

National Planning Framework 4 – Integrated Impact Assessment – Post Adoption Statement

April 2023

Table of contents

1. Introduction	3
2. The Integrated Impact Assessment process	4
2.1. What Impact Assessments have been undertaken?	4
2.2. Post Adoption Statement Structure.....	4
2.3. Strategic Environmental Assessment	4
2.4. Society and Equalities Impact Assessment	5
2.5. Business and Regulatory Impact Assessment.....	6
3. Integration of key considerations into National Planning Framework 4	8
3.1. Introduction	8
3.2. Environmental considerations.....	9
3.3. Societal and equality considerations.....	10
3.4. Business and regulatory considerations	11
4. How the Integrated Impact Assessment has been taken into account	12
4.1. Environmental Report and supporting information.....	12
4.2. Society and Equalities assessments.....	15
4.3. Business and Regulatory Impact Assessment.....	21
5. How the opinions expressed have been taken into account.....	23
5.1. Consultation and Engagement.....	23
5.2. Comments on the Draft National Planning Framework 4	24
5.3. Comments on the Environmental Report	27
5.4. Comments on the Society and Equalities Impact Assessment	29
5.5. Comments on the Partial Business and Regulatory Impact Assessment	33
6. Reasons for selecting National Planning Framework 4 as adopted.....	35
7. Monitoring.....	37
7.2. Spatial Strategy	37
7.3. National Developments.....	37
7.4. National Planning Policies	38
8. Appendix A – Fairer Scotland Duty Assessment Template.....	39
8.1. Template details	39
8.2. Stage 1 - Planning	40
8.3. Stage 2 - Evidence.....	42
8.4. Stage 3 – Assessment and Improvement	43

8.5.	National Developments.....	46
8.6.	Stage 4 - Decision.....	47

1. Introduction

- 1.1.1 Following a review of Scotland's National Planning Framework (NPF), National Planning Framework 4 (NPF4) was adopted and published by the Scottish Ministers on 13 February 2023.¹
- 1.1.2 NPF4 is a long-term spatial plan for Scotland. It sets out the key priorities for 'where' and 'what' development should take place at a national level and is combined with national planning policy on 'how' development planning should manage change. NPF4 replaces NPF3 and Scottish Planning Policy.
- 1.1.3 NPF4 has been informed by three rounds of wide ranging public consultation, beginning with a 'Call for Ideas'² in early 2020. In November 2020 the Scottish Government published a Position Statement³ setting out an overview of key challenges, opportunities and potential policy changes, having reflected on the wealth of information and views received through the Call for Ideas. The Position Statement also reflected on the impacts of COVID-19 and what NPF4 could do to help societal and economic recovery. A draft NPF4⁴ was laid in the Scottish Parliament in November 2021 for 120 days of parliamentary scrutiny. Finally, a Revised Draft NPF4 was laid in the Scottish Parliament on 8 November 2022 and was approved by Parliament on 11 January 2023.
- 1.1.4 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 iterative development of NPF4. Where possible, these assessments have been integrated into the NPF4 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. This Post Adoption Statement sets out how the assessment findings and the consultation responses have been taken into account in finalising NPF4. It meets our statutory and other reporting obligations including those under the Environmental Assessment (Scotland) Act 2005.

¹ [National Planning Framework 4 - gov.scot \(www.gov.scot\)](https://www.gov.scot)

² [Call for Ideas | Transforming Planning](#)

³ [Fourth National Planning Framework: position statement - gov.scot \(www.gov.scot\)](https://www.gov.scot)

⁴ [Scotland 2045 - fourth National Planning Framework - draft: consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot)

2. The Integrated Impact Assessment process

2.1. What Impact Assessments have been undertaken?

2.1.1 In January 2020 we published our Integrated Impact Assessment (IIA) screening / scoping report, and published our initial evidence base⁵ and invited feedback. In November 2021 we published our IIA Reports for comment alongside ‘Scotland 2045 - Our Fourth National Planning Framework - Draft’⁶.

2.1.2 Further information on the IIA Reports and supporting information which have informed NPF4 preparation is available online at [Integrated Impact Assessment | Transforming Planning](#).

2.2. Post Adoption Statement Structure

2.2.1 This Post Adoption Statement sets out how the findings of the IIA and the views received have been taken into account as NPF4 was finalised. It incorporates the information required under Section 18(3) of the Environmental Assessment (Scotland) Act 2005 and details:

- how the environmental, society & equalities, and business & regulatory considerations have been integrated into NPF4;
- how the IIA Report (including the Environmental Report) has been taken into account;
- how the opinions of consultees have been taken into account;
- the reasons for choosing the NPF4 as adopted, in light of the other reasonable alternatives considered; and
- the measures to be taken to monitor the effects of the implementation of NPF4.

2.3. Strategic Environmental Assessment

2.3.1 The Environmental Assessment (Scotland) Act 2005 (the ‘2005 Act’) requires public bodies in Scotland to carry out a Strategic Environmental Assessment (SEA) of certain plans, programmes and strategies. SEA is a

⁵ [NPF4 Impact Assessment Screening / Scoping Report \(transformingplanning.scot\)](#)

⁶ [Integrated Impact Assessment | Transforming Planning](#)

way of examining plans, programmes and strategies as they develop, to identify any likely significant effects they may have on the environment. It also aims to identify opportunities to avoid or minimise any potentially significant adverse effects on the environment, and looks for opportunities to enhance a strategy's environmental performance.

- 2.3.2 The SEA was in turn supported and informed by early and emerging findings from a Habitats Regulations Appraisal⁷, and by research on the Lifecycle Greenhouse Gas Emissions of NPF4's proposed national developments. The likely health effects of proposed national developments were also considered as part of the SEA process.

2.4. Society and Equalities Impact Assessment

- 2.4.1 NPF4 has been informed by a Society and Equalities impact assessment⁸ (SEQIA) incorporating:

- **Equalities Impact Assessment (EQIA) – including human rights considerations:** 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 policy may impact, either positively or negatively, on different sectors of the population in different ways.
- **Child Rights and Wellbeing Impact Assessment (CRWIA):** Used to identify, research, analyse and record the impact of 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.
- **Fairer Scotland Duty (FSD):** Aiming 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

⁷ A finalised Habitats Regulations Appraisal of NPF4:HRA Record, and Updated Lifecycle Greenhouse Gas Emissions findings research were also published to accompany the Revised Draft NPF4. Accessible online at: [Integrated Impact Assessment | Transforming Planning](#)

⁸ [Scotland 2045: fourth National Planning Framework - draft: society and equalities impact assessment - gov.scot \(www.gov.scot\)](#)

Part 1 of the Equality Act 2010, and came into force in Scotland in April 2018.

- **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.

2.5. Business and Regulatory Impact Assessment

2.5.1 Business and Regulatory Impact Assessment (BRIA) looks at the likely costs, benefits and risks of proposals or policy changes that may have an impact on the public, private or third sector.

2.5.2 The BRIA explains:

- the reason why the Scottish Government is proposing to intervene;
- options the Scottish Government is considering, and which one is preferred;
- how and to what extent new policies may impact on Scottish Government, businesses and on Scotland's competitiveness;
- the estimated costs and benefits of proposed measures.

2.5.3 It is considered best practice to complete a BRIA as part of the policy making process, with the content of a BRIA proportionate to the policy matters to be addressed.

2.5.4 The NPF4 Call for Ideas⁹ and subsequent consultation on the NPF4 Position Statement¹⁰ provided opportunities to build up an evidence base on the potential impacts of the draft NPF4¹¹. A Partial BRIA¹² accompanied the draft NPF4 and formed part of the IIA published in November 2021, and highlighted some of the areas which were thought likely to be impacted. A

⁹ [Call for Ideas | Transforming Planning](#)

¹⁰ [Fourth National Planning Framework: position statement - gov.scot \(www.gov.scot\)](#)

¹¹ [Scotland 2045 - fourth National Planning Framework - draft: consultation - gov.scot \(www.gov.scot\)](#)

¹² [Scotland 2045: fourth National Planning Framework - draft: partial business and regulatory impact assessment - gov.scot \(www.gov.scot\)](#)

finalised BRIA¹³ was published alongside the Revised Draft NPF4 on 8 November 2022.

¹³ [National Planning Framework 4: final business and regulatory impact assessment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-4/final-business-and-regulatory-impact-assessment/pages/12.aspx)

3. Integration of key considerations into National Planning Framework 4

3.1. Introduction

3.1.1 NPF4 sets out how we will work together in the coming years to improve people's lives by making sustainable, liveable and productive places. This will play a key role in delivering on the United Nations Sustainable Development Goals¹⁴, as well as our national outcomes¹⁵. The Planning (Scotland) Act requires the NPF to contribute to 6 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, within the meaning of the Climate Change (Scotland) Act 2009, contained in or set by virtue of that Act; and,
- securing positive effects for biodiversity.

3.1.2 Part 1 of NPF4 sets out a spatial strategy for Scotland, identifying

- 6 spatial principles which will influence all plans and decisions:
 - Just transition
 - Conserving and recycling assets
 - Local living
 - Compact urban growth
 - Rebalanced development
 - Rural revitalisation

¹⁴ [Take Action for the Sustainable Development Goals - United Nations Sustainable Development](#)

¹⁵ [National Outcomes | National Performance Framework](#)

- 3 themes, linked to the United Nations Sustainable Development Goals and Scottish Government National Performance Framework:
 - Sustainable places where we reduce emissions, restore and better connect biodiversity
 - Liveable places where we can all live better, healthier lives
 - Productive places where we have a greener, fairer and more inclusive wellbeing economy

3.1.3 Further detail on the integration of key considerations is set out below.

3.2. Environmental considerations

3.2.1 From the outset, the vision of NPF4 has been to give priority to the climate emergency and nature crisis. NPF4 sets out a strategy for working towards a net zero Scotland by 2045. The NPF4 policies and spatial strategy will work together to help reduce emissions from energy, transport, land use and the built environment.

3.2.2 The preparation of the environmental baseline for the SEA helped to frontload environmental considerations into the draft framework. Early engagement with the SEA Consultation Authorities (Historic Environment Scotland, NatureScot, and the Scottish Environment Protection Agency (SEPA)) assisted in highlighting key environmental issues for further consideration, and identified the potential for likely significant effects to occur across all the SEA topics¹⁶ which were therefore scoped into the assessment.

3.2.3 Selection of the national developments which help to deliver the spatial strategy was informed by emerging information from relevant impact assessments, including SEA and early stages of the Habitats Regulations Appraisal (HRA). The SEA included an assessment of the likely health effects of proposed national developments, and also took into account research findings on the assessment of lifecycle greenhouse gas emissions of proposed National Developments¹⁷.

3.2.4 The following criteria were published in early 2020 to support people in submitting suggestions for national developments and to structure the assessment of those suggestions:

¹⁶ [Environmental Assessment \(Scotland\) Act 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

¹⁷ [Supporting documents - National Planning Framework 4 - lifecycle greenhouse gas emissions: assessment findings - gov.scot \(www.gov.scot\)](https://www.gov.scot)

- 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.

3.3. Societal and equality considerations

- 3.3.1 The purpose of planning is to manage the development and use of land in the long term public interest. Inequality, between different parts of Scotland and across communities, has been highlighted as a key challenge that future planning can help to address, aligned to the national outcomes and UN Sustainable Development goals.
- 3.3.2 From the outset, societal and equalities considerations have informed the preparation of NPF4. Early framing considerations were based on information contained in the EQIA¹⁸ published to support consideration of the Planning Bill. Building on this, baseline information was published as part of the early evidence gathering phase and views invited, including on evidence gaps and proposed actions to alleviate these¹⁹. Through this iterative approach, the emerging society and equalities evidence base and the comments received have helped to shape the final NPF4.
- 3.3.3 Alongside parliamentary scrutiny, public consultation has included a range of events, round table discussions and workshops, involving communities, children and young people, equalities interests and businesses. We engaged with the Scottish Youth Parliament and worked with PlayScotland to hold two workshops. Grants were offered to community organisations to support events they ran themselves.

¹⁸ [Planning Bill - post stage 2: equality impact assessment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/planning-bill-2022-23/equality-impact-assessment/pages/2.aspx)

¹⁹ [national-planning-framework-4-integrated-impact-assessment-position-statement-update-on-ija.pdf \(transformingplanning.scot\)](https://www.gov.scot/publications/national-planning-framework-4-integrated-impact-assessment-position-statement-update-on-ija/pdf/pages/1.aspx)

3.4. Business and regulatory considerations

- 3.4.1 NPF4 was always set to be a high-level document likely to impact on all business sectors across Scotland, and in particular those who engage with the planning system through the submission of planning applications.
- 3.4.2 The NPF4 Call for Ideas²⁰ and public consultation on the Position Statement²¹ attracted significant comments from both business representative bodies and individual companies. The Scottish Government also engaged individually with a range of business interests as part of the policy development process. The comments received almost exclusively focussed on how policies could be developed so that the high level outcomes in the Position Statement could be achieved, including the contribution that specific business sectors could make. These comments and the subsequent BRIA evidence base helped to ensure that key business considerations were taken into account.

²⁰ [Call for Ideas | Transforming Planning](#)

²¹ [Fourth National Planning Framework: position statement - gov.scot \(www.gov.scot\)](#)

4. How the Integrated Impact Assessment has been taken into account

4.1. Environmental Report and supporting information

- 4.1.1 The Integrated Impact Assessment Environmental Report²² set out the assessment findings for the draft NPF4²³. Overall, the following likely significant environmental effects were identified:
- 4.1.2 **Biodiversity, flora and fauna:** The emphasis on protecting and enhancing biodiversity was identified as being likely to lead to significant long term cumulative positive effects on biodiversity, flora and fauna, including through new policies on enhancing biodiversity.
- 4.1.3 **Climatic factors:** Collectively, the draft policies and proposals were identified as being likely to have significant long term positive effects on climatic factors, contributing to reduced greenhouse gas emissions, and helping to facilitate a transition to net zero. As they embed actions to increase community and infrastructure resilience to extreme weather events, the policies and proposals can also support adaptation to climate change.
- 4.1.4 **Air:** Policies and proposals which reduce emissions overall are likely to have cumulative positive effects on air quality. Negative impacts on noise and air quality, including dust and odour, may arise during construction of the national developments. These will be temporary and local in nature, and will be managed at the stage when specific projects are brought forward for consent.
- 4.1.5 **Water:** The overall focus on climate change and climate change adaptation will have cumulative positive effects on water through increased focus on flood risk, water shortages and coastal erosion. It was identified that draft NPF4 policies and proposals may also help improve water supply and waste-water systems. It was noted that proposals for waterfront developments and new development at ports and harbours may negatively impact water during construction and operational phases, and will require management at the stage when specific projects are brought forward for consent.
- 4.1.6 **Soil:** Aspects of the draft NPF4 were identified as likely to have positive cumulative benefits for soils. Policies relating to woodland expansion and green infrastructure can help improve soil stability and drainage, and can help to improve the quality of places. Positive cumulative effects on soils can also arise through an emphasis on the reuse of derelict and vacant land, with

²² [Scotland 2045: fourth National Planning Framework - draft: integrated impact assessment - environmental report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft-integrated-impact-assessment-environmental-report/pages/22)

²³ [Scotland 2045 - fourth National Planning Framework - draft: consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft-consultation/pages/23)

secondary positive impacts on water quality. The potential for negative effects on soils was identified as arising from some of the proposed national developments.

- 4.1.7 **Cultural heritage and Historic Environment:** Significant positive cumulative effects were identified given the emphasis within the draft NPF4 on protecting and enhancing locally, regionally, nationally and internationally valued historic assets and places. Draft policies and proposals relating to woodland expansion and green infrastructure can also act to improve the setting of historic assets. The potential for negative effects was also identified, including from some national development proposals.
- 4.1.8 **Landscape and Geodiversity:** The Environmental Report identified the potential for some proposed national developments and draft policies to result in negative effects on landscapes. Initiatives such as the Central Scotland Green Network and national walking and cycling routes provide opportunities to protect and enhance townscapes and landscapes and to increase experience and enjoyment of these. Draft policies which aim to increase woodland and forestry were identified as having the potential to improve landscape character, depending on the scale and nature of change. It was noted that support for peatland protection and restoration could also benefit some iconic and culturally significant landscapes.
- 4.1.9 **Material Assets:** The focus on an infrastructure first approach within the draft NPF4 was identified as having potential to ensure that places function effectively and development improves, rather than detracts from quality of life. It was noted that promoting greater coordination of infrastructure works and planning, at both the regional and local scales, can minimise the potential for negative indirect and cumulative effects, for example through reduced disturbance during construction stages and through reduced fragmentation of green infrastructure and nature networks. An increase in development, for example housing or renewable energy, could lead to increased pressures on existing land uses through increased competition between land uses and with other forms of development.
- 4.1.10 **Population and Human Health:** The draft policies and proposals were identified as having potential to give rise to significant benefits for population and human health. Health and wellbeing benefits may arise where policies and certain national developments lead to more people walking, wheeling and cycling. Positive impacts could also arise from improved sense of place, including benefits for communities. These can be maximised where a focus is given to areas currently experiencing levels of disadvantage.
- 4.1.11 Early and emerging findings from the **Habitats Regulations Appraisal** concluded that, subject to detailed design and the implementation of avoidance and mitigation measures, including further study and assessment where necessary, projects brought forward under each proposed National Development could be delivered without adverse effect on the integrity of any European site, either alone or in-combination with other currently known plans or projects, with the exception of specific classes of development relating to Scapa Flow and Dundee Waterfront. Subsequent changes made

to address these issues are set out in Section 6 – ‘Reasons for selecting National Planning Framework 4 as adopted’.

Assessment Recommendations

- 4.1.12 The Environmental Report identified opportunities for potential positive effects to be enhanced, and for negative effects to be mitigated, as policies and proposals are applied through the planning system. In general terms, development has the potential for largely localised adverse environmental effects on each of the SEA topic areas. Effects are likely to be influenced by the scale and nature of development, and the sensitivity of the receiving environment. Many of the planning policies in the NPF4 as adopted seek to mitigate such effects through the application of detailed criteria to be applied at planning application stage.
- 4.1.13 The Environmental Report set out a range of proposed mitigations relevant to the Spatial Strategy, including:
- Effects on biodiversity should be minimised through siting and design, and enhancement measures applied in keeping with national policy. Policy 3 of the NPF4 as adopted sets out that development proposals will contribute to the enhancement of biodiversity, and stipulates careful planning and design as a way to minimise adverse impacts.
 - Focus should be given to designing buildings, infrastructure and spaces which are adaptable to climate change. ‘Adaptable’ is one of the ‘Six Qualities of Successful Places’ set out in the NPF4 as adopted.
 - Opportunities should be sought to maintain, restore and repurpose historic assets to support sustainable placemaking. This closely aligns with the policy intent of Policy 7 (Historic assets and places) of the NPF4 as adopted.
 - Development proposals should be designed to a high quality so that the scale and nature of the development contributes positively to the character and sense of place of the area. The NPF4 as adopted contains provisions for protecting character and sense of place including through Policies 14 (Design, quality and place), 16 (Quality homes), 17 (Rural homes), 20 (Blue and green infrastructure), and 29 (Rural development).
- 4.1.14 Also identified in the Environmental Report were opportunities for positive effects to be maximised, particularly where a focus is given at planning and consenting stages to opportunities for multiple benefits to arise. For example, through the role of natural solutions in flood risk management and support for a transition towards net-zero which leads to benefits not only for climate mitigation and adaptation, but also for biodiversity.

- 4.1.15 Where policies support reduced pressure on, and improved sustainability of, natural and built assets, the environmental assessment anticipated positive impacts arising for climatic factors, material assets and population and human health, particularly where this could lead to wider environmental benefits such as improved ecosystem health and increased resilience to the impacts of climate change. Furthermore, the potential for wider benefits was also identified where a focus is given to improved placemaking, including through the support for sustainable modes of travel and improved access to goods and services and high quality open spaces. NPF4 includes 6 overarching spatial principles which have been further strengthened to support the planning and delivery of sustainable, liveable and productive places. NPF4 as adopted includes a new table on page five setting out how the spatial principles fit into the overall framework.
- 4.1.16 Table 7.1 of the Environmental Report²⁴ set out the recommendations identified for individual proposed national developments which will be relevant where detailed project proposals are brought forward through the planning application process. NPF4 as adopted is clear the National Developments are intended to be examples of the Place Principle and placemaking approaches. They should be delivered in a way which helps to apply the principles, opportunities, challenges and policy identified in NPF4 in the round. Their contribution to addressing the global climate emergency and nature crisis, community wealth building and just transition will be of particular importance.

4.2. Society and Equalities assessments

Equalities Impact Assessment

- 4.2.1 The EQIA has supported the development of NPF4. The Scottish Government 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.
- 4.2.2 The EQIA helped highlight potential issues which may impact disproportionately on those with particular protected characteristics.

²⁴ [Scotland 2045: fourth National Planning Framework - draft: integrated impact assessment - environmental report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft-integrated-impact-assessment-environmental-report/pages/24.aspx)

- 4.2.3 **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, levels of perceived influence over local decision making have been consistently low over recent years, and across all subgroups of the population. The Scottish Government is committed to providing guidance on effective community engagement in local development plans.
- 4.2.4 **Housing and accommodation:** Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people, is one of six statutory outcomes for the NPF.
- 4.2.5 Housing and accommodation needs have particularly been raised under the age, disability and race characteristics but are important across a range of societal subgroups.
- 4.2.6 NPF4 as adopted seeks to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.
- 4.2.7 Policy 16 (Quality Homes) will support proposals for new homes that improve affordability and choice. This could include: adaptable and wheelchair accessible homes; 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); and homes for older people.
- 4.2.8 We know that many Gypsy/Travellers prefer to live on private sites, which can help support 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.
- 4.2.9 NPF4 includes a 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.
- 4.2.10 **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 but there is also evidence relating to the LGBTQ+ community.
- 4.2.11 Consultation responses suggested that people were supportive of the concept of local living and 20 minute neighbourhoods but had concerns around how the policy would be implemented. The revised draft NPF4 was amended to reflect a more flexible approach to this in rural areas through wider emphasis on 'local liveability'. The Government is committed to providing further guidance on local living and 20 minute neighbourhoods. Local living can provide an opportunity for places to be shaped to enable people to meet the majority of their daily needs within a reasonable distance

of their home, preferably through walking, wheeling and cycling or using sustainable transport. Local input will be vital in shaping what this looks like, particularly in rural areas. This should lead to the reduction of barriers to people's access to equal opportunities in the built environment, and to economic, green and open space and play opportunities.

- 4.2.12 **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.
- 4.2.13 Evidence suggests that being older or disabled, living in a deprived area or living in social housing are risk factors for exclusion from access to digital services. NPF4 as adopted supports support the roll-out of digital infrastructure across Scotland, to deliver appropriate, universal and future proofed digital infrastructure across the country so that local living is supported and the need to travel is reduced.
- 4.2.14 Transport is a key policy area for NPF4. NPF4 as adopted will support developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably. There will be benefits for people of all ages arising from an increase in local living and the creation of walkable, liveable and thriving places. The aim is to 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.
- 4.2.15 **Health and Wellbeing:** Improving the health and wellbeing of the people of Scotland is one of the six statutory outcomes for the NPF. Evidence suggests that 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.
- 4.2.16 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.
- 4.2.17 Places are important for physical and mental health and overall wellbeing. NPF4 as adopted supports active travel and opportunities for play and recreation. Cognisance of locations of concern for suicide is included in addition to support for green infrastructure and health and social care services and infrastructure.
- 4.2.18 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. NPF4 as adopted prioritises the use of brownfield, vacant and derelict land and properties, including supporting appropriate temporary uses where proposals for permanent development are unlikely to be imminent.

Child Rights and Wellbeing Impact Assessment

4.2.19 The Scottish Government found that the proposals do not impinge negatively upon articles of the United Nations Convention on the Rights of the Child (UNCRC) or the indicators of wellbeing and that it was considered that there were no issues that will impact negatively upon children and young people. The articles of the UNCRC which were considered to be particularly relevant to NPF4 were: Article 12, Article 24, Article 27 (1-3), and Article 31²⁵.

4.2.20 Policy interventions identified through the CRWIA include:

- Updated policy on design, quality and place, requiring plans and proposals to reflect the six qualities of successful places. The NPF4 as adopted ensures this is the case through Policy 14 (Design, quality and place).
- Reference made to the UN Convention of the Rights of the Child such that young people must be encouraged to play an active role in the planning system. The cross-cutting outcome 'A Fair and Inclusive Planning System' within the NPF4 as adopted incorporates the UNCRC into its ambition.
- Policies on blue and green infrastructure, play, recreation and sport require an understanding of needs and assets and seek opportunities for enhancement. Policy 21 (Play, recreation and sport) of the NPF4 as adopted protects against loss of children's outdoor play provision and seeks to design-in new opportunities for play in the natural and built environment.
- A new policy on health and safety which aims to improve health and reduce health inequalities. The NPF4 as adopted has a specific Health and safety policy (Policy 23).

Fairer Scotland Duty Assessment

4.2.21 The updated evidence base, findings, and decision of the Fairer Scotland Duty Assessment can be found in full in Appendix A.

²⁵ [Appendix B. Child Rights and Wellbeing Impact Assessment - Scotland 2045: fourth National Planning Framework - draft: society and equalities impact assessment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-4/draft-society-and-equalities-impact-assessment/pages/100.aspx)

Island Communities Impact Assessment

- 4.2.22 A range of potential issues for islands communities relevant to the NPF4 were identified, along with recommendations for possible mitigation. The following paragraphs set out how these recommendations have been incorporated into the NPF4 as adopted.
- 4.2.23 **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 the 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. Sustainable and fair access to affordable healthier food will support future resilience and broader objectives including reduced child poverty and improved health outcomes.
- 4.2.24 Policy 15 (Local Living and 20 minute neighbourhoods) of the NPF4 as adopted outlines an approach to 20 minute neighbourhoods within settlements which considers local context and settlement patterns, as well as reflecting the particular characteristics of each place. Policy 17 (Rural Homes) and Policy 29 (Rural Development) outline an approach to rural areas, which includes our island communities, that requires development to reflect the particular needs and characteristics of the area while ensuring natural and cultural assets are safeguarded and enhanced. Both policies as adopted also demonstrate flexibility towards our most remote places to ensure that development can help sustain and grow fragile communities.
- 4.2.25 **Employment, training and higher education opportunities:** 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.
- 4.2.26 Examples where opportunities are supported by the NPF4 as adopted include the National Development 'Energy Innovation Development on the Islands' which recognises a number of broad locations where diversification to renewable energy industries can support the potential of the Islands and the industries.
- 4.2.27 **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. 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.

- 4.2.28 The regional spatial priorities for the North and West Coast and Islands as set out in the NPF4 as adopted seek to ensure a more resilient future for island communities, including through decarbonising transport and reducing fuel poverty.
- 4.2.29 **A variety of housing types, sizes and tenures to meet people's needs and a lack of affordable housing:** Scotland's National Islands Plan 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.
- 4.2.30 The NPF4 as adopted supports the refurbishment of existing building stock and the delivery of energy efficient new homes through policies 16 (Quality homes) and 17 (Rural homes).
- 4.2.31 **Speed and reliability of internet connections:** Improved digital connectivity is a priority to sustain current businesses and create 'smart' communities. Investment in ultrafast broadband will ensure every property is connected and 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.
- 4.2.32 National Development 12 'Digital Fibre Network' within the NPF4 as adopted supports the continued roll-out of world-class broadband, prioritising those areas with weaker networks as part of the Reaching 100% (R100) programme and Project Gigabit, including urban, island specific and rural enhancements.
- 4.2.33 **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 taking 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.
- 4.2.34 The introduction of Local Place Plans (LPPs) should support island communities in developing their aspirations. LPPs must have due regard to NPF4 as well as Local Development Plans which cover a similar area.

4.2.35 **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 natural assets, heritage and culture to support better quality and more stable jobs in the sector whilst providing a positive experience for visitors and residents. Planning can help to ensure that the Rural Tourism Infrastructure Fund is targeted at places where the pressure is most significant. 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.

The NPF4 as adopted supports development proposals for new or extended tourist facilities or accommodation, including caravan and camping sites, in locations identified in the Local Development Plan (LDP) (Policy 30). The same policy also ensures compatibility with the surrounding area in terms of the nature and scale of the activity and that impacts, e.g. from increased visitor numbers, are taken into account.

4.3. Business and Regulatory Impact Assessment

Assessment Findings

4.3.1 The proposals set out in the draft NPF4 were considered necessary to ensure that the planning system more effectively contributes to key societal challenges, including the climate emergency and nature crisis. These priorities represent an update from previous policies and, in places, are a significant shift from previous practice. It was identified that NPF4 was likely to impact on all business sectors across Scotland, particularly those who engage with the planning system through the submission of planning applications. The initial high-level assessment suggested the following effects on business were likely:

- The national spatial strategy sets out a high level vision of how Scotland should develop to 2045. The impact of the strategy on individual businesses is likely to arise through the identification of national developments and development management policies that are being put in place to support the spatial strategy;
- national development status will give greater certainty to developers because it establishes the need for the development, although additional costs may be associated with progressing proposals through the planning system;
- the introduction of national planning policies which form part of the development plan will provide greater certainty to developers and considerably reduce the number of occasions where they will need to engage with the planning system on the development of policies that affect their businesses;

- some changes to development management policies will impact on businesses (both positively and negatively).

4.3.2 It was considered that national planning policies which will apply across Scotland should also free up resources for local authorities to bring forward local development plans that primarily focus on the spatial issues that are specific to their areas. However, some respondents to the partial BRIA expressed doubt that cost savings will outweigh need in local authorities for resource and skills to deal with new work areas

Assessment Recommendations

4.3.3 It was noted that work being taken forward by the High Level Group on Planning Performance²⁶ will be central to informing a cross sectoral approach to skills and resourcing following the adoption of NPF4. The delivery programme published alongside the NPF4 as adopted aims to secure a cross-government approach to the delivery of NPF4. Along with other key stakeholders including Partners in Planning²⁷ we will develop a skills strategy which will identify the specialist skills required to address the requirements of National Planning Framework 4, and the wider skills required to ensure we have planners with the expertise to deliver on our ambitions for Scotland.

4.3.4 The final BRIA considered that overall, costs are outweighed by the strong justification for proceeding with the intended approach, in particular the contributions to national outcomes.

²⁶ [Planning performance: high level group - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/plan-perf-high-level-group/pages/12.aspx)

²⁷ [Home | Partners in Planning](https://www.gov.scot/publications/partners-in-planning/pages/1.aspx)

5. How the opinions expressed have been taken into account

5.1. Consultation and Engagement

- 5.1.1 Three rounds of formal engagement on NPF4 were undertaken from 2020 onwards: the Call for Ideas (2020)²⁸, the Position Statement (2020)²⁹ and the Draft NPF4³⁰ (2021). The 'Call for Ideas' sought early views on NPF4 and ran from January to April 2020. Stakeholders were invited to consider Scotland in 2045 and reflect on planning policy changes and National Developments needed to get us there. The Call for Ideas was backed up with extensive stakeholder engagement and a roadshow around Scotland to hear what people had to say.
- 5.1.2 The November 2020 Position Statement set out an overview of likely key challenges, opportunities and potential policy changes, having reflected on the wealth of information and views received. It also reflected on the impacts of COVID-19 and what NPF4 can do to help societal and economic recovery. The consultation on the Position Statement received over 250 responses, with a broad support for the general direction of NPF4, the ambition on climate change, the focus on the place principle and the focus on 4 key outcomes.
- 5.1.3 The draft NPF4 was issued for consultation alongside the Integrated Impact Assessment on the 10 November 2021. Views were invited on 70 questions of which five related to the Environmental Report, six to the Society and Equalities Assessments, and one to the partial BRIA. Upon the closing of the consultation period on the 31 March 2022, 539 responses from organisations and 222 responses from individuals were received. Respondents from organisations included membership representative bodies, businesses, campaign groups, charities, research institutions and public sector bodies, including the SEA Consultation Authorities.
- 5.1.4 Further to the consultation outlined above, the draft NPF4 was subject to parliamentary scrutiny for a period of 120 days. A broad overview of committee consideration and parliamentary timeline for this period is given in the NPF4 explanatory report³¹.

²⁸ [Call for Ideas | Transforming Planning](#)

²⁹ [Fourth National Planning Framework: position statement - gov.scot \(www.gov.scot\)](#)

³⁰ [Scotland 2045 - fourth National Planning Framework - draft: consultation - gov.scot \(www.gov.scot\)](#)

³¹ [National Planning Framework 4: explanatory report - gov.scot \(www.gov.scot\)](#)

5.2. Comments on the Draft National Planning Framework 4

- 5.2.1 A detailed independent analysis of the responses to the draft NPF4 consultation was published on 8 November 2022³². Set out below are the main themes which emerged, together with the Scottish Government response. Further detail is contained in the Explanatory Report³³ published alongside the Revised Draft NPF4 laid in the Scottish Parliament for approval on 8 November 2022.
- 5.2.2 **Strategic hierarchy and relationships:** A number of respondents commented on the inter-relationships between NPF4 and a range of other national, regional or local strategies or plans. A general observation was that NPF4 misses an opportunity to clearly state where it sits within the overall context of other Scottish Government plans and strategies. Being clear about the relationship between NPF4 and these related strategies was seen as offering the best chance of success, with the quality of alignment seen as key. It was suggested that this is especially important when it comes to the successful delivery of those individual planning policies which cross over into other areas and where strategies have complementary aims.
- 5.2.3 SG response: The narrative for each theme (Part 1) now covers links and relationships with other national strategies and policies. A new schematic (Table 1 in NPF4 as adopted) was added to show key policy links. A new 'How to Use this Document' Annex covers the roles of NPF and other plans in the planning system (including Regional Spatial Strategies, Local Development Plans and Local Place Plans) and also references Regional Transport Strategies.
- 5.2.4 **Structure of NPF4:** Respondents commented on the relationship between the different parts of the draft document, as well as its overall structure. Suggested changes or additions to the document included: setting out the interconnections across the national spatial strategy, National Developments and policy handbook; the use of schematics that illustrate how the different elements of NPF4 come together at different scales through a place-lens; and adding a statement in the early part of the document on how it complies with the various statutory requirements of the Town and Country Planning (Scotland) Act 1997 (as amended), and other related legislation.
- 5.2.5 SG response: The document has been restructured under 3 themes rather than 4, with Distinctive Places being removed (and policies under this heading redistributed), to focus on the three pillars of sustainable development: environment, people and economy. The narratives for each theme have been strengthened and additional detail on how the strategy will meet the statutory outcomes has been added. The Regional Spatial Strategies have been sharpened, more clearly focusing on the main issue for

³² [National Planning Framework 4 - draft: consultation analysis - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-4-draft-consultation-analysis/pages/2.aspx)

³³ [National Planning Framework 4: explanatory report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-4-explanatory-report/pages/2.aspx)

each area, including the main priorities for action and the relevant National Developments. A new schematic (Table 1 in NPF4 as adopted) was added to show how the spatial principles, national developments, policies and sustainable development goals and national outcomes connect.

- 5.2.6 **Language:** A frequently-raised issue related to the wording used across NPF4, including the frequent use of 'should'. It was suggested that this is ambiguous, and it is not clear where this means that the relevant policy must be complied with. Another frequent concern was around references to development being 'supported' or 'not supported', and there was a question as to whether this means that development is to be approved or not to be approved.
- 5.2.7 SG response: The wording, and use of language has been refined throughout, particularly within the policies, to provide greater clarity and consistency. Annex A – 'How to Use this Document' confirms that the policies are a package and must be read as a whole.
- 5.2.8 **Part 1 – Spatial Strategy:** A number of the comments addressed the deliverability of Liveable Places, with observations including that there is very little detail on how transformative social and economic change is going to be delivered. Respondents also commented on the importance of communities being empowered to be the key drivers of this change. There was support for the focus on the just transition to net zero and a nature positive economy. It was noted that the move to a greener economy could provide opportunities for business development, job creation and investment in communities, through community wealth building. In relation to rural, highland and islands settings, it was suggested that their distinctive socio-economic and market characteristics require a flexible, responsive approach to development, taking account of local context and need. It was noted that the concept of Distinctive places is already well embedded in the planning system and there were concerns around how high level strategy translates into the individual policies required for delivery. There was support for a stronger commitment to placemaking.
- 5.2.9 SG response: The spatial strategy section has been re-presented. We have moved from 4 themes to 3 to better reflect the three pillars of sustainable development. The narrative to each theme in Part 1 has been updated and wording sharpened. Clear linkages to other relevant policies and strategies have been added. Priorities for each theme along with National Developments that will help to deliver the theme have been more clearly presented. Text outlining cross-cutting outcomes and policy links has also been added.
- 5.2.10 **Part 2 – National Developments:** A number of issues were raised in relation to the implications of National Development status, including suggestions that it should carry a presumption in favour of planning consent. It was also suggested that guidance will be needed with respect to how to balance the competing priorities of different National Developments, and that it would be helpful to explain how National Developments might interact with Regional Spatial Strategies and the NPF4 action areas. In relation to the selection of National Developments, it was suggested it would be helpful to

set out the rationale for selecting those chosen and why some are conceptual, and others are existing proposals.

- 5.2.11 SG response: The main document now includes a summary of each development, whilst the technical descriptions have been moved to Annex B. We have also made connections to the National Developments in each of the action areas. These structural changes also reflect Committee comments received. The preamble to the statements of need has been revised and moved to Annex B with some elements taken into the Delivery Programme. An additional paragraph has been added to the preamble at Annex B to take account of impact assessment findings. Each national development has been updated, with many of the changes being relatively minor. However, in response to both consultation views and the associated impact assessments, more substantive changes have been made to the Islands Hub for Net Zero, Dundee Waterfront, the Circular Economy Materials Management Facilities and Hunterston Strategic Asset. Some respondents also provided a range of national development suggestions in addition to those proposed in the draft. No further National Developments were taken forward on the basis that the additional proposals had previously been considered following the earlier Call for Ideas; are more of a policy or strategy than development; are likely to be of sub-national impact in spatial planning terms; and/or already have consents in place or construction is advanced.
- 5.2.12 **Part 3 – National Planning Policy:** Across the policies, there were frequent requests for greater clarity, including through the inclusion of definitions of key terms and/or by providing further information or guidance. There were also a number of references to policies being strengthened, including by requiring, rather than permitting, their application. This latter point was often connected to the more frequent use of ‘must’, rather than ‘should’. There were a number of comments about how the application of the Universal Policies in the Draft NPF4 related to the application of other NPF4 policies, and in particular whether the Universal Policies were expected to take precedence.
- 5.2.13 SG response: Universal policies have been removed. Each policy has been set out to ensure that the policy intent and outcome are clear. Instructions for Local Development Plans have been separated out to remove confusion with development management policies and there is tightened wording throughout. We have also added links to other key policy connections and identified which spatial principles will be delivered through each policy. Annex A - How to Use this Document confirms that the policies are a package and must be read as a whole.
- 5.2.14 **Part 4 – Delivering Our Spatial Strategy:** A number of respondents commented that a delivery plan would have been helpful to support the Draft NPF4. The importance of the delivery strategy was highlighted, including to provide confidence to all sectors involved in the built environment. There was broad agreement that monitoring will be an essential part of the NPF process, and also that it will be a significant and challenging undertaking. In terms of overall responsibilities, it was suggested that monitoring of NPF4

should be led and undertaken by the Scottish Government as the coordinating authority.

- 5.2.15 SG response: A delivery programme has been published alongside the Revised Draft, which sets out how the priorities in NPF4 align with wider investment programmes. Section 5 covers monitoring and evaluation. The Scottish Government is committed to updating the delivery programme within six months of adoption, and annually thereafter.

5.3. Comments on the Environmental Report

- 5.3.1 The following five questions were included in the consultation to help frame responses on the Environmental Report:

- What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?
- What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report?
- What are your views on the potential health effects of the proposed national developments as set out in the environmental report?
- What are your views on the assessment of alternatives as set out in the environmental report?
- What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

- 5.3.2 The views and comments received have been summarised below.

- 5.3.3 **Accuracy and scope of environmental baseline:** Positive comments about the accuracy and scope of the baseline set out included that it is comprehensive, appropriate and proportionate to enable the impacts of implementing NPF4 to be suitably measured through monitoring arrangements. Elements which respondents particularly welcomed included the extensive use of maps, the identification of key pressures and trends affecting the baseline, and the recognition of the undesignated historic environment. However, there were also some broader concerns. These included that there are many caveats, the baseline is not far-reaching enough, and that the lack of data for the last 3-4 years, especially in the water and pollution context, is problematic. There was also a concern that the baseline appears to be centred on analysis and statistics principally provided by NatureScot. There was a call for an independent scientific review of the accuracy and scope of the environmental baseline, to ensure that this is the correct starting point. There was also a view that the environmental baseline is very optimistic, including in relation to biodiversity losses, the condition of our soils, and the state of our freshwaters and some marine habitats.

- 5.3.4 **Predicted environmental effects:** Some respondents either noted that they agreed, or agreed in principle, with the predicted effects. However, it was also suggested by some respondents that the assessment is inadequate, or optimistic. It was also described as hard to validate and there was call for further detail on how biodiversity, climate and environmental targets are decided upon, and are to be measured and enforced. It was also suggested that the significance of NPF4 in meeting the requirements of relevant environmental legislation is not made clear in the SEA. An example given was that in relation to National Development (ND) 7 (Island Hub for Net Zero), it is noted that consideration needs to be given to the implications of European sites.
- 5.3.5 SG response: Early findings from the IIA helped to inform the preparation of the revised NPF4, including the National Developments. Early and emerging findings from the Habitats Regulations Appraisal (HRA) in particular led to direct amendments to Islands Hub for Net Zero National Development, and Dundee Waterfront, including the removal of [relevant classes of development](#) as the emerging appropriate assessment identified (on the basis of information available at this stage in the planning process) that it was not possible to conclude that those particular classes could be progressed without adversely affecting European sites.
- 5.3.6 **Potential health effects of proposed national developments:** Broad agreement with the potential health effects as set out, but also views that positive impacts do rest on the positive environmental impacts identified being achieved. Other general issues raised included that prioritising biodiversity and nature recovery through planning policy has immense potential for restoring human health and wellbeing. An alternative view was that Scottish Government energy policies are impacting negatively on communities, land and seas. There was specific reference to families living near windfarms.
- 5.3.7 SG response: Policy 11 (Energy) ensures that potential impacts on communities, nature and other receptors remain an important consideration in the decision-making process for renewable energy proposals. There is also a specific criterion within the policy which requires noise and flicker impacts are addressed through project design and mitigation.
- 5.3.8 **Assessment of alternatives:** It was considered that the assessment was potentially very useful, or that respondents agreed with it in principle. Alternatively, it was suggested by some that not enough detail had been provided, that the assessment was inadequate, or was focused on the interests of the Central Belt. There was also a view that reasonable alternatives should have been identified, particularly where adverse environmental effects are likely. For example, given that the discussion of alternatives to Policy 19 (Green energy) recognises that it is difficult to predict how impacts may differ between the proposed policy and current Scottish Planning Policy (SPP), and that keeping the existing SPP approach would mean a greater level of protection may be afforded to sites and species, it was suggested that the existing approach should be retained. The assessment of the alternative national developments was welcomed, although it was assumed that further assessment will consider the

environmental impact of proposals in further detail. A number of specific alternatives that respondents wanted to see included, or given greater coverage, were also put forward.

- 5.3.9 SG response: Our assessment findings and the comments received have been taken into account in finalising NPF4. Where suggestions were received for national developments which were not considered further for national development status, these informed development of the wider strategy as appropriate. Further information is available in the National Developments Report of Assessment³⁴.
- 5.3.10 **Mitigation, enhancement and monitoring:** While some respondents noted their agreement with the proposals for mitigation, enhancement and monitoring, others saw them as inadequate, suggested they were unenforceable, or suggested that insufficient information has been provided. Other comments included concerns that NPF4 will not protect and enhance biodiversity to the extent needed to deliver transformational change without a clear mechanism for delivering biodiversity enhancement, and clear wording to ensure the mitigation hierarchy is followed. An associated point was that NPF4 will be influential in determining the focus and content of LDPs, as well as determining development proposals. Given this, it was described as imperative that the findings of the SEA lead to actions which are embedded into NPF4, and that the SEA is not used as a barrier to implementation but as an opportunity to incorporate strong environmental principles throughout NPF4. With specific reference to mitigation, comments included that it should not be used as an excuse for allowing otherwise unacceptable environmental degradation or damage. In relation to monitoring, it was suggested that the Environmental Report does not appear to set out any detailed monitoring arrangements, making it difficult to comment on the suitability of the monitoring programme.
- 5.3.11 SG response: Language in NPF4 policy 3 (biodiversity) has been tightened to reference the mitigation hierarchy. The NatureScot guidance document, 'Developing With Nature'³⁵ supports finalised NPF4 policy on Biodiversity in relation to local development proposals. We have also commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland.

5.4. Comments on the Society and Equalities Impact Assessment

- 5.4.1 The six questions used in the consultation to help frame responses on the Society and Equalities Impact Assessment were:

³⁴ [Scotland 2045 - fourth National Planning Framework - draft - national developments: assessment report - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft-national-developments-assessment-report/gov.scot/www.gov.scot/)

³⁵ [Developing with Nature guidance | NatureScot](https://www.naturescot.gov.uk/developing-with-nature-guidance/)

- What are your views on the evidence and information to inform the society and equalities impact assessment?
- Do you have any comments on the findings of the equalities impact assessment?
- Do you have any comments on the findings of the children’s rights and wellbeing impact assessment?
- Do you have any comments on the Fairer Scotland duty and the draft NPF4?
- Do you have any comments on the consideration of human rights and the draft NPF4?
- Do you have any comments on the islands impact assessment?

5.4.2 The following sections summarise the responses received to each of the above questions.

5.4.3 **Evidence and information:** General comments included that the evidence and information appear reasonable, or that the breadth and scope of the baseline information is good. However, there was also a view that the evidence and information, or the EQIA process, is not objective. It was also suggested that the recommendations within the EQIA could be more strongly reflected in NPF4’s policies, for example, in relation to housing need, equality and human rights. In terms of the assessment process, comments included that the non-technical summary should be a living document, especially given the long-term nature of NPF4. It was suggested that the Equality and Human Rights Commission’s measurement framework for equality and human rights may assist both government and local authorities with the collection of equality data. There was also a recommendation that Equality, Diversity and Inclusion (EDI) benchmarks, measures and reporting be carried out in order to track and monitor progress on EDI on an annual basis, as well as society and equalities impact assessments. In relation to the evidence used, it was noted that the EQIA references a broad evidence base and cites various reports that are not referred to in the draft NPF4. It was described as heartening to see that such a body of evidence had been considered, but it was noted that the confinement of this evidence base to the EQIA requires that this be read in order for the policies in NPF4 to be understood in their entirety. Finally, it was noted that while the EQIA cites a comprehensive range of evidence to show how planning may impact on protected groups, this is presented without criticism or comment, and it is therefore left up to the reader to interpret how to use this information to deliver equal outcomes for all groups.

- 5.4.4 SG response: These comments have been noted. Further information on NPF4 monitoring is set out in section 7 below, and in the NPF4 Delivery Programme v1³⁶ available online.
- 5.4.5 **EQIA Findings:** General comments included that while it is welcome that ‘improving equality and eliminating discrimination’ is a stand-alone outcome of NPF4, there is also a need to apply an equality lens/priority to each of the other required high-level outcomes and the ensuing strategies, developments and policies. It was suggested more could be done to emphasise the cross-cutting nature of improving equality and eliminating discrimination. For example, it was suggested that most, if not all, of the actions and policies identified in the draft NPF4 can and should identify how they will support this high-level outcome. The concern was, if not considered from the outset, there is a risk that inequalities will be overlooked, reinforced, perpetuated or exacerbated at implementation stage. It was suggested that in order to move beyond ‘suggestions’ and ‘potential’, there needs to be clear evidence and strategies throughout NPF4 on how this will be achieved in practice.
- 5.4.6 SG response: The NPF4 was revised to include a cross-cutting outcome on ‘A fair and inclusive planning system’ which sets out at a high level how the policies and engagement opportunities interact to support development that helps eliminate discrimination and promote equality.
- 5.4.7 **CRWIA Findings:** General comments included that the involvement of children and young people in the preparation of NPF4 is welcome. There was a concern that the conclusions drawn in the Children’s Rights and Wellbeing Impact Assessment are simplistic, and that children’s human rights and wellbeing would be better protected by much more explicit mention and signposting to other relevant policy objectives, such as the SHANAARI principles (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible and Included) and Getting it right for every child (GIRFEC). Other comments included that while the Impact Assessment includes a good range of evidence, it misses out a few key pieces of place-based research of relevance such as The Children and Young People’s Commissioner Scotland report, Scot Youth and COVID 2. In terms of general issues or themes, it was suggested that the planning process can make a critical difference to tackling poverty and noted that tackling child poverty is a priority for the Scottish Government. Associated suggestions included that a greater focus on child poverty would ensure that child poverty is given suitable priority within planning decisions; it was noted that child poverty is only mentioned once within the draft NPF4.
- 5.4.8 SG response: NPF4 as adopted recognises the importance of place and continued investment in regeneration, targeted to areas where the need is

³⁶ [national-planning-framework-4-delivery-programme-for-publication-2-november-2022.pdf](#)
([transformingplanning.scot](#))

greatest. The spatial strategy as a whole is clear that our future development must support a just transition, and it highlights opportunities for development and regeneration that are designed to tackle social, economic and health inequalities. Policy 16 (Quality homes) in particular recognises the value of more energy efficient, net zero emissions homes, supporting a greener, fairer and more inclusive wellbeing economy and community wealth building, tackling both fuel and child poverty. Where specific suggestions have been made regarding evidence and data, these are noted and will help to inform future assessments.

- 5.4.9 **Fairer Scotland duty:** General comments included that it is good to see the Fairer Scotland duty reflected. Particular aspects of the Impact Assessment that were welcomed included the recognition that income is a strong determinant for people's ability to respond to, and recover from, climate change impacts and that our future places and spaces need to contribute to improving equality and eliminating discrimination. It was also noted that the assessment has identified a number of key policies which will help tackle inequalities and poverty, including NPF4's spatial strategy, thematic policies and proposed national developments. However, there was also a concern that the draft NPF4 had an urban bias, or specifically is biased towards the Lothians. There was an associated need for equality of access to services across Scotland, including through necessary and timely investment, for example in digital and transport infrastructure.
- 5.4.10 SG response: Care has been taken to ensure policies reflect the specific needs and constraints of rural areas. Policy 13 for example ensures that in assessing the transport impacts of development, the area's needs and characteristics are taken into account. Policy 15 aims to promote local living in broad terms, including through 20 minute neighbourhoods, recognising the importance of varying settlements patterns and the particular characteristics and challenges of different areas in applying these principles in practice. Policy 24 will support the delivery of digital infrastructure to support investment and population growth in rural areas. NPF4 recognises that there remain issues of digital connectivity and includes a Digital Fibre Network as a national development. It aims to enhance the connectivity of communities and help to facilitate more sustainable ways of living, including in rural and island communities. Policy 28 also recognises the importance of retail facilities for rural communities and economies. Policy 29 encourages rural development that is sustainable and contributes to the viability and diversity of rural communities.
- 5.4.11 **Human rights:** A number of respondents expressed disappointment that there is not currently a specific Human Rights Impact Assessment. Further connected comments included that housing is a human right, but there is no reference to this in NPF4, nor any of the supporting documents. It was suggested that it is vital that Articles 17 and 25 of the Universal Declaration of Human Rights be afforded weight in the preparation of NPF4.
- 5.4.12 SG response: Human rights were embedded throughout the policy making process and are recognised in the cross-cutting outcome 'A Fair and Inclusive Planning System'. The Integrated Impact Assessment recognises

that everyone in Scotland has the right to an adequate standard of living, including both adequate housing and adequate food (Article 25).

- 5.4.13 **Islands Impact Assessment:** General comments included a view that no consideration had been given to the island communities affected by development policies. There was specific reference to the treatment of the islanders of Orkney and Shetland, and it was suggested that there needs to be more proactive engagement with island communities about planning. Respondents also highlighted a range of issues that affect island communities, including housing, childcare provision, and lack of stable employment. Although an assessment dedicated to island communities was welcomed, it was noted that many mainland communities experience similar issues of fragility and isolation. There was a query as to how these communities might receive the dedicated focus and actions that has been applied to island communities.
- 5.4.14 SG response: Improving community involvement in the planning system has been a key aim of planning reform from the outset. It is vital that local people have the opportunity to engage meaningfully and have a positive influence in the future planning of development in their areas. Provisions within the Planning (Scotland) Act 2019 will provide enhanced opportunities for communities and the public at large to engage in shaping the places they stay. The challenges faced by island communities are shared with much of rural Scotland, and often have similarities with other communities that suffer disadvantages, for example in accessing public services or high quality employment. However, the consequences of geography (including higher costs and environmental factors) can create particular problems for island communities and people have felt abandoned and disadvantaged by central-based governance systems. Issues which impact on all islanders to some extent, those relating to access to transport or adequate housing for example, may be acutely felt by some groups more than others and require targeted measures in order to redress the inequality experienced. The Islands Act was the first step in remedying these challenges. NPF4 recognises the role of encouraging rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area, and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

5.5. Comments on the Partial Business and Regulatory Impact Assessment

- 5.5.1 Question 70 of the consultation asked for comments on the Partial BRIA, and received 45 responses.
- 5.5.2 General observations included that there is little tangible information on costs provided. A number of respondents noted their concern that the cumulative resource burden of NPF4 on planning authorities is not recognised in the partial BRIA. The BRIA's suggestion that replacing most local policies with national planning policies will free up time and resources for local authorities to focus on spatial elements in their development plans

was questioned. There was also doubt that the introduction of a Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority will reduce the workload of local authorities.

- 5.5.3 SG response: The national planning policies that will apply across Scotland are intended to reduce the need for different policies to be put in place by individual planning authorities. This will provide greater consistency, predictability and certainty for businesses, and other stakeholders, on the issues that must be addressed by specific proposals regardless of where they are located. This should result in cost savings arising as a result of not having to engage with different local authorities on different policies and also free up resources for local authorities to bring forward development plans that primarily focus on the spatial issues within their areas. Although some consultation responses query these cost savings, we remain of the view that the new system will result in savings to authorities in this regard.
- 5.5.4 Responses to the partial BRIA highlighted that business may be impacted where NPF4 policies introduce requirements for assessments to be undertaken in new work areas. Further, there was doubt that cost savings will outweigh the need in local authorities for resource and skills to deal with new work areas. However, where additional requirements are more significant, primarily in relation to climate change related policies, additional guidance and skills development will be undertaken.

6. Reasons for selecting National Planning Framework 4 as adopted

- 6.1.1 The 2005 Act requires that the Scottish Government identifies, describes and evaluates the likely significant effects on the environment of any reasonable alternatives to the draft NPF4, taking into account its objectives and geographical scope. The extent to which alternatives could be considered reasonable was influenced by the relevant legislative requirements and takes into account existing policies and actions, the content of which has been set out elsewhere in other plans, programmes and strategies.
- 6.1.2 Preparation of NPF4 was part of a wider and ongoing programme of planning reform informed by an independent review of the planning system. It sits within the legislative framework set by the Town and Country Planning (Scotland) Act 1997, as revised and updated by the Planning (Scotland) Act 2019, which introduced new statutory provisions on the content and outcomes for the NPF. At the same time, there was a need to update NPF3 and Scottish Planning Policy to give fuller regional coverage and improve alignment with wider programmes and strategies, including on infrastructure and economic investment and responding to the twin global emergencies on climate and nature. **‘Do nothing’** was therefore not considered to be a reasonable option.
- 6.1.3 Throughout the environmental assessment of the three main components of the draft NPF4 consideration was given to potential alternative options and approaches:
- **Spatial strategy:** In advance of the new duty to produce Regional Spatial Strategies (RSS), the draft NPF4 spatial strategy was developed in collaboration with a range of partners and wider stakeholder interests, to develop thinking across regional and national spatial scales. No reasonable alternatives were identified.
 - **National developments:** 35 alternative national developments were assessed for their potential environmental effects. This was an iterative process, with the assessment findings feeding into the final decision of what was to be a proposed National Development.
 - **Planning Policy:** NPF4 should be taken as a whole, and all relevant policies should be applied to individual planning applications. Nevertheless, as part of the iterative drafting process, consideration was given as to whether any reasonable alternatives to policies might arise.
- 6.1.4 Ultimately the selection of the final suite of national developments was informed by the detailed analysis of proposals against published criteria, including environmental considerations such as climate change and impacts on natural and cultural heritage. In addition, the selected national developments were considered to be the best available means of implementing the wider aims of the spatial strategy. The SEA and HRA, and the associated consultation, provided a means of testing these proposals, to

ensure that none of the national developments would result in significant adverse effects that could not be mitigated to an acceptable level.

- 6.1.5 As previously mentioned, the HRA brought about late modifications to two of the National Developments. This was in relation to:
- The development of a deep water port in Scapa Flow, initially proposed under Energy Innovation Development on the Islands; and
 - any project brought forward under Dundee Waterfront which involved land reclamation.
- 6.1.6 For these two classes of development under Energy Innovation Development on the Islands (Originally Islands Hub for Net Zero) and Dundee Waterfront, on the basis of information available, it was not possible for the appropriate assessment to conclude that relevant projects could be progressed without adversely affecting several European sites situated around Orkney and in the Firth of Tay, respectively. These classes of development were therefore removed from their associated National Developments in the Revised Draft NPF4.
- 6.1.7 The society and equality assessments also supported the development of NPF4 as adopted. The Scottish Government has considered and embedded the three elements of the Public Sector Equality Duty: to 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 in particular has helped highlight potential issues which may impact disproportionately on those with particular protected characteristics. The EQIA makes reference to how NPF4 supports proposals for new homes that improve affordability and choice, including 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). Further local living and 20 minute neighbourhood guidance will also reflect the 7 'calls to action' as outlined in the 'Exploring Scotland's 20-minute neighbourhoods' event report³⁷.
- 6.1.8 In the final BRIA, the Scottish Government's preferred option was compared to an alternative non-regulatory approach. It was found that any alternative strategy used to deliver national policies would not have the same status and influence as NPF4 and would likely need to be brought forward in a piecemeal way as the Scottish Government seeks to ensure that the planning system is changed to deliver wider policy priorities. This could result in a confusing and weakened landscape for planning decisions which would affect the whole sector.

³⁷ [20 minute neighbourhood report 6 \(alliance-scotland.org.uk\)](https://alliance-scotland.org.uk/20-minute-neighbourhood-report-6)

7. Monitoring

- 7.1.1 Section 19 of the 2005 Environmental Assessment (Scotland) Act requires the Responsible Authority to monitor significant environmental impacts arising as a result of the implementation of a plan, programme or strategy. The purpose of any monitoring arrangement is to identify any unforeseen adverse effects at an early stage and to enable appropriate remedial action to be taken.
- 7.1.2 The first iteration of the NPF4 Delivery Programme, published November 2022, sets out our approach for implementing NPF4, including delivery mechanisms, governance, funding and monitoring. The Delivery Programme identifies a range of priority actions, delivery partners and anticipated timescales.
- 7.1.3 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. It will be important to monitor all three elements of NPF4 – the spatial strategy, national developments and national planning policy. Given the breadth of issues addressed by NPF4 and the multidisciplinary nature of delivery, it will be important to ensure that the activity required at both a national and local level is proportionate and effective. Arrangements for monitoring will also need to complement, and potentially combine, wider planning performance work including Planning Performance Frameworks and could be informed by Royal Town Planning Institute’s (RTPI) work on monitoring outcomes, as well as reflecting national outcomes set out in the National Performance Framework.

7.2. Spatial Strategy

- 7.2.1 It will be important to monitor long-term change. Given the significant lead-in time for development projects, trends may not emerge for some time. In the interest of proportionality, it is proposed that the monitoring approach will reflect and read-across to relevant data that is already gathered and reported on in relation to the National Outcomes set out in the National Performance Framework.

7.3. National Developments

- 7.3.1 The Planning, Infrastructure and Place Advisory Group will provide an influential forum for discussing and sharing good practice and issues arising from implementing National Developments. To inform this we will build and maintain consistent monitoring information for each of the National Developments over time.

7.4. National Planning Policies

- 7.4.1 At a national level monitoring will initially focus on reviewing appeal decisions and reflecting on the progress of new Local Development Plans in the system. In the interest of proportionality, we propose to monitor NPF4 policies that introduce significant change and represent the strategic aims of the document as a whole. Further detail on potential indicator policies is set out in the delivery programme³⁸.

³⁸ [national-planning-framework-4-delivery-programme-for-publication-2-november-2022.pdf \(transformingplanning.scot\)](#)

8. Appendix A – Fairer Scotland Duty Assessment Template

8.1. Template details

8.1.1 Title of policy: National Planning Framework 4

8.1.2 Lead Minister: Minister for Public Finance, Planning and Community Wealth

8.1.3 Lead official: Cara Davidson

8.1.4 Directorate: Local Government and Communities

8.1.5 Division: Planning, Architecture and Regeneration

8.1.6 Team: Planning Transformation

8.2. Stage 1 - Planning

8.2.1 NPF4 will guide the development and use of land to 2045. Forming part of the development plan, it will inform day-to-day planning decision making. It will guide local development plans, will be important for communities as they develop their Local Place Plans, and provide a framework for the development of regional spatial strategies.

8.2.2 NPF4 is linked to the outcomes of the National Performance Framework³⁹. In keeping with our national outcomes and with the United Nations (UN) Sustainable Development Goals (SDGs), NPF4 sets out the following overarching spatial principles to guide our future places:

- **Just transition.** We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.
- **Conserving and recycling assets.** We will make productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy.
- **Local living.** We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.
- **Compact urban growth.** We will limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.
- **Rebalanced development.** We will target development to create opportunities for communities and investment in areas of past decline, and manage development sustainably in areas of high demand.
- **Rural revitalisation.** We will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.

8.2.3 By applying these spatial principles, NPF4 will support the planning and delivery of: **Sustainable places**, where we reduce emissions, restore and better connect biodiversity; **liveable places**, where we can all live better, healthier lives; and **productive places**, where we have a greener, fairer and more inclusive wellbeing economy.

³⁹ [National Performance Framework | National Performance Framework](#)

8.2.4 NPF4 is required by law to contribute to 6 outcomes, including:

- 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, within the meaning of the Climate Change (Scotland) Act 2009, contained in or set by virtue of that Act; and,
- securing positive effects for biodiversity.

8.2.5 NPF4 includes planning policies on key issues supporting people's lives such as: engagement, local living, housing, spaces and places, work and inequalities, health and wellbeing and connectivity. It therefore has the potential to impact all people and businesses across Scotland.

8.2.6 Having considered that NPF4 is a strategic document, a Fairer Scotland Duty assessment was undertaken alongside the development of NPF4 and a draft written assessment published⁴⁰ to accompany the November 2021 Draft NPF4. This document sets out a final written assessment to accompany the adopted NPF4.

⁴⁰ [Integrated Impact Assessment Society and Equalities Impact Assessment \(www.gov.scot\)](https://www.gov.scot)

8.3. Stage 2 - Evidence

- 8.3.1 In January 2020 we published our NPF4 Integrated Impact Assessment Screening/ Scoping Report⁴¹ setting out an initial evidence base and inviting comments. A draft Fairer Scotland Duty assessment was published alongside the November 2021 Draft NPF4⁴² and sets out the detailed evidence base used in the assessment.
- 8.3.2 **Responses to engagement and consultation of the Draft Fairer Scotland Duty Assessment:** Particular aspects of the Impact Assessment that were welcomed included the recognition that income is a strong determinant for people's ability to respond to, and recover from, climate change impacts and that our future places and spaces need to contribute to improving equality and eliminating discrimination. It was also noted that the assessment identified a number of key policies which will help tackle inequalities and poverty, including NPF4's spatial strategy, thematic policies and proposed national developments.
- 8.3.3 There was a concern from some that the draft NPF4 had an urban bias, or specifically that it was biased towards the Lothians. It was considered that there was an associated need for equality of access to services across Scotland, including through necessary and timely investment, for example in digital and transport infrastructure. A full independent analysis of responses to the draft NPF4 consultation is available on the Scottish Government website⁴³.
- 8.3.4 **Updated evidence base reflecting the Resource Spending Review Equality and Fairer Scotland Statement:** In addition to the evidence set out in the draft assessment, the Resource Spending Review (May 2022) was accompanied by an Equalities and Fairer Scotland statement⁴⁴ setting out how the Scottish Government will address the key challenges and realise the opportunities to tackle inequality, promote human rights, and build a fairer Scotland through the Resource Spending Review. It set out nine medium term challenges and opportunities and considered the nine strategic opportunities and challenges flowing from previous Equality and Fairer Scotland Budget Statements, and explained how the Scottish Government will address these.

⁴¹ [Integrated Impact Assessment | Transforming Planning](#)

⁴² [Scotland 2045: fourth National Planning Framework - draft: society and equalities impact assessment - gov.scot \(www.gov.scot\)](#)

⁴³ [National Planning Framework 4 - draft: consultation analysis - gov.scot \(www.gov.scot\)](#)

⁴⁴ [Resource Spending Review: Equality and Fairer Scotland Statement \(www.gov.scot\)](#)

8.4. Stage 3 – Assessment and Improvement

- 8.4.1 The purpose of this section is to set out how the policy changes in the NPF4 as adopted have the potential to impact on inequality caused by socio-economic deprivation.
- 8.4.2 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. To achieve a net zero, nature-positive Scotland, NPF4 rebalances our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions.
- 8.4.3 For people on low incomes, this is a strong determinant for people’s ability to respond to and recover from climate change impacts.
- 8.4.4 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. Connectivity is also an important factor (both digital and transport) as well as access to green space, pollution effects, housing quality, fuel poverty and community participation. The planning system should support decisions that improve equality and help to eliminate discrimination, with a fairer, more inclusive and equalities based approach. NPF4 as adopted has the potential to impact upon people across the whole of Scotland irrespective of their socio-economic status. NPF4 can help tackle inequalities in this broadest sense by:
- 8.4.5 **Actively planning future development in a way that helps us to reduce emissions and minimises the need to travel by unsustainable modes:** NPF4 supports developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduces the need to travel unsustainably. NPF4 sets out that local development plans should aim to reduce the need to travel unsustainably by prioritising locations for future development that can be accessed by sustainable modes. Proposals to improve, enhance or provide active travel infrastructure, public transport infrastructure or multimodal hubs will be supported.
- 8.4.6 **Promoting innovative place-based solutions to reflect a new approach to localism, including 20 minute neighbourhoods:** Local living provides the opportunity to reduce the need to travel unsustainably, promote and facilitate walking, wheeling and cycling, improve access to services, decentralise energy networks and build local circular economies. As an integral part of this, cleaner, safer and greener places and improved open spaces will build resilience and provide wider benefits for people, health and biodiversity, in a balanced way. Virtual connectivity and active travel links will also be important.

- 8.4.7 **New policies to improve air quality alongside reducing climate change emissions:** Development proposals that would result in a significant adverse effect on air quality will not be supported. Development proposals will consider opportunities to improve air quality and reduce exposure to poor air quality.
- 8.4.8 **Ensuring that the full range of policies and proposals included in NPF4 will work together to support a fairer, more inclusive and equalities-based approach to planning in the future:** Human rights and equality considerations are embedded in decision making. Support is provided for development that will help to ensure human rights are maintained, for example: Policy 16 on quality homes which addresses the need for accommodation for Gypsy/Travellers and Travelling Showpeople yards, as well as homes for older people and disabled people; More broadly the cross-cutting outcome for 'A Fair and Inclusive Planning System' is clear that throughout the planning system, opportunities are available to engage in development planning and decisions about future development and that we expect everyone involved in planning to take steps to ensure that a wide range of people are involved in shaping their future places.
- 8.4.9 **Refocusing our planning for housing policies on quality and place, so that the needs of everyone, including older people and disabled people, can be met. We have strengthened requirements for affordable housing provision and have included policies that help to diversify delivery and reflect the future needs and aspirations of communities:** NPF4, including the changes introduced by Policy 16, supports the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.
- 8.4.10 **Supporting quality homes in places that would benefit from them, including town centres, rural and island communities, brownfield and vacant and derelict land, and adaptation and re-use of disused properties:** NPF4 policies encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, helping to reduce the need for greenfield development.
- 8.4.11 **Ensuring our communities benefit from accessible, high quality blue, green and civic spaces:** NPF4 supports protection and enhancement of blue and green infrastructure and their networks, as well as providing good quality local opportunities for play, recreation and sport to ensure our places are greener, healthier, attractive, nature positive and more resilient to the effects of climate change. Development proposals for space or facilities for local community food growing and allotments will be supported.
- 8.4.12 **Reducing the need to travel unsustainably by embedding the Sustainable Travel and Investment Hierarchies into decisions:** The spatial principles which shape NPF4 aim to support more compact growth and the reuse of land within settlements, thereby supporting the use of existing infrastructure such as public transport networks. The Infrastructure First policy is consistent with, and effectively applies the sustainable travel

and investment hierarchies into planning and decision making. NPF4 also states that local development plans should aim to reduce the need to travel unsustainably by prioritising locations for future development that can be accessed by sustainable modes. The spatial strategy should reflect the sustainable travel hierarchy and sustainable investment hierarchy by making best use of existing infrastructure and services. NPF4 promotes the value of good design in creating great places and reflecting the six qualities of successful places. Local development plans are required to be underpinned by the six qualities of successful places. The Place Standard is also highlighted as a tool to facilitate engagement in planning.

- 8.4.13 **Promoting and facilitating a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels:** Policies support community wealth building and economic development that will help to deliver employment and supply chains, and support community ownership and management of buildings and land. NPF4 states that local development plans should allocate sufficient land for business and industry. This should take account of local economic strategies and support broader objectives of delivering a low carbon and net zero economic recovery, fairer and more inclusive wellbeing economy.
- 8.4.14 **Encourage, promote and facilitate the rollout of digital infrastructure across Scotland to unlock the potential of all our places and the economy:** NPF4 sets out that local development plans should support the delivery of digital infrastructure, including fixed line and mobile connectivity, particularly in areas with gaps in connectivity and barriers to digital access.
- 8.4.15 **Actions to tackle child poverty:** NPF4 recognises that disadvantage, child poverty and poor health outcomes are concentrated in parts of Scotland where life expectancy is significantly lower than in more advantaged areas. It recognises the spatial implications of child poverty and responds to spatial analysis showing areas where child poverty is concentrated. As well as giving spatial prioritisation, the NPF4 policies are designed to support a well-being economy and can therefore help to tackle child poverty.

8.5. National Developments

- 8.5.1 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.
- 8.5.2 The national developments contained in NPF4 are aligned to wider Scottish Government policy objectives as well as the aims of the spatial strategy.
- 8.5.3 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.
- 8.5.4 NPF4 identifies 18 national developments, further information on relevant national developments is included in stage 4 below.

8.6. Stage 4 - Decision

- 8.6.1 The Scottish Government made a number of changes in light of the feedback received on the Draft NPF4. Key changes relevant to this assessment are set out below.
- 8.6.2 **Confirmation that the purpose of planning is to manage the development and use of land in the long term public interest:** The adopted NPF4 is consistent with the statutory purpose of planning and makes more explicit the planning system's contribution to the delivery of the National Performance Framework and its outcomes and indicators.
- 8.6.3 Confirmation that planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality: To respond to stakeholder views, universal policies have been removed to focus on climate emergency/nature crisis. Human Rights and Equality now cited as a cross-cutting outcome under 'A Fair and Inclusive Planning System'.
- 8.6.4 A policy on community wealth building which provides opportunities that deliver local growth and wellbeing, within an economy that is inclusive and that promotes sustainability, prosperity and resilience: This policy has been updated to provide criteria to assess proposals against and to improve definition. Spatial strategies should support community wealth building; address economic disadvantage and inequality; and provide added social value. Local development plans should address community wealth building priorities by reflecting a people-centred approach to local economic development.
- 8.6.5 An updated and simplified policy on design, quality and place requiring plans to reflect the six qualities of successful places: The policy on design, quality and place now sits in 'Liveable Places' and is more closely aligned with the set of policies that support liveability and improve the quality of life for everyone. The six qualities of successful places have been reviewed to more clearly reflect the key elements that constitute good design, ensuring places are consistently designed to be healthy, pleasant, distinctive, connected, sustainable and adaptable.
- 8.6.6 Updated policy on local living and 20 minute neighbourhoods: This policy has been revised to be more flexible by referring to the principles of local living more broadly, as well as the specific solution of delivering 20 minute neighbourhoods. This will allow the policy to be more readily applied to all parts of Scotland, providing benefits for communities in a wide range of contexts, including rural areas.
- 8.6.7 An updated approach to providing quality homes: 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. 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. Affordable housing policy has been

strengthened to require at least 25% of market sites to be delivered as affordable housing.

- 8.6.8 An updated policy on sustainable transport and active travel: 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. The policy has been reframed to focus on positive changes to support sustainable modes, rather than focusing solely on a reduction of unsustainable travel. The policy has been supplemented to make reference to including equalities groups in the earliest stages of decision making. Further consideration has been given to the applicability of the policy in rural areas. Related national developments include: a National Walking, Cycling and Wheeling Network; and Urban Mass/Rapid Transit Networks.
- 8.6.9 An updated and expanded policy on heat and cooling: We recognise that addressing fuel poverty will require greater energy efficiency and affordable, low carbon, distributed heat and electricity networks. Policies encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and adaptation to more extreme temperatures.
- 8.6.10 Revised NPF4 policies 'Blue and green infrastructure', and 'Play, recreation and sport': For adults in the 20% most deprived areas, the proportion who are within a five minute walk of a green or blue space had increased from 55% in 2016 to 62% in 2019. 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. For adults, 26% of adults in the most deprived areas were at a healthy weight, compared to 38% of those in the least 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. 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. Accessible, high quality natural and civic spaces can be used by communities for many activities: exercise and recreation, play, sport and connecting with nature. Outdoor spaces for play, recreation and sport 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. We have separated blue and green infrastructure (BGI) policy from play and sport in recognition of their different roles and to better reflect their respective importance in ensuring wellbeing for the environment, place and people. The separate policy on play, recreation and sport reflects the importance of outdoor leisure opportunities for people of all ages. Related National development: NPF4 contains a national development for a Central Scotland Green Network.
- 8.6.11 A revised NPF4 Policy 'Health and safety': 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. This policy has been reviewed to clarify the role of the development plan and development management. Links are made to exercise and food growing. Suicide risk is a new element included in the policy. Makes clear the cross-cutting nature of health and makes explicit links to a wide range of policies such as natural environment, housing, transport, blue and green infrastructure and play.

- 8.6.12 **Revised NPF4 Policy ‘Business and industry’:** Having paid work is an effective way out of poverty, and those families where all adults are in full-time work have a low poverty risk. One of the three main drivers of child poverty reduction is to increase household incomes through work. Fair Work is also crucial to eradicating child poverty by providing flexible job opportunities that respect caring responsibilities and other commitments workers may have. This policy has been restructured and the policy intent contributes to wider goals such as the wellbeing economy and community wealth building.
- 8.6.13 **Supporting the provision of appropriate, universal and future proofed digital infrastructure:** Being older or disabled, living in a deprived area or living in social housing are risk factors for exclusion from access to digital services. Digital policy has been updated, supporting the provision of appropriate, universal and future proofed digital infrastructure so that all parts of Scotland have access to suitable digital infrastructure to eliminate the digital divide; a sharp focus is given to delivery of digital infrastructure in remote and rural areas and areas with no or low connectivity. Related National Development: NPF4 contains a national development for a Digital Fibre Network.
- 8.6.14 **Encouraging the reuse of land and buildings:** 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 indicate that living in proximity to vacant and derelict land is associated with negative impacts on health and wellbeing. An updated and expanded policy on brownfield, vacant and derelict land and empty buildings which encourages re-use of land and buildings and limits the support for greenfield locations, unless they are specifically supported by the local development plan.
- 8.6.15 Areas with limited action being undertaken are set out below.
- 8.6.16 **Public Toilets:** Public toilets are particularly important for older people and disabled people, women and those with caring responsibilities, where a lack of toilets can prevent people from playing an active role in life. Requirements in the 2019 Planning Act set out that the LDP is to include a statement of the planning authority’s policies and proposals as to the provision of public conveniences. NPF4 Policy 15 (Local Living and 20 minute neighbourhoods) states that consideration will be given to local access to publicly accessible toilets as part of the contribution of development proposals to local living. We consider this is best dealt with at a local level aligned with wider policies relating to local living and town centres.
- 8.6.17 **Digital Connectivity:** There are two aspects to inequality in digital access: inequality of digital skills and confidence, and inequality of digital resources.

Whilst the planning system can support the roll-out of digital infrastructure, including through the Digital Fibre Network national development, without also addressing digital skills this may not lead to those in disadvantaged communities having greater access to digital services. Digital skills development lies beyond the scope of the planning system.

- 8.6.18 **Public Transport and Connectivity:** The Fairer Scotland Duty assessment⁴⁵ accompanying National Transport Strategy 2 noted research from the Joseph Rowntree Foundation which found that access and affordability of public transport can be a concern for people on low income. This compounded by the fact that poor service coverage is more likely in deprived communities. The planning system cannot directly influence the affordability of public transport services. However, local living, the 20 minute neighbourhoods concept and support for active travel can support an alternative for some journeys. The spatial strategy aims to achieve balanced development and this includes supporting new development in areas where the market has previously shown less interest but where regeneration would help to overcome disadvantage. This, together with the broader policy approach, suggests that more mixed use development could help to better connect communities with employment, education and local facilities. Support is also provided through the NPF4 national development for: Urban Mass/Rapid Transit Networks. The finalised policy on transport was also updated to recognise the importance of involving a wide range of users in establishing accessibility issues, as well as the importance of a development's context in establishing transport requirements.
- 8.6.19 **This Fairer Scotland Assessment template was signed off by Fiona Simpson, Chief Planner**

⁴⁵ [national-transport-strategy-2-fairer-scotland-duty-summary.pdf](#)



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