findings were that:

- The risks presented by EU Exit are anticipated to have significant social and economic consequences for all areas of Scotland.
- Many of the areas most vulnerable to EU Exit are in rural locations, in particular on the Scottish islands.

Rural Planning Policy to 2050: Research report: identified structural changes in the rural economy as a key challenge for rural areas, including the islands. The rural economy is often equated with agriculture, forestry and fishing but, while this sector remains important for many areas, it no longer represents the major component of the economy. Recent Scottish Government research<sup>15</sup> has found that the contribution of agriculture, forestry and fishing to the Gross Value Added (GVA) of Scotland's Local Authority areas varies from 4% for 'islands and remote rural' Authorities and 3% for 'mainly rural' Authorities to 1% in 'urban with substantial rural' Authorities. Unemployment is lower in rural than in urban Scotland, and employment and activity rates are higher.

In terms of retail, employment and types of shops available, Understanding Scotland's Places provides data to help understand the function of towns and provides the opportunity to compare and contrast towns across Scotland. It provides data on the number of people per shop, retail sector employment and the Diversity of Retail.

This is the percentage of retail types in the town in relation to 37 different retail types) the data below is sourced from Understanding Scotland's Places, which gathers data from the Business Register and Employment Survey The higher the percentage, the greater diversity of retail types. – this shows that towns on the islands have a varying range of retail types on offer for their communities.

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<sup>14</sup> <https://scotgov.maps.arcgis.com/apps/opsdashboard/index.html#/35590be803944353a244cccd0d8f78e0>

<sup>15</sup> Kleinert et al. 2018, pp. 13-18 - Kleinert, E., Beale, G., Henderson, N. & Davidson, N. 2018 Understanding the Scottish Rural Economy. Edinburgh: Scottish Government.  
<https://www.gov.scot/publications/understanding-scottish-rural-economy/-:~:text=The economy of rural Scotland is both similar,significant structural change over the past twenty years.>

Fig 1. Diversity of Retail in Island Towns

Local Authority	Town	Number of People Per Shop	Retail Sector (employment) (%)	Diversity of Retail offer (%)
Argyll & Bute	Port Banntyne	302	11%	5%
	Rothesay	33	12%	46%
	Tarbert	23	16%	22%
Highland	Portree	33	8%	30%
Na h-Eileanan Siar	Stornoway	40	10%	54%
North Ayrshire	Millport	28	3%	8%
Orkney	Kirkwall	51	16%	51%
	Stromness	38	7%	24%
Shetland	Lerwick	42	8%	62%

The National Islands Plan Survey Final Report (2021): Less than a third of island residents agree that it is easy for young people (under 40) who want to live and work in their local area to do so. More than half of respondents in Orkney Mainland (53%) and Shetland Mainland (52%) agreed with this statement. These are significantly greater when compared to Skye and the Small Isles (13%) and Arran, Bute and the Cumbraes (14%). Agreement with this statement declined with age. 39% of 18 to 19-year-olds agreed that it is easy for young people to live and work in the local area, significantly more than those aged 66 and over (23%).

The National Islands Plan Survey Final Report (2021) noted that tourism was perceived as a source of job opportunities across the islands, with significantly higher perceived availability in Orkney Mainland (81%), Skye and the Small Isles (81%) and Argyll Islands (74%). The lowest level of agreement that jobs are available in tourism was reported by Shetland Outer Isles (30%).

## Transport

The Transport and Travel in Scotland Results from the Scottish Household Survey 2018 (2019)<sup>16</sup>: indicates in turn that older people were less likely to have travelled the previous day. Only 51 per cent of those aged 80 and over had travelled the previous day and 65 per cent of those aged 70 to 79.

<sup>16</sup> <https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-results-from-the-scottish-household-survey-1/>

That survey also identified a variation in mode of travel by age. The older age group were more likely to catch a bus than younger children (33% compared to 9%), which may indicate older populations are more reliant on public transport.

The National Islands Plan Survey Final Report (2021): There are large variations between island groups with respect to the accessibility of island transport, with patterns of use dictated by island location and infrastructure. Different patterns of transport use are notable between different age groups, with older people making greater use of local buses and mainland ferries, younger people flying to and from the mainland more often, and middle-aged residents (aged 36 to 50) making more use of inter-island ferries.

Just over a third of island residents agree that roads, paths and pavements in their local area are in good condition.

The National Transport Strategy 2: Island Community Impact Assessment<sup>17</sup> (2020): Factors resulting in additional costs for households in island communities compared to the rest of the UK include:

- longer commuting distances compounded by higher fuel prices;
- issues around integrated timetabling;
- the additional cost of the need to make occasional trips to the mainland;
- additional ferry/air costs for inter-island travel.

## Housing

Housing to 2040: Island Communities Impact Assessment<sup>18</sup> (2021): Responses to stakeholder engagement and consultation exercises between 2018 and 2020 emphasised that the availability of affordable homes in island communities was insufficient. It goes on to note that though current policy encouraging new and improved housing is seen as a positive step, respondents reported that the availability of affordable, fit-for-purpose housing on Scottish islands presents a challenge for island communities.

Rural Research to 2050; participants highlighted the provision of adequate housing and appropriate types of housing to be a priority challenge and opportunity. Most survey participants focused on the lack of appropriate housing, especially in more

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<sup>17</sup> [National Transport Strategy 2 - Islands Communities Assessment](#)

<sup>18</sup> [Housing to 2040: island communities impact assessment - gov.scot \(www.gov.scot\)](#)



remote rural areas. Many participants emphasised that the need is not a simple increase in the amount of housing, but increased availability of the right kind of housing. In particular, participants highlighted the need for affordable housing, social housing, better quality housing, sustainable housing and adapted or purpose-built housing for elderly residents. They also highlighted the challenges caused by increases in second home ownership and in the use of houses for tourism lets, which is reducing the housing stock available to residents and pushing up house prices.

Survey participants and interviewees also referred to issues relating to the financing of house building, to the identification of housing needs and to the role of planning policy in relation to housing. This included comment on the higher costs of house building in rural areas and the perception that the statutory process for assessing housing need and demand is under estimating the need and demand in rural areas.

The National Islands Plan Survey Final Report (2021) found that less than half of island residents agree that there is a variety of housing types, sizes and tenures to meet people's needs, with just over a third of island residents agreeing that there is affordable housing locally.

45% of island residents agree that self-build is a viable option for home ownership, with lowest levels of agreement in Arran, Bute and the Cumbraes (23%), and significantly higher levels in Lewis and Harris (56%).

### Poverty Including Fuel Poverty

The Scottish Index of Multiple Deprivation 2020<sup>19</sup> found that people who live in the most deprived areas are most likely to experience conditions which limit their opportunities in life. However, people who live in less deprived areas may also experience disadvantage. The most recent data notes that the three island authorities (Na h-Eileanan an Siar, Shetland and Orkney) have no areas among the 20% most deprived in Scotland; however, this does not mean there are no people experiencing deprivation living there. Levels of deprivation have increased in both Highland and North Ayrshire since 2016. However, none of these increases are greater than 2 percentage points

Housing to 2040: Island Communities Impact Assessment (2021): higher levels of fuel poverty and extreme fuel poverty can be found in all island containing local authorities, except North Ayrshire, compared with Scotland overall as shown in Fig 2.

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<sup>19</sup> [Scottish Index of Multiple Deprivation 2020: introduction - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020/introduction/pages/introduction.aspx)



Fig 2. Fuel poverty and extreme fuel poverty data in island local authorities 2017-19

<b>Local Authority</b>	<b>Fuel Poor</b>	<b>Extreme Fuel Poor</b>
Argyll & Bute	32%	19%
Highland	33%	22%
Na h-Eileanan Siar	40%	24%
North Ayrshire	28%	10%
Orkney	31%	22%
Shetland	31%	22%
Scotland	24%	12%

Reproduced from the Housing to 2040: Island Communities Impact Assessment  
 Source: Scottish House Condition Survey 2017-2019

The National Islands Plan Survey Final Report (2021) showed that 71% of island residents agreed that they could afford to keep their home warm in the past year while 13% could not. Shetland Mainland had significantly lower levels of agreement (63%) than other regions. Over a third of island residents said that their home sometimes felt uncomfortably cold in the winter.

## Digital Connectivity

Ofcom Connected Nation Scotland Report<sup>20</sup> (2020): there are significant differences in the availability of superfast broadband in urban and rural areas of Scotland, with 98% of residential premises in urban areas having access to superfast broadband compared to 72% in rural areas. This is reflected in the superfast coverage data for local authority areas covering some of the more remote and rural parts of Scotland.

Fig 3: Residential superfast broadband coverage by selected Scottish local authority area

Local Authority	% of premises with speeds $\geq$ 30 Mbit/s
Orkney Islands	64%
Shetland Islands	70%
Na h-Eileanan Siar	75%
Argyll and Bute	79%
Highland	81%

Source: Ofcom analysis of operator data

Internet use: is less in older age groups than younger, and that there is a gap between premises in the islands able to access superfast and fibre broadband when compared to premises in other parts of rural Scotland.<sup>21</sup>

The National Islands Plan Survey Final Report (2021): 96% of island households have access to the internet from home. Older residents, aged 66 and over, report slightly but significantly lower levels of access than other age groups, at 92%. 65% of island residents agree that their internet connection at home is fast enough to do what they want online.

Rural Research to 2050 Survey participants and interviewees identified particular issues with the communications network including gaps in mobile phone coverage and the need for improvements in internet access and, in particular, in access to high-speed broadband connections. The research highlighted that participants see the potential benefits of digital infrastructure as transformative for enabling home working, supporting rural businesses and diversification, to helping address the population issues faced in many rural areas.

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<sup>20</sup> [Connected Nations 2020: Scotland report \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/cn2020/cn2020.pdf)

<sup>21</sup> <https://www.gov.scot/publications/proposed-changes-pre-application-consultation-requirements-planning-consultation/pages/15/>

## Health and wellbeing

The National Islands Plan Survey Final Report (2021): 86% of island residents agree that there are places where they can go to take part in sports and physical exercise. Island sub regions differed greatly on the availability of places for sport and physical exercise, with Argyll Islands reporting lower availability than other islands with only 60% agreement. 73% of island residents agree that local sports facilities are good quality and well maintained.

Rural Research to 2050 identified the 'live-ability' of rural areas as a key challenge. This was particularly seen as being the case in Remote and Sparsely Populated areas. The lack of access to services in many rural areas can increase the cost of living and also cause disadvantage by not allowing people to participate fully in society. In comparison to those living in urban areas, rural communities can have greater responsibility placed on them to address their service challenges themselves, and this can result in inequalities because communities have different capacity to respond. The severity and nature of the challenges varies from one type of rural area to another. For example, 91% of people in remote rural areas live within a 15 minute drive time to a GP, compared with 99% in accessible rural areas and 100% of the population in the rest of Scotland. 58% of people in remote areas live within a 15 minute drive time to a secondary school, compared with 92% in accessible areas and 100% in the rest of Scotland.<sup>22</sup>

Responses to the National Council of Rural Advisors' national consultation repeatedly noted challenges relating to: the availability of childcare and of healthcare services, including inadequate provision of carers; parity of costs such as fuel/heating costs and delivery costs/charges; declining high street services such as post offices and banks, and; declining resources for community spaces that support recreation and connectedness<sup>23</sup>. Some participants in this consultation considered that access issues are important for tackling exclusion and inequality.<sup>24</sup>

## Environment and Climate Change

The National Islands Plan Survey Final Report (2021): Island residents agree that the air quality is good (98%), they see a lot of wildlife (91%) and there are green or

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<sup>22</sup> Kleinert 2018, p.44 <https://www.gov.scot/publications/understanding-scottish-rural-economy/-:~:text=The economy of rural Scotland is both similar,significant structural change over the past twenty years.>

<sup>23</sup> The Lines Between 2018b, p.17 <https://consult.gov.scot/agriculture-and-rural-communities/a-rural-conversation/results/nkraconsultationanalysis.pdf>

<sup>24</sup> The Lines Between 2018b, p.20 <https://consult.gov.scot/agriculture-and-rural-communities/a-rural-conversation/results/nkraconsultationanalysis.pdf>

blue spaces within a 5-minute walk of their home (91%), however just 67% of residents agree that their local environment is clean and litter free.

Data from the Third State of Scotland's Greenspace Report<sup>25</sup> shows that most of the island authorities have a higher percentage of greenspace as a percentage of urban land area (>60%) compared to the majority of mainland Scotland. However, in contrast, Orkney has the lowest percentage of all the 32 local authorities (<40%).

The figures show that compared to urban Scotland, island authorities generally have a lower percentage of their greenspace as public parks or gardens, typically <1% compared with 4% in urban Scotland. Most of the island authorities have a higher percentage of natural greenspace than urban Scotland (20%), e.g. Shetland 63%, Western Isles 58% however Orkney has a lower proportion at 14%. Orkney has a higher % of its greenspace as school ground and playing fields, than the other island authorities and the urban Scotland average.

It is observed that across both urban and the island authorities, play space generally constitutes less than 1% of total green space areas; with Orkney showing 1%.

15% of island residents have installed equipment to generate renewable energy for use in their home. Proportions are significantly higher in Orkney Outer Isles (36%) and Orkney Mainland (22%) than other island regions.

Survey participants from the Rural Planning Research to 2050: highlighted the opportunities for employment in areas driven by climate change mitigation, such as forestry and peatland conservation. There was also mention of the opportunities in moves towards "eco-friendly living" and in delivering public goods such as ecosystem and environmental conservation and enhancement, with support in the form of public funding for farmers.

## Historic Environment

Historic environment assets make an important contribution to island communities, promoting a sense of belonging and cultural identity. The number of 'buildings at risk' identified in island towns according to USP<sup>26</sup> is below:

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<sup>25</sup> Third State of Scotland's Greenspace Report (2018) Greenspace Scotland  
<https://www.greenspacescotland.org.uk/faqs/greenspace-mapping>

<sup>26</sup> Portree | Understanding Scottish Places ([usp.scot](http://usp.scot))

Fig 4: Island Towns: Buildings at Risk

Rothesay	Tarbert	Port Banntyne	Portree	Millport	Kirkwall	Stromness	Lerwick	Stornoway
19	0	5	1	6	7	3	4	6

The Buildings at Risk Register<sup>27</sup>, maintained by Historic Environment Scotland, provides information on properties of architectural or historic merit that are considered to be at risk.

### Community Empowerment

The National Islands Plan Survey Final Report (2021): Island residents generally perceive that they have little influence over decisions made by local and national organisations, and more influence over community organisations and community councils, particularly in the Outer Isles of Orkney and Shetland, where around half of residents feel they can influence decisions made by their community council. 42% of younger people (aged 18 to 35) compared to 30% of older people (aged 66 and over) report that they can influence decisions made by community organisations such as Development Trusts and community groups.

Young People and the Highlands and Islands (2018): levels of community participation varied by geography, with the highest levels reported by young people in Orkney (81%), Shetland (72%) and the Outer Hebrides (70%).

### Arts and Culture

Young People and the Highlands and Islands (2018): Young people in island communities seem to engage more frequently than young people in other areas with arts, leisure and culture. This may reflect ease of access to outdoor activities and attractions, but also a sense of making the most of what is available when it is available. In general, barriers relate to limited accessibility rather than the quality of amenities or a lack of interest amongst young people. The main barrier to taking part in arts, leisure and cultural activities is a lack of local availability. Cost and a lack of transport to reach them were also frequently cited.

The National Islands Plan Survey Final Report (2021): Experiences of culture and language vary considerably across island groups, age groups and genders, with different patterns of cultural participation and perceptions of the extent to which island culture is supported. Of note, residents of Orkney Mainland and Shetland

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<sup>27</sup> [Welcome to Buildings at Risk Register | Buildings at Risk Register](#)

Mainland are most likely to feel that there is investment in cultural and historic places, and that islanders' creative talents are supported and nurtured.

Housing to 2040: Island Communities Impact Assessment (2021): participants in rural areas and islands generally highlighted the need for more amenities in rural and island towns, particularly for young people.

## Education

The National Islands Plan Survey Final Report (2021): Perceptions of the quality of education available locally are very positive with regard to primary education but decrease notably in some islands in relation to secondary education, likely due to limited subject availability. Agreement rates with respect to college and university education and professional qualifications are successively lower, with more positive perceptions among those living in island groups where there are small towns.

### D.3. Consultation

The Scottish Government has so far undertaken two rounds of consultation. An NPF4: Call for Ideas was undertaken over Spring 2020. This was followed by consultation on an NPF4: Position Statement over Winter 2020 / Spring 2021. Accompanying these two documents was an NPF4: Integrated Impact Assessment which provided the evidence base for societal impacts, including potential impacts on island communities.

The NPF4: Call for Ideas included a Scotland2050 Roadshow. Events were planned for Bute, Orkney, Shetland mainland and Stornoway in February / March 2020. Due to the impact of the COVID-19 pandemic, the events in Shetland and Stornoway were unfortunately cancelled. In response to an individual request, a meeting was also held on Skye to discuss accessibility issues.

In response to the Call for Ideas, the Scottish Government's recognition of the particular planning-related challenges and opportunities arising from the special circumstances of island communities was welcomed. In the drafting of NPF4, there was a call for the Scottish Government to continue to take the unique character and setting of island authorities into consideration, including by 'islands proofing' NPF4.

The Call for Ideas highlighted a number of policy areas where Island communities are facing unique challenges, including issues around housing, population decline, coastal planning and the need to ensure that local services meet the needs of communities and businesses. Some respondents highlighted the recommendations made in the Island Communities Impact Assessment that accompanied the Planning (Scotland) Act 2019.

The NPF4: Position Statement was published in November 2020. It reflected on the wealth of information received through the Call for Ideas engagement programme. It recognised the need for the active promotion of working and living in rural Scotland and the islands.

Responses<sup>28</sup> were received from five of the six island authorities plus businesses and representative bodies with an interest in island matters such as fisheries, aquaculture and renewable energy. Key issues raised included:

- the economic significance of the food and drink sector, particularly for rural and island communities.
- rural and island communities are very varied in terms of the scale and type of development that may be sustainable. The need to ensure that development is supported by sustainable infrastructure, including transport and digital connectivity.
- how the 20 minute neighbourhood concept would apply, or not, in a rural or island context.
- the critical importance of good digital infrastructure, particularly for remote rural and island communities.
- support for a change of policy approach to actively promote working and living in rural and island areas.

In addition to the formal consultation, we commissioned PAS to undertake workshops with communities and youth groups across Scotland. Community representatives noted that fuel and transport poverty lead to inequalities and affect islands disproportionately.

PAS worked with organisations such as the Orkney Youth Forum in developing its NPF4 Youth Engagement Report<sup>29</sup>. The report concluded that, following discussion with approximately 200 young people located across Scotland (from the Scottish Borders to Orkney), that the responses generally do not differ significantly according to location. There were concerns linked to the climate change agenda as well as specific requests for more protection of the current environment for young people. Any new development needs to be accessible for all and located where there is other social provision. Rural and remote areas need reliable electricity and broadband links in order for people to be able to work from home and to have social (virtual) interaction. Overall, the young people would like to see improvements; from their local neighbourhoods which could be implemented over a short period, to implementation of renewables, to housing, and to have a discussion on flexibility in

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<sup>28</sup> <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement-analysis-responses-consultation/documents/>

<sup>29</sup> <https://www.transformingplanning.scot/media/2267/npf4-youth-engagement-report-pas-april-2021.pdf>

future workplaces. They also understand the built environment and planning system have far reaching impacts regarding climate change, wellbeing and addressing inequality.

We also commissioned research on Rural Planning Policy to 2050 to inform the preparation of NPF4. The research explored, from a land use planning perspective, the current challenges and the future opportunities for land use diversification in rural Scotland. It considered how planning policy can support strong and vibrant rural communities and economies in the coming years. The research included an extensive literature review, and a programme of stakeholder engagement, including an online survey, phone interviews and workshops.

There were relatively few comments on the IAA Update Report accompanying the Position Statement, albeit a number of respondents expressed broad support. It was suggested that national-level data could miss or conceal local issues and that regional and locally granular data be used as far as possible.

In July 2021 the Scottish Government published The National Islands Plan Survey Final Report. The report, based on 4,347 people's responses to a survey from 59 islands, provides baseline data against which to measure the effectiveness of the National Islands Plan. The report provides a valuable resource on the perceptions of island communities. It covers key areas of importance to the planning system and its interaction with island communities namely:

- Population
- Economic Development (including Tourism)
- Transport
- Housing
- Fuel Poverty
- Digital Connectivity
- Health and Wellbeing
- Environment and Climate Change
- Community Empowerment
- Arts and Culture
- Education

#### **D.4. Potential issues and mitigation**

Scotland's north and west coast and islands will be at the forefront of our efforts to reach the Scottish Government's target of net zero emissions by 2045. Draft NPF4



provides for a specific spatial strategy which recognises the diversity of this area, from Shetland and Orkney in the north, to the Outer and Inner Hebrides and the coastal areas of Argyll and Bute and Highland. The relatively high levels of community land ownership and strong ties with the land and sea reflect the area's strong sense of place and local resilience.

From the evidence set out so far, the main potential issues for island communities appear to be a lack of:

- support for young people to remain, move or return to the islands;
- employment, training and higher education opportunities;
- access and affordability to transport
- a variety of housing types, sizes and tenures to meet people's needs and a lack of affordable housing;
- speed and reliability of internet/ phone connections;
- influence over decisions made by local and national government; and
- adequate infrastructure for the number of tourists attracted to the islands.

NPF4 will seek to tackle these issues through the spatial strategy and thematic policies while providing flexibility at the local development plan stage for local and specific island circumstances to be recognised.

Support for young people to remain, move or return to the islands

- To reverse past depopulation, planning can help to sustain communities in more peripheral and fragile areas in a way that is compatible with our low carbon agenda and resilient to climate change impacts.
- Local liveability will benefit people as well as the planet. Island and coastal communities will need a bespoke approach to building networks of 20 minute neighbourhoods to further strengthen their long term resilience and self-reliance. To facilitate this bespoke approach, local development plans should apply the concept of 20 minute neighbourhoods in the spatial strategy through site briefs or development proposals. With the concept applying differently in rural and urban areas.
- Island and coastal communities will need a bespoke and flexible approach to the concept of 20 minute neighbourhoods, for example by identifying service hubs in key locations with good public transport links. Hubs can sustain a range of functions. Ports and harbours can be a focal point for electric vehicle charging as well as employment. Sustainable and fair access to affordable healthier food will support future resilience and broader objectives including reduced child poverty and improved health outcomes.

- Taking an infrastructure first approach will support the provision of the infrastructure, services and facilities that are necessary to create liveable and sustainable places. It can also support our drive towards a more sustainable approach to infrastructure, making better use of existing assets and prioritising low-carbon infrastructure, supporting Scotland's transition to net zero.

#### Employment, training and higher education opportunities

As a result of its natural advantages, the area is growing its research excellence, and innovation centres are emerging on Orkney, Shetland and the Outer Hebrides, as part of the Islands Growth Deal, that will form a planned joint Islands Hub for Net Zero.

- Sea ports are a focus for investment in the blue economy and further diversification of activities could generate additional employment across the area. Potential for business development ranges from long-distance freight to supporting the cruise and marine leisure sectors and decommissioning opportunities. New infrastructure and repurposing of land will help to shift industrial activity towards supporting the offshore renewables sector.
- Regionally and locally there is a need for smaller scale investment across the area to put in place low maintenance, carefully designed facilities which better support and manage the impact of informal tourism including camping, campervans and day trips. This should reflect the scale and nature of operators including community trusts. Efforts to provide access to education and build skills locally will also support this, with key projects including plans for the redevelopment of the Shetland Campus.

#### Access and affordability of transport

- Communities will need resilient transport connectivity to maintain accessibility and lifeline links and further innovation will be required to help modernise connections and decarbonise transport systems. A net zero islands air network and decarbonisation of ferry services will help to secure the viability and service stability of island and remote coastal communities. Communities are keen to explore long term ambitions for fixed links for example across the Sound of Harris and Sound of Barra, and potentially to connect the Outer Hebrides to mainland Scotland. An Islands Connectivity Plan will consider the role of ferries, fixed links and low carbon aviation in securing lifeline links and marine access for both leisure and freight.
- To provide a local focus, local development plans should be informed by an appropriate and effective transport appraisal. Plans should be informed by evidence of the area's transport infrastructure capacity, and by an appraisal of the plan's spatial strategy, and reasonable alternatives to it, on the transport network.

A variety of housing types, sizes and tenures to meet people's needs and a lack of affordable housing;

- Scotland's National Islands Plan<sup>30</sup> aims to grow the population and economy, improve transport and housing, and ensure island communities are served by the facilities, jobs, education and services they need to flourish. Communities will need greater choice and more flexible and affordable homes to support varying needs. This can be achieved to an extent by refurbishing the existing building stock to reduce the release of embedded carbon, as well as by delivering more affordable, energy efficient new homes.
- There is a clear need for affordable housing provision across the region to improve choice and access to homes, and in some areas to help offset the impact of second home ownership and short term lets on the market. Local solutions may include key worker housing, temporary homes for workers in remote areas, self-provided homes, including self-build and custom build.
- Continued innovation of holistic place based solutions, such as the Rural Housing Initiative, will be required to create homes that meet diverse community needs, including homes for an ageing population and to help young people to stay in or return to their communities. Greater efforts to ensure young people have more influence in decisions that affect their future places could support this, as well as helping more people access land and crofts and the reuse of abandoned buildings and sites where appropriate.

Speed and reliability of internet connections;

- Improved digital connectivity is a priority to sustain current businesses and create 'smart' communities. We are committed to investment in ultrafast broadband to ensure every property is connected and to improve mobile coverage. This will unlock opportunities for rural businesses and remote working, and make future community growth more feasible. Full benefits will be realised by actively tackling the digital divide by building skills, literacy and learning and addressing the financial barriers to internet access. Key projects include the Outer Hebrides Giga Fibre Network and the North Isles Fibre Project.
- A local focus will be provided as local development plans. Local development plans should support the delivery of digital infrastructure, particularly in areas with gaps in connectivity and barriers to digital access. Development proposals that deliver new digital services or provide technological

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<sup>30</sup> Introduced as a result of the Islands (Scotland) Act 2018

improvements, particularly in areas with no or low connectivity capacity, should be supported.

#### Influence over decisions made by local and national government

- A place based approach is at the heart of creating a more sustainable and fair Scotland. The planning system should apply the Place Principle which commits us to take a collaborative place based approach to future development. This must involve working with stakeholders and local communities to create liveable, healthier and sustainable places that improve lives, builds economic prosperity and contribute to net zero and environmental ambitions.
- People living and working on islands are best placed to help decide how their communities can grow in a way that meets their needs and so it is essential they are involved in planning their future development. The introduction of Local Place Plans should support island communities in developing their aspirations. The ICIA<sup>31</sup> accompanying the recent consultation on Local Place Plan regulations noted examples of community led planning in island communities across all six island authorities.

#### Adequate infrastructure for the number of tourists attracted to the islands.

- Targeted investment in tourism infrastructure will ensure the coast and islands can capitalise on their rich cultural heritage and historic environment assets to support better quality and more stable jobs in the sector.
- Regionally and locally there is a need for smaller scale investment across the area and in other parts of Scotland to put in place low maintenance facilities which better support and manage the impact of informal tourism including camping, campervans and day trips.
- Tourism and access to the outdoors can benefit from continued investment in supporting tourism and access to the outdoors by sustainable modes with a range of projects emerging at a regional scale.
- As noted above, there is a clear need for affordable housing provision across the region to improve choice and access to homes, and in some areas to help offset the impact of second home ownership and short term lets on the market.

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<sup>31</sup> [Local place plans - proposals for regulations: consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/local-place-plans-proposals-for-regulations-consultation/pages/11.aspx)

- For a local focus, proposals for new homes that improve affordability and choice should be supported. An equalities led approach to addressing identified gaps in provision should be taken, informed by the Evidence Report or Local Housing Strategy, whichever is latest. This could include: self-provided homes; accessible, adaptable and wheelchair accessible homes; build to rent; affordable homes; a range of size of homes such as those for larger families; homes for older people; people undertaking further and higher education; and other specialist groups.

## **D.5. Conclusion**

Draft NPF4 brings together people's thoughts, views and aspirations for how Scotland should develop out to 2045. The evidence from those living in our island communities has helped to develop our understanding of how Scotland can develop, reflecting the specific circumstances of island communities.

This draft is subject to Parliamentary scrutiny and further public consultation.

We consider that the island focussed element of the spatial strategy, combined with the scope for underlying local policies to fit with local circumstances, will achieve beneficial impacts for different island communities. However, we will undertake further consultation with island communities to seek to maximise these benefits. A final assessment of the impact of these policies will be published alongside the adopted NPF4.

Planning and Architecture Division

Scottish Government

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