

## UPDATE ON SCOTTISH GOVERNMENT NPF4 POSITION STATEMENT

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### 1.0 EXECUTIVE SUMMARY

- 1.1 The Scottish Government is currently preparing National Planning Framework 4 (NPF4). The Planning (Scotland) 2019 Act has changed the nature of the National Planning Framework when it is produced, giving it enhanced status. It will provide a renewed focus on rural development including rural repopulation, give a stronger steer on housing delivery and diversification including the setting of targets on land for housing, and will become part of the statutory development plan, requiring to be taken into account in determination of planning applications and preparation of local development plans.
- 1.2 It is therefore important that Argyll and Bute participates in the NPF4 engagement to ensure that the Area's strategic priorities for infrastructure and economic investment are considered for inclusion in the Plan and the Area's unique rural nature is reflected in the policy context which is set.
- 1.3 Scottish Government has produced what it calls an NPF4 Position Statement which has been prepared in response to ideas submitted as part of the early engagement that took place in the first half of 2020 and to which Argyll and Bute fed in. The Position Statement aims to inform further discussions and is not itself a document setting out policy. It is important to emphasise that no decisions have been made and the Scottish Government will extensively consult on the detail in Autumn 2021.
- 1.4 This report highlights the Position Statement and Proposed Comments on it. Full text of the Position Statement is in **Appendix 1**. The Position Statement invites comments by February 19<sup>th</sup> and Argyll and Bute's proposed comments are included in **Appendix 2**.

### 2.0 RECOMMENDATIONS

- 2.1 Members note the contents of the NPF4 Position Statement and endorse the proposed comments, or amend as appropriate, in **Appendix 2** of this report for submission to the Scottish Government.

## UPDATE ON SCOTTISH GOVERNMENT NPF4 POSITION STATEMENT

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### 2.0 INTRODUCTION

- 2.1 This report highlights the recently produced Scottish Government NPF4 Position Statement. The Position Statement is an update on progress made towards production on the draft NPF4 which is anticipated in Autumn 2021 when there will be further consultation. Presently comments are invited on the Position Statement by mid-February and the report contains proposed comments for endorsement by members.

### 3.0 RECOMMENDATIONS

- 3.1 Members note the contents of the NPF4 Position Statement and endorse, or amend as appropriate, the proposed comments in **Appendix 2** for submission to the Scottish Government.

### 4.0 DETAIL

- 4.1 The Scottish Government is currently preparing National Planning Framework 4 (NPF4). The Planning (Scotland) 2019 Act has changed the nature of NPF4 when it is produced, giving it enhanced status. It will have a longer time-horizon, fuller regional coverage and improved alignment with wider programmes and strategies, including on infrastructure and economic investment. NPF4 will also provide a renewed focus on rural development including rural repopulation, which is the key priority for the Council (Argyll and Bute Outcome Improvement Plan). NPF4 will also give a stronger steer on housing delivery and diversification

including the setting of targets on land for housing. For the first time, NPF4 will also become part of the statutory development plan, requiring to be taken into account in determination of planning applications and preparation of local development plans.

4.2 It is therefore important that Argyll and Bute participates in the NPF4 engagement to ensure that the Area's strategic priorities for infrastructure and economic investment are considered for inclusion in the Plan. It is also important to try to ensure that the policy that emerges in NPF4 has considered Argyll and Bute's unique context and needs with remote rural areas, islands, edge of conurbation and as gateway to the Loch Lomond and Trossachs National Park.

4.3 The Scottish Government has produced what it calls an NPF4 Position Statement.



4.4 The Position Statement has been prepared in response to ideas submitted as part of the early engagement that took place in the first half of 2020 and to which Argyll and Bute fed in. This included submission of the Indicative Regional Spatial Strategy for Argyll and Bute and all other Councils which can be seen diagrammatically below.

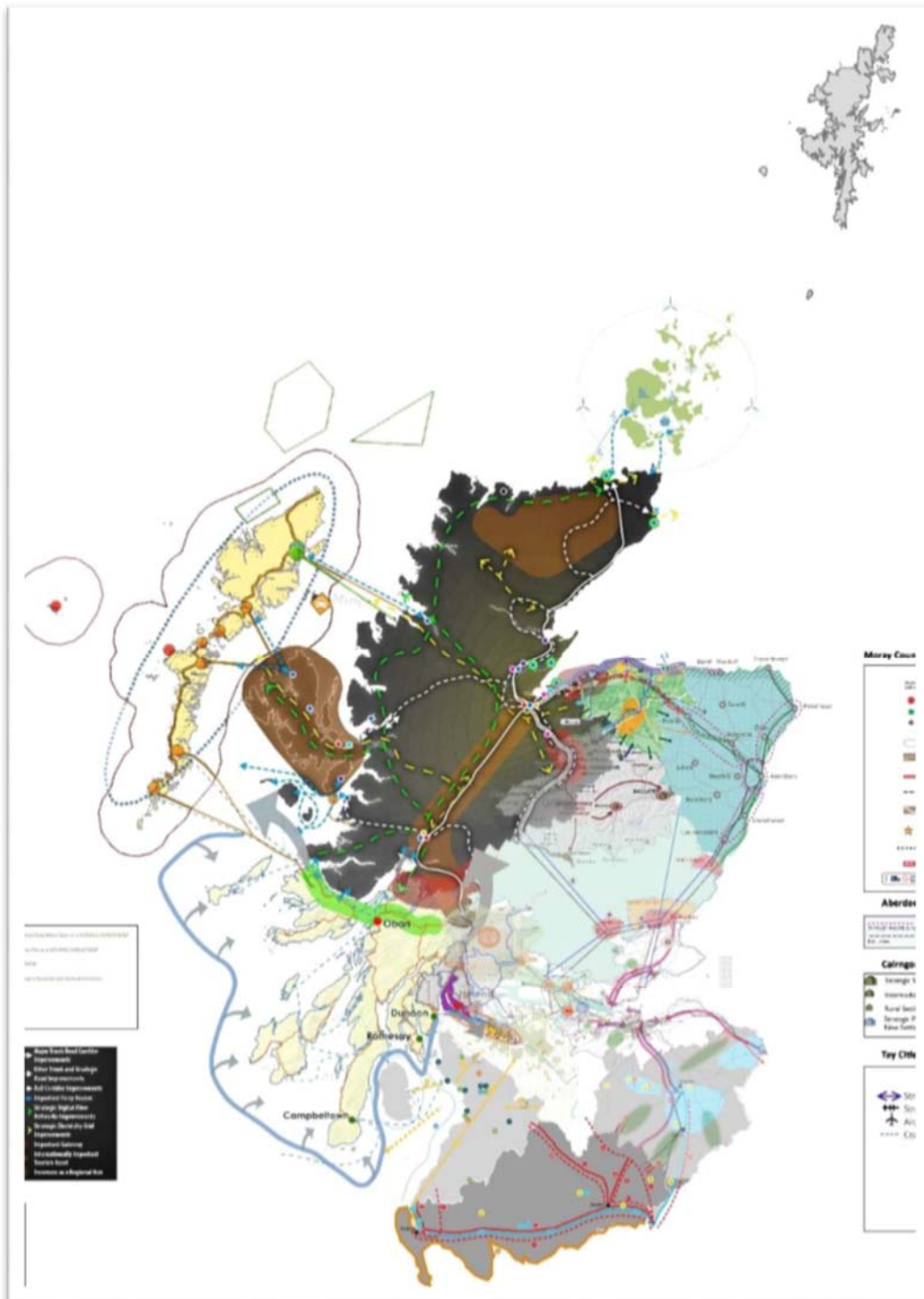


Fig 2: Scottish Govt. Amalgamation of All Local Authority iRSS Spatial Diagrams.

- 4.5 The Position Statement aims to inform further discussions and is not itself a document setting out policy. It is important to emphasise that no decisions have been made and the Scottish Government will extensively consult on the detail in Autumn 2021.

- 4.6 The current National Planning Framework (NPF3) and Scottish Planning Policy remain in place until NPF4 is adopted which we anticipate will be by the summer of 2022.

### **Summary of Potential Key Policy Shifts for NPF4 indicated in the Position Statement**

- 4.7 The Position Statement signals a key shift towards a net zero agenda and sets out thinking over 4 key themes – net zero emissions, resilient communities, wellbeing economy and better greener places.
- 4.8 Some of the most significant changes Scottish Government expected to explore in the development of NPF4 are:
- Stronger support for sustainable, low and zero carbon developments.
  - A renewed emphasis on design, quality and place.
  - Support for development that reduces the need to travel, in line with the concept of 20 minute neighbourhoods.
  - A shift in the way we plan our homes so that we focus on meeting our diverse needs, and improve the quality of our places.
  - New policies to promote an infrastructure-first approach to development at all scales.
  - A new approach to ensure our places work for everyone, and are greener and healthier.
  - Enabling development and investment, including inward investment, that improves our collective wellbeing and supports fair work.
  - New policies to address key economic sectors including food and drink, culture and the creative sectors, and tourism.
  - Reimagining our city and town centres as a place to live, work and enjoy.
  - Prioritising development on vacant and derelict land.
  - Support for development that improves the resilience and sustainability of our rural economy and communities.
  - Facilitating improvements to our biodiversity and the significant expansion of green infrastructure.
- 4.9 The full text of the Position Statement is in **Appendix 1**. The Position Statement invites comments by February 19<sup>th</sup> and Argyll and Bute's proposed comments are included in **Appendix 2**.
- 4.10 A summary of key proposed Argyll and Bute comments are as follows:

- There is a limit to what can be achieved by applying twenty minute neighbourhoods in Argyll and Bute and any framework should reflect rural areas.
- Improving the energy efficiency of new buildings is an aim we support but Building Standards is the more appropriate regulatory framework not planning.
- Housing targets set by NPF4 must not merely reflect current demographic trends. If we are to reverse rural depopulation they must identify targets above those trends.
- Increased support for more renewable energy development should also include supporting the wellbeing economy, in other words deriving local benefits during construction and operation.
- An infrastructure first approach is welcomed but it must be recognised that in remote rural areas there is little if any opportunity to see private finance for infrastructure, and public investment must be aligned with planned development in a timely fashion. We need a system of front ended strategic investment in new infrastructure capacity so that development can be brought forward in a planned and strategic manner following that investment, not piecemeal.
- Redistribution of public sector jobs to remote rural areas, shown possible by the last 12 months home working, will not only align with this sentiment, but make the most significant difference to achieving repopulation of rural areas. It is a huge opportunity which is within the gift of Scottish Government.
- Request clear support for identifying and delivering a permanent solution to the Rest and Be Thankful.
- Argyll and Bute submitted its iRSS to Scottish Government and would wish to see elements of that document identified within NPF4 as National Proposals or sites. Particularly, three major areas of existing growth potential as identified in Argyll and Bute's iRSS: Tobermory-Oban-Dalmally Growth Corridor; Helensburgh and Lomond Growth Area; and Argyll and Bute Western Seaboard.

4.11 After submission of these comments, the immediate next steps for Scottish Government are:

- Further collaborative work will allow development of the indicative Regional Strategies (iRSS) if required so that they can be submitted for the end of April 2021.
- The iRSS submissions will help to inform the preparation of a national spatial strategy.
- Work will progress to update Scottish Planning Policy.

4.12 Following this there will be a period during which a draft NPF4 will be prepared, to be presented to Parliament in the autumn of 2021. Following the draft NPF4 being laid in Parliament in autumn 2021 there will be a period

of formal public consultation after which a finalised NPF4 will be adopted in the spring / summer of 2022. The table below shows this timetable.



Fig3: Scottish Govt. Timetable for NPF4 Production.

## 5.0 CONCLUSION

- 5.1 The Scottish Government is currently preparing National Planning Framework 4. The NPF4 will become part of the Development Plan for determining planning applications and will include a statement of Scottish Planning Policy. It is therefore important that Argyll and Bute participates in the NPF4 engagement to ensure that the Area's strategic priorities for infrastructure and economic investment are considered for inclusion in the Plan.
- 5.2 Scottish Government has produced what it calls an NPF4 Position Statement. This is not a statement of policy but reflects the consultation discussion that has been ongoing so far. Comment has been invited on the Position Statement for the 19<sup>th</sup> February and this report outlines the proposed Argyll and Bute response subject to Member comments.

## 6.0 IMPLICATIONS

- |     |           |  |
|-----|-----------|--|
| 6.1 | Policy    | The Position Statement will feed in to the NPF4 which will eventually become part of the Development Plan for determining planning applications. |
| 6.2 | Financial | None.  |
| 6.3 | Legal     | None.  |
| 6.4 | HR        | None.  |

- 6.5 Fairer Scotland Duty: Scottish Government will be required to carry out appropriate assessments.
  - 6.5.1 Equalities - protected characteristics Scottish Government will be required to carry out appropriate assessments.
  - 6.5.2 Socio-economic Duty Scottish Government will be required to carry out appropriate assessments.
  - 6.5.3 Islands Scottish Government will be required to carry out appropriate assessments.
- 6.6 Risk That Argyll and Bute is not represented within the NPF4 as we would wish it to be.
- 6.7 Customer Service None.

**Executive Director with responsibility for Development and Economic Growth  
Policy Lead Cllr David Kinniburgh**

[report prepared 22.01.21]

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**APPENDICES**

Appendix 1: NPF4 Position Statement

Appendix 2: Argyll and Bute Proposed Comments on NPF4 Position Statement





# Scotland's Fourth National Planning Framework Position Statement

November 2020



# Contents

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**01 Ministerial Foreword**

---

**02 Our Future Places**

---

**04 A Plan for Scotland in 2050**

Outcomes for 2050

---

**06 A Plan for Net-Zero Emissions**

You told us...

Our new spatial strategy will:

- Prioritise emissions reduction
- Integrate land use and transport
- Facilitate design solutions and innovation
- Promote nature-based solutions
- Deliver infrastructure to reduce emissions

Potential policy changes

---

**11 A Plan for Resilient Communities**

You told us...

Our new spatial strategy will:

- Apply the concept of 20 minute neighbourhoods
- Strengthen community resilience
- Promote inclusion and equality and eliminate discrimination
- Improve our health and wellbeing
- Actively plan and support the delivery of good quality homes
- Promote an infrastructure-first approach to community development
- Enhance and expand natural infrastructure
- Achieve more sustainable travel

Potential policy changes

---

**20 A Plan for a Wellbeing Economy**

You told us...

Our new spatial strategy will:

- Support a sustainable and green economic recovery
- Reduce inequality and improve health and wellbeing
- Provide certainty and flexibility to encourage investment
- Grow our food and drink sector
- Support sustainable tourism development
- Stimulate culture and the creative industries
- Transition to a circular economy
- Promote sustainable resource management
- Secure strategic transport connectivity
- Improve digital connectivity

Potential policy changes

---

**29 A Plan for Better, Greener Places**

You told us...

Our new spatial strategy will:

- Focus on place-based outcomes
- Achieve higher quality design
- Re-imagine city and town centres
- Re-use vacant and derelict land and empty buildings
- Actively promote working and living in rural Scotland and the islands
- Protect and restore Scotland's natural environment
- Protect and enhance our historic buildings and places
- Adapt our coastline to the impacts of climate change

Potential policy changes

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**37 Delivery**

---

**40 Next Steps**

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# Ministerial Foreword



**Kevin Stewart MSP**  
Minister for Local Government,  
Housing and Planning

## The quality of our places really matters.

Scotland has many strengths and assets that we have depended on throughout the global pandemic. We have an exceptional environment with great buildings and a strong sense of character and identity. Many of us live in places that can provide the facilities we need within a short walk from our homes. However, that experience hasn't been shared by everyone. By not always considering the needs of all people, irrespective of their age, gender, geography, disability or socio-economic status, it has become clear that decisions about our places that were made in the past have locked in future problems. Inequality persists – within our society, and between the places where we live. Too often, places don't do enough to support our health and wellbeing and we still have more to do to build the homes that people need. COVID-19 has shown us that people can feel more isolated where there are too few accessible local amenities or nearby green spaces for play or physical activity.

Our [Programme for Government](#), recognises the important role that our National Planning Framework, along with local development plans and local place plans, can have in redesigning our communities to best respond to the pandemic. Emerging regional spatial strategies also have a great deal to contribute to the future of long-term planning in Scotland.

National Planning Framework 4 will set out a new plan for Scotland in 2050. The strategy will have to make some big decisions about our future development. Our ambitious targets for addressing climate change demand a fresh approach and significant investment in infrastructure, as well as a new understanding of how zero carbon living might work. We need to anticipate and plan for our changing population to focus more on improved health and wellbeing and a better natural environment for everyone in Scotland. It is clear that good quality homes must be delivered in the right places, alongside the services and facilities that communities need. It is essential that planning supports our green economic recovery in the short term, as well as enabling strategic investment in the long term. And all of this must be achieved through a highly performing planning system that improves our places: our cities; towns; villages; rural; and island areas.

The preparation of National Planning Framework 4 is a significant task that cannot be achieved by government alone. Our approach has been open and collaborative from the start, and I am very grateful to all those who have taken the time to share their thinking on a new spatial plan and policy changes. This Position Statement brings together the thoughts and ideas we have heard so far with wider Scottish Government commitments to begin to set a new course for planning in Scotland.

# Our future places

Our places will look and feel different in the future. A significant shift is required to achieve net-zero emissions by 2045.

We cannot afford to compromise on climate change. If we are to meet our targets, some significant choices will have to be made. We will make these choices next year as we move towards a draft National Planning Framework 4 for public consultation and Parliamentary scrutiny, but it is already clear that significant effort will be required. We will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions. We will need to focus our efforts on actively encouraging all developments that help to reduce emissions. This is not about restricting development. Our aim is to help stimulate the green economy by facilitating innovation, greener design and place-based solutions.

**Key opportunities to achieve this, as set out in this Position Statement, include:**

- 1.** Building 20 minute neighbourhoods. We can plan our homes together with everyday local infrastructure including schools, community centres, local shops and healthcare to significantly reduce the need to travel. This is not just about new buildings – we want to guide change in a way that also helps to transform our existing places.
- 2.** Introducing a stronger preference for reusing existing buildings before new development proceeds.
- 3.** Shifting future development away from greenfield land including by actively enabling the redevelopment of vacant and derelict land.
- 4.** Strengthening our support for development in town centres and restricting out-of-town retail and leisure to help us transition away from car-dependent developments towards those that enable walking, cycling, wheeling and public transport accessibility.
- 5.** Stimulating new models of low carbon living in our rural areas as well as our towns and cities, by facilitating further investment in digital infrastructure, building in more space for people to work remotely and creating community hubs.

6. Expecting low and zero carbon design and energy efficiency, for example by actively encouraging much wider use of sustainable and recycled materials in new developments.
7. Significantly strengthening our policies to secure low carbon heating solutions.
8. Supporting renewable energy developments, including the re-powering and extension of existing wind farms, new and replacement grid infrastructure, carbon capture and storage and hydrogen networks.
9. Harnessing the potential for rural development to act as a lever to facilitate woodland creation and expansion.
10. Expanding green infrastructure, biodiversity and natural spaces to make our places greener, healthier and more resilient to the impacts of climate change.
11. Restricting peat extraction and development on peatland, and facilitating restoration through permitted development rights.
12. Removing the need for planning permission for active travel and electric vehicle charging points to ensure that we can roll-out new infrastructure widely and quickly.

# A Plan for Scotland in 2050

We are preparing a new spatial plan for Scotland that will look ahead to 2050 to set out where future development can bring benefits for people, the economy and environment. The fourth National Planning Framework (NPF4) will show what Scotland, as a place, could and should look like in 2050. It will include national planning policies, providing a clear and coherent plan for our future development. And it will have the status of development plan, informing day to day planning decisions.

NPF4 will embed the UN Sustainable Development Goals<sup>1</sup> and Scotland's national outcomes<sup>2</sup>. The Place Principle<sup>3</sup> will be a key driver for ensuring that planning focuses on our places, and is supported by a much wider range of interests to ensure that proposals and policies are delivered on the ground.

No decisions have been made yet. At this stage we have taken stock of what we have learned so far about the priorities for NPF4, and set them out in this Position Statement. Much of our thinking is informed by views and ideas we received from our initial engagement in early 2020. Over the year ahead we will continue to work collaboratively with a wide range of stakeholders to further develop these proposals. We expect to lay the draft NPF4 in the Scottish Parliament in autumn 2021, and will consult publicly on our fuller proposals at that stage. NPF4 will be presented digitally as part of a new spatial data platform.

This Position Statement sets out our current thinking to inform further discussions on the content of a draft revised framework for consultation. It aims to support those discussions and is not, in itself, a document setting out policy. Statements in this Position Statement as to what the content of a revised National Planning Framework will contain should be read in that context. The final content of NPF4 will only be established following consultation and consideration, and approval, of the draft revised framework by the Scottish Parliament.

The current National Planning Framework (NPF3) and Scottish Planning Policy remain in place until NPF4 is adopted by Ministers.

## Outcomes for 2050

The long-term strategy will be driven by the overarching goal of addressing climate change. We must play our full part in tackling the global climate emergency by reducing greenhouse gas emissions in line with our legal targets. Many places are already vulnerable to the impacts of climate change and we must build future resilience by making better choices. This can also improve our places.

We currently expect that NPF4 will focus on achieving four key outcomes:



In line with ongoing planning reform, we will also do more to ensure our national spatial strategy and policies will be delivered. Alignment with the Infrastructure Investment Plan, and our response to the recommendations of the Infrastructure Commission for Scotland, will be key to achieving this.

To open up wider conversations to further inform the future draft NPF4, this statement considers each of these outcomes in turn. Each section reflects views we have heard so far, emerging spatial priorities, and potential policy changes.

# A Plan for Net-Zero Emissions



We will prioritise the types and locations of development that will help meet our emission reduction targets.



We will build on the Climate Change Plan and take forward advice provided by the UK Climate Change Committee. The recommendations of the Just Transition Commission will also inform our actions<sup>4</sup>.



Our future places will be planned in a way that reduces the need to travel and builds in natural solutions.



Our buildings will be more energy efficient and will be designed to be sustainable.



We will actively facilitate decarbonised heating and electricity generation and distribution.



## You told us...

- We need a swift and decisive response to the global climate emergency at all levels – national, regional, local and community.
- The time is right to give greater weight to climate change as a crucial factor influencing decision making on our future land use.
- We should be addressing long term climate change in a way that benefits communities and the economy more widely.
- Views vary on the most effective solutions. Some suggest a targets-based approach at either a national or a regional level. Others propose increasing the requirements for new developments, and want to make it easier to put in place new infrastructure that would help to reduce emissions.
- Heat, energy efficiency, housing, green infrastructure, onshore and marine renewables have all been highlighted as development priorities for planning to address.
- Policies should reflect the importance of growing the green economy, including renewable energy and the circular economy, to help meet our climate change targets and secure good quality jobs and investment.
- Challenges around this include balancing the need for new infrastructure with minimising impacts on communities and the environment. We will also need flexibility to ensure our policies keep pace with future technological change.
- It is essential that we plan our future land use together with our transport network to actively reduce the need to travel and promote low carbon transport options.
- Land can generate, and reduce, emissions. It will be important to align with wider land use management to tackle issues including woodland creation, peatland restoration, natural flood management, bioenergy and improving biodiversity.
- NPF4 is an opportunity to consider long term change at a national scale, as well as focusing in on geographic 'hot spots' of development and infrastructure that could be prioritised and supported as part of a national effort to reduce emissions.



## Our new spatial strategy will:

### Prioritise emissions reduction

Climate change will be the overarching priority for our spatial strategy. To achieve a net-zero Scotland by 2045 and meet the interim emissions reduction targets of 75% by 2030 and 90% by 2040, an urgent and radical shift in our spatial plan and policies is required. Scotland's updated Climate Change Plan will be published later this year, setting a course for achieving the targets in the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019. NPF4 will take forward proposals and policies to support it.

No single development or planning policy can achieve this. The strategy as a whole will be designed to minimise emissions from new development. We will work alongside the development of Scotland's next Land Use Strategy to guide long-term land use change in a way that helps to reverse patterns of behaviour that are already contributing to emissions. We will do this in a way that achieves economic, health and other environmental benefits through a just transition.

To help inform this, we will bring together and reflect emerging regional spatial strategies and their proposals for strategic development that helps to reduce emissions and aligns with emerging thinking on wider regional land use. The transition from energy intensive to zero carbon economies is a key challenge that is being actively considered across national and regional scales. It is increasingly recognised that the impacts of climate change may be best tackled at a strategic scale – i.e. managing flooding through upland management, and capturing carbon through tree planting and strategic peatland restoration. These are some ways in which regional spatial strategies are reflecting these opportunities. Early work shows that there are opportunities for planning to support a transition to a lower carbon economy in areas that include the Firth of Forth, the North East and island communities.

### Integrate land use and transport

The location of development determines the intensity of emissions that it will generate throughout its lifetime. Our strategy will promote future patterns of development that embed the National Transport Strategy 2 (NTS2) Sustainable Travel Hierarchy<sup>5</sup> in decision making. We will seek to promote high quality walking, wheeling and cycling environments, public transport and shared transport options in preference to single occupancy private car use. This will help us to meet our climate change targets and transition towards healthier, more local, zero carbon living and working. Clear choices will need to be made to direct development to locations which reduce the need to travel and are already well served by sustainable transport options.

Our approach will ensure transport options that focus on reducing inequalities and the need to travel unsustainably are prioritised. We also need to maintain and safely operate existing transport infrastructure and services, and ensure our transport networks can adapt to the impacts of climate change. Only after that should investment involving targeted infrastructure improvements be considered. Ultra-low emission vehicles (ULEV), including electric vehicles will have a role to play, particularly with regard to shared transport, and so we will also plan for electric vehicle infrastructure.

### Facilitate design solutions and innovation

We will ensure planning policies support the very significant reductions in emissions from buildings that we need to see. This is not just about new development – our existing buildings and places will need retro-fit solutions and we will make use of the embedded carbon across the built environment. Planning can facilitate low carbon methods of construction, which create a whole building approach to emissions including construction and decommissioning. We will support developments that make use of low energy and emission materials as well as natural and micro-climate features which reduce the resource demand of the development. We will align our strategy with Building Standards to create a consistent approach, and actively encourage buildings that go beyond current standards where there is appetite to do so. We will also enable and encourage deployment of renewable and zero emissions heating, including by facilitating development of the networks they require.

### Promote nature-based solutions

The climate and nature crises are intrinsically linked. It is estimated that around a third of the global mitigation effort needed to deliver the goals of the Paris Climate Agreement could be achieved through nature-based solutions.

Scotland's natural environment plays a vital role in removing carbon from the atmosphere and securing it in natural habitats on land and in our seas. Promoting nature-based solutions to climate change, including tree planting and peatland protection and restoration, and tackling emissions related to soil disturbance and agricultural land use, will be essential to reduce emissions from our land and increase carbon sequestration. They can also help to sustain and grow rural communities and improve the quality of our built environment. Our spatial strategy will explore how we can promote nature-based solutions to climate change, which also protect and restore biodiversity and deliver wider benefits.

### Deliver infrastructure to reduce emissions

We expect that NPF4 will confirm our view that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments. We have made good progress in transitioning from reliance on fossil fuels to renewable electricity generation in a way which is compatible with our environmental objectives. Scotland is a net exporter of electricity and in the past decade renewable electricity output has grown markedly. However, significant further investment will be needed to support new technologies for carbon capture and storage; hydrogen; sustainable and active travel; electricity grid capacity (including subsea links to the islands); and decarbonisation of heating, our transport networks and vehicle fleets<sup>6</sup>.

As a priority, our strategy will need to facilitate the roll-out of renewable electricity and renewable and zero emissions heat technologies. We will need to switch to low and zero carbon fuel sources, and support the delivery of associated infrastructure, such as grid networks and gas pipelines. We will ensure that NPF4 helps to deliver on our wider energy strategies including the Scottish Energy Strategy<sup>7</sup> (including any updates), our Energy Efficient Scotland route map<sup>8</sup>, the forthcoming Heat in Buildings Strategy, our vision to 2030 for Scotland's electricity and gas network and the Infrastructure Investment Plan<sup>9</sup>.

We will consider whether proposed national developments can help us to deliver on this vision. The full list of proposals we have received is available to view at [www.transformingplanning.scot](http://www.transformingplanning.scot) and include, for example: carbon capture and storage infrastructure; on and offshore renewable energy generation and networks; clean hydrogen production and distribution; energy innovation zones; heat networks; and walking, wheeling and cycling infrastructure.

# Potential policy changes

We are currently considering the following priority policy changes to support a spatial strategy for net-zero emissions:

- Strengthening support for retaining and reusing existing buildings to maximise the use of the embodied energy of our building stock. We will consider how carbon assessments can ensure that the carbon stored in buildings is accounted for in decision making.
- Making it more difficult for new developments that generate significant emissions, across the lifecycle of a development as a whole, to gain planning permission.
- Supporting the use of materials with low embodied emissions, that can act as an emissions store and where the materials can be re-used with minimal re-processing at end of life of the building to avoid release of the embodied emissions.
- Embedding of the National Transport Strategy 2 Sustainable Travel and Investment Hierarchies into the appraisal and assessment of development proposals as well as the proposals themselves. This will also be achieved through an infrastructure-first approach to future development.
- Actively planning future development in a way that helps us to achieve zero carbon living that minimises the need to travel by unsustainable modes, for example by helping to create 20 minute neighbourhoods where achievable.
- Facilitating development that is highly energy efficient and which meets greenhouse gas emissions standards, including making provision for zero carbon energy generation.
- Setting out a consistent policy for meeting Section 3F of the Town and Country Planning (Scotland) Act 1997 in relation to emissions policies.
- Clarifying where net-zero building approaches may allow development to proceed by offsetting emissions.
- Promoting nature-based solutions to climate change, including woodland creation and peatland protection and restoration.
- Integrating development with natural infrastructure, including blue-green networks, to deliver multiple benefits including carbon sequestration, community resilience and health improvement.
- Strengthening our support for re-powering and expanding existing wind farms.
- Updating the current spatial framework for onshore wind to continue to protect National Parks and National Scenic Areas, whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site specific assessments.
- Introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen.
- Setting out a more practical and outcome-focused approach to accelerating a transition to renewable and zero emissions heating in buildings, including by linking with wider policies for green and blue infrastructure and vacant and derelict land and properties.
- In line with the Bank's primary mission, the Scottish National Investment Bank has the opportunity to use its investments to be part of the drive towards a just transition to net zero emissions.

# A Plan for Resilient Communities



We will focus on people and the quality of areas where we live.



We will apply concepts such as 20 minute neighbourhoods across our cities, towns, and rural areas so that the places where we live and work are more resilient and sustainable.



NPF4 will align with our vision for housing in 2040 and set out a long term view of the homes required to meet our future needs. We will focus on the location, quality and type of homes needed for people of all ages, reflecting long term population and household trends.



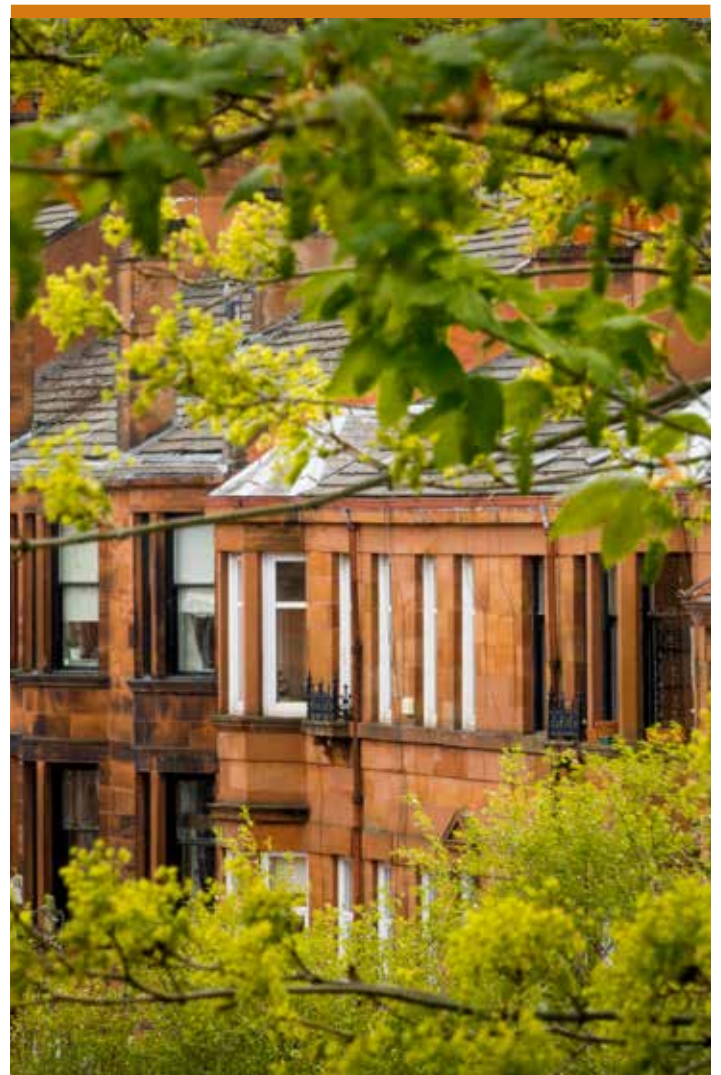
We will introduce, for the first time, an infrastructure-first approach to neighbourhood planning, including natural networks and sustainable travel, to ensure that we have fair access to the services we need to help make our communities a great place to live.



We will underpin this with policies which support our six public health priorities<sup>10</sup>, promote inclusion and equality, and help our places adapt to the long term impacts of climate change.

## You told us...

- We need to do more to ensure that a much wider range of people get involved in planning, promoting collaborative approaches over conflict.
- Planning needs to be proactive and make clear decisions about future development and investment priorities that are in the long term public interest.
- Places, particularly the places where we live, can make a big difference to our health and wellbeing. The experience of COVID-19 has underlined this.
- Improving health should be a key priority. Quality of place and sense of belonging are essential for our wellbeing and central to our aim of tackling longstanding health inequalities. Access to healthy food, physical activity, active travel, plus issues such as air quality, pollution, noise, decontamination and stabilisation of former mine workings are all priorities for planning.
- The quality of our homes really matters, and the way we plan for housing needs to change. There are many different ideas about the best approach but wide agreement that we should focus more on quality and the types of homes we will need in the future, rather than only on numbers of units.
- Our policies should reflect our diverse housing and accommodation needs, including the housing needs of older people, disabled people, students, Gypsy/Travellers and those living in rural communities. A wider range of new and innovative delivery solutions should also be supported.
- We need to consider, and address, the impacts of new development on local infrastructure including schools, healthcare, transport, green space and other community facilities. Places should be planned on the basis of an infrastructure-first approach so that everyone, irrespective of age, disability, gender, ethnicity or socio-economic status has ready access to essential services and facilities.
- Blue-green infrastructure should be an integral part of place-making and our policies on this can be strengthened. Good quality open spaces and green networks play a crucial role in supporting our quality of life and should be an integral part of place-making.
- Natural flood risk management, flood prevention and green infrastructure are key opportunities to manage our environment whilst achieving wider benefits for people, place and environment.
- Everyday travel, including walking and cycling and access to low carbon transport options contributes to the livability of our places and neighbourhoods, and there is support for stronger alignment of future development with existing and planned local transport infrastructure capacity.



## Our new spatial strategy will:

### Apply the concept of 20 minute neighbourhoods

Our spatial strategy and policies will reflect the needs and aspirations of people living throughout Scotland by building quality places that work for everyone. 20 minute neighbourhoods have the potential to reduce emissions and improve our health and wellbeing. We will explore how a new emphasis on living locally could work in different parts of Scotland, from remote rural communities to our towns and cities, taking into account the needs of everyone in society so that equality is built in from the start.

The 20 minute neighbourhood concept doesn't exist in isolation but scales up to include larger geographies and networked areas providing access and opportunities for the wide range of facilities and services that communities require. The ability to access goods and services through high quality walkable and accessible environments is increasingly recognised as providing strategic competitive advantage to attract and retain people and investment.

This vision will be supported by new and improved planning policies that bring together services and homes, giving life to the Place Principle and supporting public health and wellbeing and reducing inequality.

### Strengthen community resilience

A focus on neighbourhoods and local living will help our places to adapt to the impacts of climate change. Our climate is getting warmer and wetter, and more frequent extreme weather events will affect people and places. In summer, more intense rainfall could increase surface water flooding. In winter, more frequent rainfall could bring increased flooding from rivers. Sea level rise could affect the viability of some coastal communities through flooding and erosion. Scotland's Climate Change Adaptation Programme<sup>11</sup> promotes a joined-up approach to place-making that reflects local diversity.

Some places will be more vulnerable to the impacts of climate change than others: flood risk may be particularly acute in parts of our cities, whilst the livability and accessibility of our smaller towns could be significantly affected by flooding events in the future. By future-proofing the design of our streets and buildings and investing in natural infrastructure, including creating and restoring habitats upstream in catchments, we can substantially reduce our communities' exposure to flooding and the risks from changing temperatures. This also has the potential to provide equality, health, economic and wellbeing benefits for communities.

### Promote inclusion and equality and eliminate discrimination

The Scottish Government is committed to promoting equality, tackling discrimination and fostering good relations between people in all of our communities. We want to ensure that every person and every community in our country is able to achieve their full potential. The changes we are making to the planning system aim to strengthen public trust and encourage engagement in decisions about the future of our places. The Planning (Scotland) Act 2019 introduces local place plans. Linked to the NPF and local development plans they will provide the opportunity for communities to influence the development of their neighbourhoods in a way which builds on community empowerment across Scotland. These and wider changes also underline the importance of engaging with a wider range of people to develop our places, including children and young people.

We will consider how our future policies can learn from the experience of COVID-19 including by responding to the Social Renewal Advisory Board's recommendations and learning from their work to capture our shared experience of delivering equality and social justice.

The spatial strategy will be supported by new policies to encourage more people to get involved in planning, to improve equality and eliminate discrimination. The 2016 National Standards for Community Engagement, together with the Place Standard Tool<sup>12</sup>, provide a framework for involving people in planning their places. The Place Principle also recognises the need for a more joined-up and collaborative approach to decisions so that the combined impacts on places are understood and actively managed. We will look at how this can support techniques which encompass collaborative approaches to community engagement.

NPF4 is required to explain how our spatial strategy will contribute to improving equality and eliminating discrimination. People living in the most deprived areas and neighbourhoods are more exposed to environmental conditions and other factors that negatively affect health and access to opportunities – including those relating to transport, access to green space, pollution effects, housing quality, fuel poverty, community participation, and social isolation. Our future places and spaces need to be considered through the lens of gender, ethnicity, age and disability to ensure they are inclusive.

Many different planning policies have potential to directly and indirectly contribute to this, including those which aim to meet housing need, policies promoting community facilities and green space, and those relating to accessibility and design of the public realm. The development of the strategy is being supported by a range of impact assessments which will provide evidence on the impacts of policies on different people in society, and help to inform an approach which is fair for everyone.

### **Improve our health and wellbeing**

NPF4 will be redesigned to support the population's health and wellbeing and address longstanding health inequalities. We know that planning and place can compound problems such as poor diet and obesity, noise or air pollution, or it can be part of a solution. We will

help to deliver a wide range of policies and strategies, including Scotland's six Public Health Priorities<sup>13</sup>, the Active Scotland Delivery Plan<sup>14</sup> and associated commitments to increasing active travel; the new air quality strategy which will replace the current Cleaner Air for Scotland strategy in 2021; Scotland's Diet and Healthy Weight Delivery Plan<sup>15</sup>; Scotland's alcohol and drug harm prevention and reduction strategies; Scotland's Mental Health Strategy<sup>16</sup>; Scotland's Social Isolation Strategy<sup>17</sup>, and the National Health and Social Care Delivery Plan<sup>18</sup>. The Place Standard also underlines the importance of better health outcomes from joined-up, targeted action in our places.

Tackling health inequalities, as well as supporting the everyday healthcare needs of communities, require a long term plan. The quality of places has impacts on our health and wellbeing, from early years to later life. Planning can do more to directly support positive health outcomes and improve childhood experiences. More people living in Scotland in the future will be older, and we will also need to factor this in to ensure NPF4 properly anticipates our future needs.

Our approach will look at how the built environment can help prevent the need for healthcare spend in the first place, and increase our healthy life expectancy, by improving public health. Inclusive and accessible design, access to infrastructure, including healthy travel choices, and other measures to improve health should no longer be regarded as optional or a discretionary benefit, but a firm requirement for development to address. We will look to promote high quality design and development in sustainably accessible locations that attract investment, create opportunities and alleviate fuel and transport poverty. Natural (blue and green) infrastructure helps build community resilience, and in turn supports our health and wellbeing. Access to quality green space also has direct benefits for both mental and physical health and can help to tackle the impacts of inequalities.



## Actively plan and support the delivery of good quality homes

Our homes make an essential contribution to our health and quality of life and we recognise that good housing is the cornerstone of strong communities. Our future homes will be at the heart of a spatial strategy that puts people first. We expect that our spatial strategy will focus on delivering a wider range of homes to meet the needs of our changing population, in the right places. Our Housing to 2040 route map will be a plan for a well-functioning housing system to deliver good quality, energy efficient, zero carbon housing and housing-related services. The vision will set out how, by 2040, we want our homes to be accessible, affordable, well-designed and energy-efficient with the right homes in the right places to support both urban and rural communities. As a first step, we have already committed to review the current housing adaptations system and make recommendations on how best to improve and streamline the system and maximise the impact of investment. This will help to make best use of existing and planned housing stock to provide homes for as many people as possible and enable people to stay in their homes for longer. We will explore how planning can support this, including through an emphasis on type, accessibility, affordable living, quality, choice and energy efficient homes.

Our strategy will do more to guide housing to sustainable locations in a way which still allows for a local approach to be taken to address local issues and opportunities. We will encourage development planning to help shape this in different parts of Scotland.

To significantly simplify the system as a whole, we will set out the land required in each local authority area to support local development plans over the life of the plan, informed by national analysis with local input. This will ensure a nationally agreed approach to housing land is used as a starting point for local development plans, and is aligned with local housing strategies and wider strategic investment priorities.

Our spatial strategy will also consider the long term changes that we can expect, including: sustainable rural living, prioritising sustainable and accessible locations; prioritising new homes on brownfield land where appropriate; redevelopment of existing buildings; city and town centre regeneration; and more people working remotely or more locally in the future. Policies will work with these challenges and assets to create great places to live now and in the future. Energy efficiency, in both new homes and the existing stock, is a key objective that will help address fuel poverty and contribute to meeting our climate change targets.

We want to see design at the heart of any new housing development. Details that may seem insignificant in isolation – such as – orientation; colours; shapes; heights; materials and access to public and play spaces – collectively create better development that supports our wellbeing. Our aim is to plan and facilitate the delivery of new places that anyone would be proud to call home.

To build the right types of homes that we want and the amount that we need, we need everyone to work together. Planning can do more to enable development, but it cannot do this on its own. We are considering how our policies can actively support delivery and provide certainty to house builders and communities by providing good, shovel ready land that can be developed in the short term whilst also maintaining a steady pipeline of land that will come forward in the future. We are looking at how we can incentivise house builders to build on sites that have already been deemed suitable for housing by providing a mechanism for more land to be released from the longer term supply, once building begins on sites that already have planning permission. In line with the recommendations of the Infrastructure Commission for Scotland, an infrastructure-first approach will play an essential role in ensuring allocated sites are a viable proposition to be built out in line with the plan's delivery programme.

Gypsy/Travellers require a positive planning approach so that not just their future, but their current accommodation needs are met. Guidance has previously been published on this, and we have taken steps to raise this with planning authorities. NPF4 is a real opportunity to expand on our current planning policy to support Gypsy/Travellers in their human rights to travel and in their aspirations to invest in their own homes, taking into account research on the distribution of existing sites across Scotland<sup>19 20</sup>, as well as the provisions of the Planning (Scotland) Act 2019.

### **Promote an infrastructure-first approach to community development**

It is crucial that the services and facilities we use on a day to day basis are fairly, easily and affordably accessed. A wide range of facilities are required to support our wellbeing including health services, transport, accommodation and support for an ageing population, education, energy networks, water and drainage, digital, community centres, places of worship, cemeteries and crematoria, libraries, retail including local healthier food outlets, markets, pubs, restaurants and cafes, banks, community growing space, green space, play and sports facilities and public toilets. During the passage of the Planning (Scotland) Act 2019, the Scottish Parliament emphasised the importance of planning these services, infrastructure and facilities for communities across Scotland. 20 minute neighbourhoods are a great opportunity to embed where appropriate, an infrastructure-first approach to our future places.

NPF4 will help to prioritise the infrastructure investment needed for people to live better, and more locally, in the future. By taking an infrastructure-first approach to planning future development, we will be able to reduce the need to travel and minimise spend on additional transport infrastructure construction, contributing to an overall reduction in emissions from the transport sector. We will link with infrastructure

plans to encourage place-based investment in local infrastructure to work alongside planned future housing developments. We will reflect and embed travel and investment hierarchies as set out in the Infrastructure Investment Plan and National Transport Strategy 2 within the appraisal and assessment of potential development options to inform the spatial strategy from the outset.

We will also explore the types of community services that will be required in the future, such as hubs for remote working and shared facilities, co-location and future-proofing. Natural (blue and green) infrastructure will be an integral part of a strategy for people, rather than an afterthought, helping to achieve multiple benefits for nature, communities and businesses.

The detailed consideration of infrastructure and service provision and implications are central to the preparation of spatial strategies and future land use decisions. Development plans can help to ensure the right infrastructure and services are in place at the right time to serve the needs of communities. We expect that the new requirement for an evidence report, examined through a 'gatecheck' early in the plan preparation process, will help to achieve this.

As part of the ongoing planning reform programme, we are carrying out a review of existing developer contributions mechanisms such as planning obligations. This was one of the recommendations made last year by the Scottish Land Commission in their advice to Scottish Ministers on land value uplift capture. The review will evaluate the effectiveness of planning obligations as a means of securing timely contributions to – and delivery of – the infrastructure and affordable housing that are necessary to create high quality places. This will help to inform NPF4's approach to infrastructure funding and delivery. We will also align with our Capital Investment Plan in terms of the role of private capital in developing sites of strategic importance to Scotland.

## Enhance and expand natural infrastructure

Our strategy will enhance and promote open and green spaces and green networks as an integral part of successful place-making. By bringing together green and blue infrastructure, we will modernise our existing policies to ensure that our natural networks are nurtured and expanded to support our health and wellbeing, and contribute to our climate and biodiversity goals. We are aiming to strengthen our policy so that blue and green infrastructure are not an added benefit but an integrated requirement for future planning and development. For example, there is scope for new policies for planning green spaces and play. We also expect that much can be learned from innovation in green infrastructure planning as demonstrated by the Glasgow and Clyde Valley Green Network Partnership and Central Scotland Green Network.

Blue and green infrastructure will be an essential part of our approach to building our long term resilience to climate change and can also contribute to reducing emissions and carbon sequestration. In particular, opportunities for natural infrastructure to address the long term risk of flooding, water and drainage issues, temperature management and everyday livability of places will inform our approach to planning and enhancing our spaces and places. As part of this, consideration will also be given to the integration of ecological networks to protect and restore biodiversity and ensure that habitats and species can adapt to a changing climate.

## Achieve more sustainable travel

We will refocus our existing transport policies to specifically draw out how land use planning can build in sustainable travel choices. Scotland's second National Transport Strategy<sup>21</sup> set out a vision for a sustainable, inclusive, safe and accessible transport system, helping to deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors. NPF4 is being prepared alongside the second Strategic Transport Projects Review and we expect, in time, that future Regional Spatial Strategies will align with Regional Transport Strategies. The Active Scotland Delivery Plan; the 2030 Vision for Active Travel; and the Active Travel Framework<sup>22</sup> also provide an important policy framework for NPF4 to align with.

By guiding development to the right locations, we can reduce the need to travel unsustainably. To achieve stronger local communities and reduce emissions that are harmful to the environment and our health, and in line with the NTS2 sustainable travel hierarchy, there will need to continue to be a sustained and significant shift away from use of the private car towards walking, wheeling, cycling, public transport, taxis and shared transport. This will need to be embedded in the land use decision making process and will require policies that can be directly and consistently applied, to avoid compromising on our climate change and health objectives.

We will consider whether proposed national developments can help us to deliver on this vision. The full list of proposals we have received is available to view at [www.transformingplanning.scot](http://www.transformingplanning.scot) and includes, for example: regeneration projects; large mixed use developments; settlement expansions; housing proposals; rural development projects; community-led development; social infrastructure; flood protection; natural infrastructure; and active travel networks. We will also consider whether this would help to deliver proposals that emerge from the Strategic Transport Projects Review 2.

# Potential policy changes

We are currently considering the following priority policy changes to support a spatial strategy for resilient communities:

- Promoting innovative place-based solutions to reflect a new approach to localism, including 20 minute neighbourhoods, an infrastructure-first approach and a move towards more mixed land uses to improve local areas. A stronger focus on place-based actions will also help us to adapt to long-term climate change.
- Introducing an overarching principal policy that puts the needs of people and their health and wellbeing at the heart of the planning system; encouraging people to engage with decisions about their communities, providing for a more joined-up, collaborative, and participative approach, achieving better outcomes for everyone by enabling communities to shape their own places.
- Minimising and mitigating environmental hazards and pollution, and embedding an evidence-based approach to the avoidance and alleviation of health impacts from new development. We will also include new policies to improve air quality alongside reducing climate change emissions.
- 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.
- Promoting places which create the conditions for healthier, more sustainable living, including by addressing the links between planning, transport, place, food and drink and other lifestyle choices, and the retail environment.
- Refocusing our policies on housing on quality and place, and linking with wider housing investment so that the needs of everyone, including older people and disabled people, can be met. We expect to strengthen requirements for affordable housing provision and include policies that help to diversify delivery and reflect the future needs and aspirations of communities.
- Replacing the current focus on maintaining a 5 year supply of effective housing land with a longer term perspective so that future plans can promote immediate deliverability and viability, but also proactively steer development to appropriate locations in line with the plan's spatial strategy, informed by an infrastructure-first approach. We could seek to monitor the pace of land take-up through completions and to trigger the release of additional land, in line with the development plan, when the need for additional capacity is clearly demonstrated. Housing Land Audits will help us understand programming and we are considering how they can be clearer and more consistent.
- Proactively bringing forward good opportunities for quality homes in places that would benefit from them, including town centres, remote rural and island communities, vacant and derelict land and adaptation and re-use of disused properties. An infrastructure-first approach should be an integral part of site selection to assist with development viability and minimise the need for the construction of new infrastructure and its associated costs to the public and private sectors.

- Promoting self and custom build/self-provided housing, co-housing and other innovative approaches to delivery, also linking with the potential for Masterplan Consent Areas. This will link with the new requirement to prepare and maintain a list of people interested in self-build introduced by the Planning (Scotland) Act 2019. We will also support purpose-built build to rent homes in contributing to meeting need and demand.
- Providing a consistent national planning policy that proactively addresses the comprehensive evidence on the needs of the Gypsy/Traveller population. This could include criteria against which ad-hoc proposals for public or private permanent sites or temporary transit sites can be assessed. We will also address the specific accommodation needs of Scottish Showpeople.
- Setting out clearer requirements for infrastructure to support developments and more proactively considering how it will be delivered. We will explore the level of service provision that can reasonably be expected by communities where development takes place, particularly for health and education. New policies will provide a framework for taking into account the impacts of proposed new development on infrastructure, including by prioritising areas where there is existing capacity. This will be supported by a clearer and more consistent framework for developer contributions.
- Ensuring well-designed, high quality provision and long term maintenance of natural infrastructure in new development, recognising its contribution to goals for climate change mitigation and adaptation, biodiversity and health and wellbeing, including clean air, place-making and community resilience.
- Promoting multifunctional blue and green networks, accessible to all, supporting active travel, recreation and habitat connections for nature. Our policies will also focus on the quality, functionality, usability, accessibility, inclusiveness, and future maintenance of green space. We will plan for allotments and community growing spaces given their benefits for health and wellbeing, community and quality of life.
- We will introduce a new policy to address play and playability, covering both informal and formal play and considering spatial opportunities for play as part of wider place planning.
- Promoting natural flood risk management and strengthening our policies on the water environment and drainage infrastructure to address the future impacts of climate change to build the resilience of our communities.
- Reducing the need to travel unsustainably by embedding the Sustainable Travel and Investment Hierarchies into decisions about locations for change. This should guide development to places which can currently be sustainably accessed, or have the ability to become so, with minimal cost to the public and private sectors arising from the need to subsidise public transport or invest in new infrastructure resulting from the need to rely on the private car. We will consider the accessibility and needs of different groups – for example of children and young people in accessing schools and opportunities for play.
- Restricting development in flood risk areas that generate the need for additional flood risk management measures and which put pressure on drainage systems.
- Align with our Capital Investment Plan in terms of the role of private capital in developing sites of strategic importance to Scotland.

# A Plan for a Wellbeing Economy



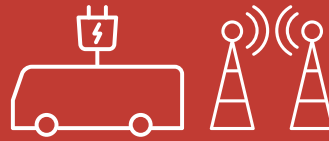
We will create healthier, fairer and more prosperous places and ensure future development contributes to a green, sustainable, and inclusive economic recovery.



We will support development in the parts of Scotland where quality jobs and investment are most needed. Policies will refocus on community wealth building and sustainability.



We will identify and support development that works with our assets, key sites and opportunities for strategic investment.



We will support development that helps to maintain and strengthen strategic transport and digital connectivity.



We will take a flexible and enabling approach to future business and employment uses.

## You told us...

- Planning must do all it can to support our green recovery and long-term economic priorities.
- The future needs of businesses and investors cannot be fully predicted, and so our proposals and policies must be flexible.
- Planning can proactively enable the future development of Scotland's food and drink sector, a key contributor to our economy as a whole. People want planning to say more about the value of productive land and to help the aquaculture industry to fulfil its potential in a sustainable way.
- There is a need for a managed approach to tourism, which helps to realise the significant potential for the sector whilst managing its impacts on quality of life, including in both urban and rural communities.
- The benefits of the historic environment, culture, the arts and the creative industries for our collective identity and economy should be recognised. Culture and creativity can also be a catalyst for regeneration and town centre vibrancy and strengthen our sense of place.
- Planning should enable energy from waste infrastructure, with a growing need arising from the forthcoming ban on landfilling of biodegradable municipal waste. Views vary on how the impacts should be managed, from policies to address specific impacts to a moratorium on new incinerators.
- Our approach to minerals should reflect wider government commitments on climate change and continue to protect communities from inappropriate development.
- Strategic transport connections will be essential, and there will be a need for infrastructure investment to support the transition to low carbon freight as well as lifeline links to our islands and remote communities.
- Improving digital connectivity continues to be essential. This is of critical importance to our rural areas, given its role in sustaining existing and future businesses and employment and supporting the wider objectives of rural repopulation and climate change mitigation. The latter stages of the early engagement were also an opportunity to reflect on the lessons learned from COVID-19, including home working, online learning, telehealth and online retail and leisure activities.



## Our new spatial strategy will:

### Support a sustainable and green economic recovery

Collaborative spatial planning at a national, regional and local scale, will help us to recover from the impacts of COVID-19 through a sustainable, green economic recovery, as recognised in the 2020 report by the Advisory Group on Economic Recovery. We have an opportunity to actively promote strategically important locations for future investment and business growth as part of a coherent vision for sustainable, inclusive growth.

Our policies on planning for business development will recognise the fundamental role Scotland's natural capital plays in supporting our economy and will aim to achieve sustainable, inclusive growth by protecting and investing in our natural assets and supporting the health and wellbeing of our communities. This will support Scotland's ambitions to build a wellbeing economy. Planning can enable sustainable, inclusive growth by attracting investment, sustaining future employment, restoring natural capital and seizing the new economic opportunities created by our transition to a net-zero, circular economy. Our natural assets can play a key role in securing our path to net-zero by 2045 and achieving the long-term vision of our Environment Strategy<sup>23</sup>.

Our strategy will be informed by emerging regional scale spatial and economic strategies which will align with city and regional growth deals and the work of Regional Economic Partnerships. For example, early thinking in Argyll and Bute indicates the significant potential for place-based approaches that unlock the potential for jobs that make use of the area's natural resources, such as aquaculture. Orkney's emerging spatial strategy sets out a strong vision for development that capitalises on the area's exceptional natural energy resources and marine connections, underpinned by an emphasis on innovation and research. Moray is exploring how its natural assets can help to build a place-based approach to future development and

investment in key sectors, such as the whisky and outdoor recreation industries. Community wealth building is also being explored at a regional scale, for example in an emerging regional spatial strategy for North, East and South Ayrshire which links with the area's growth deal and economic strategy and promotes place-based investment. Sustainable tourism is emerging as a key theme for regional spatial strategies to consider, including for the National Parks. Enabling business growth, alongside visitor management and low carbon accessibility are shared themes that can inform a national spatial strategy that will guide us to 2050.

### Reduce inequality and improve health and wellbeing

A shift from economic growth towards a wellbeing economy provides us with an opportunity to consider how development and investment can help us to address longstanding health and wellbeing inequalities.

Sustainable and inclusive growth will depend on a planned approach to ensure that development happens in locations that provide the greatest benefits for society as a whole. Economic performance and access to employment vary across Scotland and spatial planning has the potential to close the gap between the highest and lowest performing areas by intervening to create opportunities which are accessible to everyone. The spatial strategy will need to consider where we want to target future investment, and the land and premises required to support the sectors that we expect to grow in the future.

We will continue to actively enable investment in sustainable locations across Scotland – both urban and rural – including key investment sites and strategic opportunities for Scotland to attract international investment. Our approach will aim to strengthen the economy of our diverse cities and towns, and enable development that supports a vibrant rural economy. In the past, industrial and business areas have tended to be located at a distance from residential areas. As our economy continues to evolve, there may



be scope for greater integration of work and living as inter-related land uses. The climate change agenda may benefit from a strategy that broadens choice and flexibility, for example through the provision of community hubs and flexible workspaces. These types of initiatives could complement other strategies such as revitalising our town and community centres and helping to create footfall that supports local traders.

This strategic approach to future investment and infrastructure will be brought together with our other aims of localism and quality of place to provide a coherent spatial vision for Scotland as a whole. We may need to make choices to ensure that all areas play to their strengths with complementary, rather than competing proposals. Digital infrastructure, remote working and our current re-evaluation of the future working environment are expected to feature in a new approach to planning the distribution of our future jobs.

### **Provide certainty and flexibility to encourage investment**

Planning can stimulate investment and growth by providing certainty. At the same time, recent months have shown that our planning policies must be flexible enough to respond to rapid and significant economic and social change. Whilst many of our existing policies on business and employment remain relevant, we can improve on them so that they reflect our aspirations for a wellbeing economy.

We will consider how this can be supported by local development planning which is underpinned by a stronger evidence base at the local level for local land use decisions. We will review the role of business land audits and consider the extent to which they link with local economic strategies. We will also explore whether the resilience of investment sites would benefit from fuller risk assessments to help business adapt to the impacts of climate change.

### **Grow our food and drink sector**

Planning can support our internationally renowned food and drink sector by protecting our natural assets that underpin production and facilitating the development of production and processing facilities.

This includes fishing and aquaculture, farming, food and beverage manufacturing. It is significant for employment in the islands and accounts for a high proportion of employment across rural Scotland. Our current policies recognise the importance of high quality agricultural land but there is scope to more fully reflect the importance of land as a finite resource that delivers many benefits for society. Wider policies will inform our approach. For example, the Land Use Strategy sets out that where land is highly suitable for a primary use this should be recognised in decision making so that multiple benefits can be secured. Links with our rural policies, flood management, water catchment management and carbon storage will also be important.

We will look to enable the sustainable growth of the finfish and shellfish sectors, including by guiding new development to coastal locations that reflect industry needs and take into account wider marine planning. Scottish aquaculture and its wider supply chain is of particular significance for some of our most remote rural communities. Farmed salmon has one of the lowest carbon footprints by production of health protein foods. The industry's growth strategy for 2030 aims to double the economic contribution of the sector to £3.6 billion and double the sector's jobs to 18,000. The Scottish Government continues to work with the Aquaculture Industry Leadership Group to achieve this.

### Support sustainable tourism development

Our strategy and supporting policies will include a renewed focus on enabling sustainable development that helps to strengthen and grow our tourism sector.

Tourism plays a major role in our economy – in 2018, spending by overnight tourists and day visitors in Scotland was around £10.4 billion. This generated around £12 billion of economic activity in the wider Scottish economy and contributed around £7 billion to Scottish GDP. The Sector also employed 218,000 people accounting for 1 in 12 jobs in Scotland.

The sector has been significantly impacted by the pandemic. The Scottish Tourism Emergency Recovery Group, and now the Tourism Recovery Taskforce has provided a partnership-driven response. The Taskforce report focuses on recovery, investment and stimulating demand. Whilst overall levels of employment in Scottish tourism are highest in Edinburgh and Glasgow, as a proportion of all jobs tourism is of particular significance in rural areas such as Argyll and Bute and Highland. Tourism will have to continue to adapt to further influences including climate change and its impact on travel, and the economic challenges ahead. NPF4 will reflect the priorities set out in our Tourism Strategy.

Our many great places and exceptional natural environment, landscapes and wildlife are assets that the sector depends on, and so a sustainable, planned approach to future development will help to ensure the long term future of the industry. Destinations such as island and rural locations often have a 'carrying capacity' that is placed under threat by the influx of large tourism numbers. Consequent impacts on the environment and communities have to be managed, through visitor management facilities, investment in appropriate infrastructure or by striking the right balance between tourism accommodation and maintaining an adequate housing supply to support and retain the existing population. Temporary accommodation for the sector's workforce in rural areas is often a challenge that can be addressed by positive planning policies.

### Stimulate culture and the creative industries

We will recognise the importance of creativity, culture and the arts to our collective identity and future places. Culture defines our diverse places and many of our buildings reflect our architectural, social and economic history that contributes to part of our sense of wellbeing, heritage and economy. Regeneration and development has used culture and creativity to inspire new futures, from Dundee Waterfront where the V&A has helped to transform the city centre, to Paisley where creativity has been used to stimulate a new future for the area. Despite this, culture has not featured prominently in our suite of national planning policies to date and there is significant scope to improve on this in NPF4.

Scotland's Culture Strategy<sup>24</sup> sets out a vision for strengthening and transforming culture, and using it to empower communities as well as individual lives. The strategy aims to ensure that culture is embedded into all policies, so that its transformative potential can be fully realised. It outlines the significance of the creative industries as our second fastest growing sector that accounts for 3.3% of employment in Scotland and is made up of numerous small businesses.

### Transition to a circular economy

We will update our policies on zero waste to reflect the new opportunities arising from a shift towards a circular economy. Planning can support development which reflects the waste hierarchy, prioritising the reduction and re-use of materials, and facilitate the delivery of new infrastructure required to achieve this. Our policy on this was updated in 2016<sup>25</sup> and the Climate Change Plan and emissions reduction targets are relevant, together with the more detailed policies including the forthcoming ban on landfilling of biodegradable municipal waste. At a European level, the European Commission also launched a Circular Economy Action Plan<sup>26</sup> in March 2020, which aims to mainstream and support action in this area, including in relation to buildings and construction.

Minimising construction waste and promoting the sustainable use of the existing built environment has an important role to play as part of this.

Infrastructure to support the circular economy, including for collecting, sorting, processing and re-manufacturing materials, that can help reduce the demand on primary sources of materials, will also need to be considered. This might take the form of increasing capacity at existing sites or the provision of new sites and there will be choices to be made on opportunities for example for co-location of facilities.

### **Promote sustainable resource management**

Our spatial strategy and supporting policies will continue to set out proposals and policies that safeguard workable mineral resources whilst ensuring demand for primary materials, where required, can be met in a safe and acceptable way, including continuing to safeguard air quality. The substantial decline in the demand for coal for energy production, suggests there is also an opportunity to review our policy approach for this sector.

Peatland also has a critical role to play as a nature-based solution in supporting our climate change targets as well as providing many other long term benefits, and so our strategy and policies will help support both the phasing out of the use of horticultural peat and our investment in the restoration of peatlands. We will also consider how we can restrict further development on peatland given its role in carbon sequestration.

We have already committed to including our policy position<sup>27</sup> on unconventional oil and gas in our draft NPF4. This is currently contained in a Statement of 3 October 2019 and sets out that the Scottish Government does not support the development of unconventional oil and gas in Scotland. This means development connected to the onshore exploration, appraisal or production of coal bed methane or shale oil or shale gas using unconventional oil and gas extraction techniques, including hydraulic fracturing and dewatering for coal bed methane.

### **Secure strategic transport connectivity**

Our spatial strategy will work with, and plan for, our future strategic transport network. Connectivity, physical and virtual, is essential for inclusive growth. National Planning Framework 3 identifies key connections including airports, high speed rail, long distance walking and cycling routes and some freight facilities as national developments. The National Transport Strategy and Scotland's Economic Strategy recognise the importance of strategic transport connections, links and gateways. Brexit will heighten the importance of connectivity with external markets in the future.

Our new strategy will inform, and be informed by, the second Strategic Transport Projects Review, identifying key transport hubs and intermodal nodes that support connections within Scotland and with the wider world. We recognise the importance of long-term strategic road, rail, air and sea networks and will consider their role in relation to health and quality of life for their neighbouring communities.

There are plans to decarbonise Scotland's passenger railways by 2035, scheduled flights within Scotland by 2040 and an ambition to phase out the need for new petrol and diesel cars and vans by 2032, with public bodies taking the lead to phase these out from 2025. We will also ensure that rural and island communities can travel sustainably to access the services they need where those are not provided locally.

The new technologies which are emerging to make vehicles less dependent on fossil fuels will contribute to achieving the net-zero target. However, that will not be enough. We will not plan infrastructure to cater for forecast unconstrained increases in traffic volumes. Instead, we will manage demand and reduce the need to travel by unsustainable modes. Not taking steps to effectively manage demand for car use is no longer an option and our approach will focus on encouraging people not to make unnecessary journeys. Some of our existing infrastructure will need to be adapted for anticipated climate change that may make their location more vulnerable to erosion, flooding, land instability or heat for example.

Freight also has strategic transport needs and it may be that larger settlements, towns and cities require to identify land where distribution centres can be located to enable long distance goods vehicles to be unloaded ahead of onward distribution by smaller and alternatively fuelled vehicles and cargo bikes. Consideration of the location of additional dedicated rest stops or services areas will also be needed.

Connectivity is emerging as a shared priority, and a challenge to be addressed across the range of spatial scales; from local, through regional to national – this is evident in the emerging regional spatial strategies. Whilst the importance of transport links is recognised, we will need to consider how strategies can take forward an infrastructure-first approach which minimises the need to travel. We will use existing infrastructure capacity to direct where growth can happen in a way that is consistent with the travel and infrastructure investment hierarchies.

### **Improve digital connectivity**

We will reflect future plans for investment in digital infrastructure and consider implications for our long-term spatial development. Our spatial strategy will continue to support the roll-out of digital infrastructure across Scotland. This will play a key role in maintaining and growing our communities in both urban and rural Scotland, and has potential to form the foundations of a new emphasis on localism.

Scotland's Digital Strategy<sup>28</sup> aims to stimulate innovation and investment in digital technologies and industries across Scotland. Connectivity has a central role to play in unlocking the potential of our places and the economy and in opening up more remote parts of Scotland for investment and community expansion. We have already created permitted development rights for digital infrastructure and recently consulted on proposals to expand these further. These proposed changes need to be delivered in a way that minimises the negative impacts on the natural and built environment and safeguards air safety. Physical distancing arising from COVID-19 has also demonstrated that the planning service is well-placed to drive forward digital engagement in planning and decision making, creating opportunities for a wider range of people to get involved in more strongly influencing the design of their places.

We will consider whether proposed national developments can help us to deliver on this vision. The full list of proposals we have received is available to view at [www.transformingplanning.scot](http://www.transformingplanning.scot) and includes, for example: business and industrial developments; strategic investment areas; energy parks; advanced manufacturing; spaceports; aquaculture hubs; food production projects; tourism projects and infrastructure; strategic transport interventions; and digital networks.

# Potential policy changes

We are currently considering the following priority policy changes to support a spatial strategy for a wellbeing economy:

- Promoting a place-based approach to investment across all development plans, in line with the Infrastructure Investment Plan, priorities of the Scottish National Investment Bank, and the recommendations of the Advisory Group on Economic Recovery.
- Explicitly supporting development that can demonstrate its contribution to a wellbeing economy and fair work. This could include, for example, the introduction of new requirements from investment to secure social and environmental value and the delivery of our Public Health priorities.
- Creating certainty for investors whilst providing flexibility to allow the planning system to respond more effectively to market opportunities.
- Facilitating new ways of working such as remote working, homeworking and community hubs, in line with our emphasis on localism and to help reduce demand for motorised travel.
- Ensuring that we reflect the vision, objectives and framework of Scotland's upcoming third Land Use Strategy. We will consider how spatial planning at regional and local scales can protect and enhance the multiple benefits that can be gained from our land including food production and access to local markets.
- Reflecting any development and infrastructure needs arising from changes to wider markets, linking with our proposals for strategic freight connectivity.
- Continuing to grow Scottish aquaculture in a way which balances production with environmental quality. This could include criteria for assessing aquaculture proposals that can be consistently applied and which are sufficiently flexible to respond to changes in practice.
- Revisiting the interface between terrestrial and marine planning to ensure our policy properly reflects more recent developments in marine planning and associated research and evidence.
- Encouraging the expansion of tourism and associated infrastructure in an inclusive and sustainable way to ensure local communities have a share in tourism benefits, and safeguard environmental and community assets. We will explore how relevant tourism management considerations can be built into decisions on future development – for example by supporting developments that redistribute tourist uses and alleviate pressure on the capacity of sensitive areas. We will also build on investment through the Rural Tourism Infrastructure Fund.
- Providing greater flexibility for housing development that provides accommodation for rural businesses.
- Tackling the impact of short term lets in pressured areas by providing a framework for decision making on planning applications.
- Actively enabling development that supports expansion of the creative sector.

- Reflecting the importance of cultural facilities in different types of places, such as city and town centres and more rural communities and to stimulate more creative approaches to place-making and regeneration, for example in temporary uses of vacant spaces or in animating public spaces.
- Protecting existing cultural assets from inappropriate development including through the Agent of Change principle.
- Promoting the broader circular economy agenda and considering how it can improve our approach to place-making more broadly, including by making best use of existing buildings, and by prioritising waste prevention through innovation in design and construction. We will also look to ensure that, where feasible, existing materials are salvaged and reused or recycled.
- Encourage new buildings to connect to existing heat networks where located in a Heat Network Zone, wherever feasible; and encouraging applications for energy from waste facilities to provide a connection to a heat network, taking into account the practical considerations involved.
- Enabling the development of future zero carbon infrastructure in a way that supports wider spatial objectives, including mixed use and sustainable connectivity. This could include larger scale facilities as well as small scale interventions to support communities and households to make the transition to a circular economy.
- Updating our policies on fossil fuel extraction to reflect our climate change objectives and wider energy policy. Policies will mitigate certain environmental and health effects of minerals developments. We will also reflect wider policies on unconventional oil and gas and fossil fuels and confirm that we do not support applications for planning permission for new commercial peat extraction for horticultural purposes.
- Supporting heat network opportunities that can safely utilise former deep mining areas.
- Reviewing our approach to calculating and maintaining a suitable landbank for aggregates that reflects the 10 year development planning timescale.
- Decarbonising our transport system in relation to car and light commercial vehicles, Scotland's passenger railways and scheduled flights within Scotland.
- Setting out the key considerations to be taken into account when considering proposals for strategic low carbon transport infrastructure and ensuring that local development plans factor in strategic transport connectivity as part of their spatial strategy.
- Supporting the roll-out of digital infrastructure across Scotland in a way which allows planning authorities to manage its impact. We will encourage the redevelopment of existing infrastructure, including retrofitting and shared use of facilities.
- Introducing stronger requirements for new housing and business developments to build in connectivity and connecting the planning of future development with existing and future digital infrastructure capacity.
- Providing a framework to manage the impacts of development on digital networks.
- A new values-led approach to Inward Investment that will focus our efforts to build a technologically enabled, net zero economy with the principles of fair work and sustainable, inclusive growth at its heart.

# A Plan for Better, Greener Places



We will support development that reflects the character and identity of our distinctive places and neighbourhoods, safeguards and restores our natural assets, and tackles geographic disadvantages including areas needing regeneration and promoting the re-use of vacant and derelict land and buildings.



We will build on the review of the Town Centres Action Plan, the Land Use Strategy and the Place Principle to ensure that our approach to development focuses more on place.



We will future-proof our natural and historic assets and coasts and work to restore the health and resilience of Scotland's ecosystems, so that our natural capital can further support our economy and our wellbeing.



We will include stronger and updated policies on design and place-making.



We will significantly enhance our policies on vacant and derelict land to encourage innovation and redevelopment and promote a brownfield-first approach to development.



Our policies on city and town centres and on the re-use of historic buildings will be broadened to better reflect a wider range of potential uses in anticipation of continuing change.



Our policies on rural development will positively encourage development that helps to repopulate and sustain rural areas and stimulate rural economic growth and sustainability.

## You told us...

- Good design should be required rather than optional. We should consider issues including density, building heights, diverse user needs and built form fully, whilst also allowing flexibility in response to the distinctive character of our places.
- Many of our existing policies on the natural environment are fit for purpose. Building on this, we need to go further in securing positive effects for biodiversity from development, helping to address the global challenge of biodiversity loss in line with the new statutory outcome for NPF4.
- There is support for a national nature/ecological network, and some people suggested that we review our policies on ancient woodlands, Ramsar Sites, and wild land. Other priorities raised include national parks and regional parks, soils, and woodland creation and protection.
- People value our historic buildings, places and landscapes and recognise their importance to our sense of place, common history and future wellbeing. Their interest extends beyond designated sites and buildings to include locally important assets such as traditional housing stock and local landmark buildings.
- The pace of change for town centres is accelerating, and we need planning to work with others to secure a strong future for them, including by moving beyond a focus on retail, to promote a wider range of uses. The engagement feedback also highlighted the different roles of town centres across the country, from rural towns to city regions.
- Our strategy should set out a new agenda for rural development, with flexible policies which reflect the diversity of Scotland. Active intervention is needed to tackle depopulation and the particular challenges for our most remote areas, along with careful consideration being given to further development in pressured and more accessible areas. By linking development with infrastructure investment, we will be able to unlock development across rural Scotland and ensure its long term economic and social sustainability.
- We can strengthen our approach to vacant and derelict land, given the development challenges and potential benefits for climate change and quality of life. Ideas include use of this land for renewable energy, green infrastructure/naturalisation, community growing or city farms, employment and investment and housing. There is support for stronger prioritisation of brownfield development over the release of greenfield land. Development viability and the use of delivery mechanisms to unlock brownfield land and redevelop buildings at risk are also key considerations.
- The spatial strategy and policies will need to consider the long term impacts of climate change on our coasts, and provide a framework for protecting coastal communities and assets. Key issues include flood risk management and coastal protection and the interface between planning on land and at sea is important.





## Our new spatial strategy will:

### Focus on place-based outcomes

The Place Principle<sup>29</sup> means that all action and investment should be place-based to secure multiple benefits. Our spatial strategy will focus on the qualities and character of our places. We want to ensure that all parts of Scotland play to their strengths to support our wider objectives of community resilience, inclusive growth and environmental sustainability. Our strategy will support existing successful places and reflect on those that have not served us well, by considering how Scotland's cities, towns, rural areas, coasts and islands work together to form a uniquely rich and diverse country where everyone benefits from our wealth of natural assets. We will also focus on opportunities for regeneration to ensure our most disadvantaged and fragile communities are prioritised for development and investment.

Climate change action needs to work with our places so that we can effectively focus on climate vulnerable communities and tailor action for a just transition that improves our neighbourhoods. We need to build the resilience of our infrastructure and lifeline links through adapting to the challenges around our changing climate, as well as our unique natural, coastal and historic environment assets. Protecting, restoring and enhancing our natural and cultural heritage should form the foundations of a place-based approach to our future development.

Regional spatial strategies are considering ways in which our land and natural assets can form the basis of a green recovery. The two national parks are exploring their contribution to the quality of life of people living across Scotland, and identifying priorities including affordable housing as key to unlocking their potential. Urban futures will also contribute to this. Emerging priorities from the Glasgow conurbation focus on unlocking the potential of land along the Clyde, across local authority boundaries, to attract investment, strengthen communities and improve the quality of our places. Addressing vacant and derelict land is a common theme across the emerging regional spatial strategies.

### Achieve higher quality design

We will promote the planning and development of healthier, inclusive, sustainable and well-designed places across Scotland. Good quality development will stand the test of time and provide much wider benefits for people's health, wellbeing, the economy and environment. The public realm, including the design, layout and accessibility of our streets and spaces, has an essential role in creating better places. We will build on the six qualities of successful places to maintain a cross-cutting policy on design and place-making. We will ensure that more specific sectoral or place-based policies incorporate design considerations that reflect the diverse needs and aspirations of people.

Many existing plans and strategies reflect the importance of design and place-making including Creating Places and the Place Standard.

### Re-imagine city and town centres

We will look at how our policies can help our city and town centres to respond to current and future challenges so that they can adapt and be vibrant, creative, enterprising and accessible places to live, work and visit.

Scotland's city and town centres were already facing significant challenges prior to the global pandemic. Our living and working patterns in recent months have raised further fundamental questions about their future and wider objectives including climate change and how community empowerment will influence how our town centres will evolve in the future. A new emphasis on localism raises opportunities for town centres that will require a planning policy response, building on our existing approach, to diversify and balance the use of land and buildings, provide services and activities for people of all ages, and stimulate new investment especially in the maintenance and re-use of existing buildings and infrastructure as part of a circular economy.

We will reflect on the Town Centre Action Plan, continue to embed the Town Centre First Principle in decision making and respond to the outcome of the ongoing review of the plan to ensure our policies help to create more vibrant, healthier inclusive and greener town centres. Greater consideration will be given to the provision of more good quality homes in town centres, with access to shops and facilities, which can bring life back into town centres and create good places to live including by making sustainable and efficient use of the existing building stock.

City and town centres have the potential to contribute a great deal to our response to climate change, and to meeting the future needs of our diverse population. By making better and more creative use of our settlement centres, we can significantly reduce the need to travel unsustainably whilst maintaining and enhancing the character and identity of our towns and cities to create vibrant places that meet our future needs. Although the approaches will vary to reflect local circumstances, we will highlight shared opportunities to reinvent town centres and strengthen our networks of settlements.

### **Re-use vacant and derelict land and empty buildings**

There is a clear case for acting now to prioritise the use of vacant and derelict land and properties. This has the potential to deliver significant benefits including sustainable, inclusive growth and reduced emissions as an integral part of our future sustainable and circular economy.

Scotland has too much vacant and derelict land – this is rightly regarded as unacceptable and an issue of national concern that needs to be urgently addressed. The consequences come at too high a price, directly impacting on health and blighting economic, social and environmental recovery. Vacant and derelict land introduces a level of redundancy that our society

can ill afford. Whether it is large scale long-term dereliction, or small scale short-term vacancy, we need to set out a stronger policy framework that will give confidence to communities and public and private sectors that vacant and derelict land represents an opportunity to stimulate a positive future whilst building on the legacy of the past.

Our national planning policies can complement wider work on vacant and derelict land. The Vacant and Derelict Land Taskforce has identified longstanding vacant and derelict sites which the planning system could play a role in bringing back into use and this is a key priority highlighted by the Scottish Land Commission which proposes this as a national priority for NPF to address, and the Vacant and Derelict Land Fund seeks to provide funding solutions to the issues.

We must change the perception of vacant and derelict land from being a liability to becoming an asset. We could do much to inspire innovation and imagination in considering how we can achieve this. The strategy can set out spatial priorities and opportunities that help to guide future investment.

The relationship between town centres and suburbs and the role of the green belt will also benefit from a long term spatial perspective that reflects our net-zero and environmental ambitions. We will develop a vision for the future use of vacant and derelict land so that regional strategies and local development plans can work collectively to unlock the potential of land within our existing settlements to provide multiple benefits. Supporting this, stronger policies to limit greenfield development and recognise the potential for green belts to form a part of multifunctional green networks could help to achieve positive effects for biodiversity whilst also helping to realise the health and climate benefits of growth within existing urban areas.

## Actively promote working and living in rural Scotland and the islands

The issues arising from COVID-19 and future impacts of Brexit mean that the time is right for a fundamental rethink on how we can support a positive future for rural Scotland. Development planning in Scotland is now required by the Planning (Scotland) Act 2019 to contribute to increasing the population of rural Scotland, particularly in depopulated areas. Last year we commissioned research<sup>30</sup> to explore how future planning policy can support strong and vibrant rural communities and economies in the coming years, and identified scope for significant policy changes in NPF4. Our National Islands Plan<sup>31</sup> identifies how we can improve outcomes for our island communities and our approach will be informed by an island communities impact assessment.

We are currently exploring significant changes to our policies on rural and island development, to support prosperous and sustainable communities and businesses whilst protecting our unique natural assets. Our rural areas and islands are one of our greatest assets and our strategy will reflect our ambition to build low carbon rural communities where the quality of life is exceptional. We will identify opportunities to build the long term sustainability of our more fragile areas by highlighting infrastructure requirements and facilitating development that strengthens their future. While it is right that rural and island areas are developed in a different way to our urban centres, people still need to be able to access goods, services, healthcare, education, work and recreation in a fair, affordable and low carbon way for health and wellbeing. Access to low carbon heat options and water supplies are of critical importance for households that are not connected to wider networks. Local authorities have been working together to explore what low carbon rural living will look like in the future and this will inform a new national spatial strategy with supporting policies.

NPF4 will need to align with a wide range of policies relating to rural development including our National Islands Plan, Forestry Strategy, the Rural Economy Action Plan and the Land Rights and Responsibilities Statement. There are particular opportunities to link planning more closely to the Land Use Strategy and Regional Land Use Partnerships, to achieve an approach to future development at national, regional and local scales, that more fully supports, and is supported by, wider land use management.

Rural repopulation is a key theme for emerging regional spatial strategies including for the South of Scotland, Argyll and Bute, Western Isles, Orkney and Highland, where authorities are exploring how the areas' high quality of life and environment, growth of local economic development together with a growth in remote working can unlock new futures for rural communities and businesses. Emerging strategies are also exploring how the challenge of an ageing population can be addressed through long term planning.

## Protect and restore Scotland's natural environment

Our spatial strategy will strengthen our approach to protecting and restoring the health and quality of Scotland's natural environment. We will ensure that our approach to planning supports Scotland's role in responding to the twin global crises of biodiversity loss and climate change, including by strengthening policies designed to protect and restore Scotland's biodiversity and natural assets and to improve their long term resilience to the impacts of our changing climate.

Our national planning policies include measures to protect Scotland's unique natural environment, reflecting the hierarchy of natural heritage designations, from international networks to locally important landscapes and nature conservation sites. Building on this, we will strengthen policies to protect and restore

biodiversity and natural assets. For example, the Planning (Scotland) Act 2019 requires NPF4 to set out how development will contribute to securing positive effects for biodiversity and we are keen to build on existing good practice in Scotland and elsewhere. It also requires planning authorities to prepare Forestry and Woodland Strategies for their areas as a way of guiding future woodland creation and supporting the sustainable management of existing woodlands to increase the social, environmental and economic benefits they can deliver. We will look to align NPF4 with the vision and outcomes of Scotland's new Environment Strategy and the principles set out in the Land Use Strategy as well as considering the issues for the natural environment arising from the Climate Change Plan and Adaptation Strategy.

Our approach will recognise the fundamental role that a healthy and resilient natural environment plays in supporting Scotland's economy and the health and wellbeing of our communities. It will help to ensure that our natural assets are managed in a sustainable, regenerative way so they can continue to provide the benefits Scotland's people and businesses rely on.

### **Protect and enhance our historic buildings and places**

'Our Place in Time – the Historic Environment Strategy for Scotland'<sup>32</sup> sets out a vision for how we will care for, understand and promote access to our historic environment. It recognises the important contribution that historic sites and buildings make to communities across Scotland; promoting a sense of belonging and identity, encouraging civic participation and supporting local economies. Our policies for the historic environment will aim to respond to the outcomes and objectives of the Strategy.

Like our natural environment, our historic buildings and townscapes are key assets that contribute to our sense of belonging, economy and quality of life. Planning should provide

the framework in which change in the historic environment can be managed sensitively to preserve the special characteristics of our buildings and places, while also ensuring that we capitalise on the opportunities they offer. In doing so, we will acknowledge that the historic environment is itself an asset that can help us to deliver our wider policy ambitions for example, for mitigating climate change, improving health and providing housing.

Since NPF3 was adopted, Historic Environment Scotland (HES) has been established as our lead public body for the historic environment. In 2019, HES published Historic Environment Policy for Scotland (HEPS). We will consider our policies for the historic environment in relation to HEPS to ensure a consistent framework for decision making.

### **Adapt our coastline to the impacts of climate change**

We will consider how the future development of our coastal areas and communities can be achieved in a way that helps them adapt to long term challenges. Terrestrial and marine planning come together in our coastal areas, and NPF4 will align with Scotland's National Marine Plan as well as sectoral plans for offshore wind and aquaculture, emerging regional marine plans, plans for our ports and harbours and the Blue Economy Action Plan. The Scottish Crown Estate Act 2019 will also provide opportunities for coastal communities to benefit from their own assets, opening up new opportunities for strengthening their future.

We will consider whether proposed national developments can help us to deliver on this vision. The full list of proposals we have received is available to view at [www.transformingplanning.scot](http://www.transformingplanning.scot) and includes, for example: area-based environmental transformation projects; green and nature networks; town centres; regeneration projects; rural developments; and redevelopment of vacant and derelict land.

# Potential policy changes

We are currently considering the following priority policy changes to support a spatial strategy for better, greener places:

- Embedding the Place Principle throughout NPF4.
- Promoting the value of good design in creating great places. We will continue to reflect the 6 principles of successful places and consider the extent to which they can be developed further to reflect wider priorities, such as climate change, biodiversity and public health, including the health benefits from clean air and access to nature and quality green space. We will also consider scope to provide a framework for bringing forward Masterplan Consent Areas within this context.
- Embedding the use of the Place Standard Tool to reflect the importance of public involvement in a collaborative approach to place-making and the links between place, environment, health and wellbeing.
- Refreshing 'Designing Streets' to bring it up to date, clarify specific issues such as inclusive and sustainable design, and strengthen its applications, particularly in the context of 20 minute neighbourhoods.
- Broadening the mix of uses in town centres in the future. As part of this, we will look at how our policies can help to deliver the Town Centre First Principle and associated work on regeneration as a key contributor to achieving a new emphasis on localism and sustainability. We will promote new opportunities to increase town centre living, for example by stimulating the re-use of empty properties and gap sites and actively promoting homes for people of all ages, with greater recognition of the contribution these can make to housing requirements whilst following the agent of change principle. We will also look at how our policies can respond to current and future expected changes to the retail sector and harness the energy of the cultural heritage, historic environment and arts economy, including the evening/night time economy, to support town centre regeneration.
- Reconsidering the evidence, monitoring and appraisal required to inform spatial strategies in development plans, such as town centre health audits and strategies, transport and emissions modelling of land use options.
- Aligning the strategy with the Land Use Strategy and identifying opportunities to align emerging Regional Spatial Strategies with future Regional Land Use Partnership Frameworks.
- Prioritising the use of vacant and derelict land ahead of greenfield land through a 'brownfield first' approach. As part of this, we will consider the various definitions of vacant and derelict land, buildings at risk and their respective implications for planning policies.
- Strongly incentivising the imaginative and sustainable re-use of vacant and derelict land and buildings by highlighting the wide range of potential temporary and permanent uses it could support and providing a positive policy framework for achieving long term positive outcomes.

- Promoting a plan-led approach to re-use and remediation of sites, linking with wider delivery tools such as design briefs and local place plans. We will consider the evidence required to inform spatial strategies as part of this.
- Actively encouraging sustainable, innovative and low carbon development and re-use of existing buildings or vacant and derelict land.
- Tackling the challenges of viability arising for some types of development on vacant sites, by considering how plans can be supported by a wide range of delivery mechanisms. We will look at, for example, how we can promote proactive land assembly to enable the re-use of land and disused buildings.
- Updating our green belt policy to provide greater clarity on acceptable uses whilst also recognising its role as part of multifunctional natural infrastructure.
- Proactively rebuilding the resilience of rural communities and economies by enabling well designed, sustainable development. This will include policies to strongly support rural investment and diversification and enable the development of essential infrastructure for rural areas including affordable housing. As part of this we will take into account the specific circumstances of island communities.
- Strengthening the links between development proposals and wider sustainable land use objectives, contributing to the outcomes of Scotland's Environment Strategy. This includes reframing policy to reflect the fundamental role of our natural environment and biodiversity in providing essential natural services and benefits for our economy, health and wellbeing, and climate resilience. We will explore opportunities to ensure that our approach to using and managing natural assets is sustainable and regenerative, restoring and enhancing our stocks of natural capital.
- Strengthening the consideration given to the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions where peat and other carbon rich soils are present.
- Securing positive effects for biodiversity from new developments. We are developing ambitious new proposals which deliver positive outcomes for biodiversity from development without the need for overly complex metrics, and will consider how they can support wider approaches to natural infrastructure.
- Strengthening policy on woodland protection and creation in association with development, aligned with new provisions on forestry and woodland strategies.
- Clarifying our policies on locally important built and natural assets where required.
- Given the new requirements in the Planning (Scotland) Act 2019 to support the repopulation of rural Scotland, we will consider whether our policies on wild land need to change, while ensuring effective safeguards for our natural environment and landscapes.
- Maintaining, strengthening and clarifying our policies for the historic environment to ensure planning policies align with the vision set out in our Historic Environment Strategy and the operational policy framework in HES's Historic Environment Policy for Scotland.
- Enabling the continuing use, or re-use where appropriate of historic buildings given their importance in making sustainable use of embedded carbon as part of a circular economy.
- Considering whether Heritage Impact Assessments should be mandatory for all listed building and conservation area applications.
- Supporting development and infrastructure needed to realise the potential of the blue economy and coastal communities, including opportunities to enhance natural infrastructure. We will also factor in long term coastal vulnerability and resilience in order to future-proof development decisions.
- As part of delivery against the missions set for it, the Scottish National Investment Bank can support improving places and regeneration in order to reduce inequality, and improve opportunities and outcomes for people and communities through its investment activity.

# Delivery

An infrastructure-first approach to development will guide how we deliver our strategy.

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The Place Principle will help us to work together to deliver change that leads to better outcomes for our places. In line with the wider aims of planning reform, we will seek to strengthen public sector confidence in enabling development, and provide a clearer context for leveraging investment by the private sector.

Our strategy will be accompanied by a delivery programme that will form the basis of continuing collaboration to ensure it is effectively implemented.

We are currently working to strengthen links between development planning and future infrastructure investment. NPF4 is being prepared alongside a public consultation on our Draft Infrastructure Investment Plan for 2021/22 to 2025/26<sup>33</sup> and the second Strategic Transport Projects Review. As they evolve, our spatial strategy will ensure that a broader view of 'place' is built into these plans and that the priorities they identify for investment will inform where future development can take place. Our spatial strategy will build on our existing assets

and services, making best use of available capacity, ahead of requiring investment in new infrastructure. This aligns with the sustainable travel and investment hierarchies set out in our National Transport Strategy, and is an integral part of the proposed common investment hierarchy included in the Draft Infrastructure Investment Plan.

The Infrastructure Commission for Scotland<sup>34</sup> has made recommendations about NPF4 in relation to infrastructure. This includes putting in place an infrastructure-first approach to development planning, involving infrastructure providers, developers and other public bodies to ensure an integrated and coherent outcome-based approach to land use planning, and recognising the importance of implementation being supported at all scales. This approach is supported by responses to the early engagement, as many people have told us that they want to see a more strategic and joined-up approach to infrastructure investment to ensure delivery responds to our geographic strengths and challenges.

We are exploring the following opportunities for a collective approach to delivery, across the different scales of planning, to help achieve this:

- We will work with the national Infrastructure Delivery Group, involving the full range of public and private infrastructure delivery organisations, to consider the draft NPF4 as it emerges and identify how it can be supported by a delivery programme that relates to development planning at all scales. This type of improved collaboration with infrastructure providers will also play a key role in helping us to embed an infrastructure-first approach to planning and development within the context of the new system.
- We will continue to support planning authorities as they develop their early thinking on regional spatial strategies. We expect to broaden the conversation on this emerging thinking in the coming months and have published an update on progress alongside this Position Statement. Indicative strategies will continue to inform our national priorities. In turn, NPF4 can support the delivery of regional priorities by identifying significant place-based opportunities for infrastructure planning to reflect and respond to. Alignment with city and growth deals at this scale will also be critical to ensure that land use planning at a regional and national scale supports delivery of agreed priorities.
- We will also articulate how we expect an infrastructure-first approach to be embedded in the spatial strategies of local development plans. This includes ensuring that our plans are informed by evidence as recommended by the Infrastructure Commission for Scotland, focusing on need, demand, opportunities and geography. Part of this is the appropriate appraisal to determine the infrastructure requirements of potential spatial strategies at the start of the plan process, including who will fund and deliver it. This will ensure land use decisions are informed by these requirements rather than being developed after the land use decisions have been made. In the past this has led to sub-optimal infrastructure solutions that are not capable of being funded or delivered.
- Local place plans were also introduced by the Planning (Scotland) Act 2019, enabling communities to prepare plans for their own places. Community scale planning has an important role to play in the new system and we will consider its role in helping to deliver outcomes as we develop regulations and guidance alongside NPF4.
- We are carrying out a review of existing developer contributions mechanisms, such as planning obligations, which will inform our future policy approach. This includes not only NPF4, but also potential updates to Circular 3/2012 and implementation of the infrastructure levy, powers for which are contained in the Planning (Scotland) Act 2019. Subject to the findings of the review, we will explore how we can provide greater certainty, consistency and clarity around the scope and use of developer contributions, including to identify, fund and deliver infrastructure up-front. It will be important that any new approach is grounded in an understanding of development economics and delivery. For this reason we will consider the need for greater detail on the role of viability assessments in shaping both development plans and decision-making.



- Land assembly and compulsory purchase in our future planning system will also be considered. In particular, we will explore how future national planning policies could help to promote a more proactive and collaborative approach, and how such an approach can support planning and place-making objectives.
- Masterplan Consent Areas (MCA) will be a useful, proactive delivery tool to promote and incentivise investment in development, including new housing, and to support the delivery of local development plan strategies and particular local priorities. They will allow planning authorities to plan and enable delivery of quality development in their places; front-loading engagement, consideration of design, re-use of existing buildings, infrastructure and local assets at an earlier stage in the planning process and so placing authorities in a position of leading and enabling the planning of high quality places. Developed with community consultation, MCA schemes can be used to provide consent for specified types of development, subject to conditions in a particular area. They will be able to grant up-front consents for planned development, so adding certainty and removing much of the risk for potential investors, and supporting planned development and investment.

# Next steps

This position statement sets out our current thinking, drawing on the ideas and evidence we received from a broad range of people and organisations through our early engagement programme. We very much see this statement and any conversations that follow as an additional opportunity in the process, between our earlier Call for Ideas and the formal consultation with parliamentary process to come next year, to advance thinking towards the draft NPF4. Whilst we have intended that the Position Statement provides an idea of the direction of travel, there is still a lot of work to be done as we continue to shape and refine our thinking before we set out a full draft NPF4 for further consultation and scrutiny.

## Sharing your thoughts with us

We would welcome any thoughts on this position statement. We appreciate that stakeholders may not have much capacity to do so in the current climate, particularly if they have already shared ideas with us, and may prefer to reserve further input for the fuller consultation draft in autumn 2021. There will be no need to restate points made through the Call for Ideas process – we continue to use that evidence source as we take forward our policy development. We will continue to update our Programme for Engagement as work progresses towards a draft NPF4, ensuring opportunities for all to be involved.

**If you would like to comment now, we have set out these questions which will help to sense check the position statement.**

- 1. Do you agree with our current thinking on planning for net-zero emissions?**
- 2. Do you agree with our current thinking on planning for resilient communities?**
- 3. Do you agree with our current thinking on planning for a wellbeing economy?**
- 4. Do you agree with our current thinking on planning for better, greener places?**
- 5. Do you have further suggestions on how we can deliver our strategy?**
- 6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?**
- 7. Do you have any other comments on the content of the Position Statement?**

**Should you wish to comment, please can you do so by 19 February 2021 through the Scottish Government's consultation hub at <https://consult.gov.scot/planning-architecture/national-planning-framework-position-statement> or via email to [scotplan@gov.scot](mailto:scotplan@gov.scot)**

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W W W . G O V . S C O T

## Appendix 2

### Argyll and Bute Proposed Comments On NPF4 POSITION STATEMENT

#### Scottish Govt. Questions

#### Scottish Govt. Question 1: Do you agree with our current thinking on planning for net-zero emissions?

##### ***NPF4 Position Statement Proposes: 20 MINUTE NEIGHBOURHOODS***

**A&B Comment:** Whilst having some obvious logic in urban areas, in remote rural areas and islands it is likely to lead to strange attempts to squeeze proposals into its framework. Travel times are different in rural areas, partly due to longer distances, slower roads and infrastructure. There is a limit to what can be achieved by applying 20 minute neighbourhoods in Argyll & Bute. We have offered to be part of a pilot to explore this in more detail. Either the framework will need to be applied only in certain areas, very flexibly, or it should be broken down more into what is trying to be achieved.

##### ***NPF4 Position Statement Proposes: an emphasis on investing in development of vacant and derelict land.***

**A&B Comment:** Notwithstanding the above, one of the key opportunities to promote net zero emissions is reuse of existing buildings but there is no mention of investment in this area. In Argyll & Bute, the decaying urban fabric of our town centre buildings is a much more significant issue than vacant and derelict land and investment in the repair, reuse and repurposing of these buildings would have a potentially significant impact. It should also be noted that vacant and derelict land can also play a role in mitigating against the impacts of climate change through rewilding or creating water run off areas for example.

##### ***NPF4 Position Statement Proposes: Expecting low and zero carbon design and energy efficiency, for example by actively encouraging much wider use of sustainable and recycled materials in new developments; and significantly strengthening our policies to secure low carbon heating solutions.***

**A&B Comment:** Both these aims are to be encouraged, but must be pursued by coordinated action with Building Standards. It would be better if Planning requirements did NOT set a target or standards to be achieved (We are not the experts and don't have the resources to assess or monitor). These should be set by Building Standards which are designed for the purpose, and planning should cross refer to the latest standards thus always being up to date. Encouragement to exceed the standard is fine but no more than that, otherwise the building standard is not valid. It should be noted that the delivery of district heating systems is problematic in rural areas and that increasing emphasis needs to be made to make new properties highly energy efficient. Retrofitting existing properties through HEEPs for example to make them more energy efficient also has to be a priority given new housing stock is a small element of the overall housing stock in place.

##### ***NPF4 Position Statement Proposes: Supporting renewable energy developments, including the re-powering and extension of existing wind farms, new and replacement grid infrastructure, carbon capture and storage and hydrogen networks***

**A&B Comment:** Agree with this but it is important to also recognize the impacts of these types of development on local communities and the landscape. Development needs to be sustainable and there should also be greater emphasis placed on positive benefits for local

communities as a direct result of renewable energy developments. Examples include cheaper electricity costs, investment in local economic development and the wellbeing of local communities will become increasingly important.

***NPF4 Position Statement Proposes: Removing the need for planning permission for active travel and electric vehicle charging points to ensure that we can roll-out new infrastructure widely and quickly.***

**A&B Comment:** The main barrier to rolling out active travel routes or electric charging points is not planning it is usually permission from the landowner. Major active travel routes should still be required to go through the planning process in order to ensure communities have a say on routes and possible impacts on their property. Installation of “temporary” works without during the pandemic without any form of consent has caused wholesale problems in various areas. The installation of electric car points at a commercial scale should also be subject to planning control with exemptions made for smaller scale installations particularly for personal use.

***NPF4 Position Statement Proposes: We expect that NPF4 will confirm our view that the Global Climate Emergency should be a material consideration in considering applications for appropriately located***

**A&B Comment:** This needs to be very carefully worded. As a material consideration it could very easily outweigh any local issue or feature such as the amenity of someone's home, a protected landscape or place of historic significance for example.

### **Scottish Govt. Questions 2. Do you agree with our current thinking on planning for resilient communities?**

***NPF4 Position Statement Proposes: NPF4 will align with our vision for housing in 2040 and set out a long term view of the homes required to meet our future needs. We will focus on the location, quality and type of homes needed for people of all ages, reflecting long term population and household trends.***

**A&B Comment:** This approach would contradict the work of the Government's taskforce to deal with the consequences of population change in Scotland. In areas with projected falling populations such as Argyll and Bute we cannot use these trends to set out the number of new homes required or we will never reverse the trend as required in the planning legislation. We need to include some ambition in the targets to promote population growth. Lack of suitable housing is frequently cited both by people choosing not to move to remote areas, and people leaving.

***NPF4 Position Statement Proposes: In line with the recommendations of the Infrastructure Commission for Scotland, an infrastructure-first approach will play an essential role in ensuring allocated sites are a viable proposition to be built out in line with the plan's delivery programme.***

**A&B Comment:** Whilst laudable it needs to be applied carefully and with regard to different areas. In remote rural areas there is an ageing infrastructure with very little if any spare capacity. As a result new development requires new / upgraded infrastructure. At the same time in remote rural areas there is next to no mainstream speculative housing delivery and the only significant new build supply comes from RSL development. As a result the costs of any new infrastructure required needs to be covered from the public purse and it is planning

of this spend in a forward manner, plus inclusion of these costs within the accepted costs of RSL housing delivery grants that is required. There will be no significant if any cross subsidy from private sector.

***NPF4 Position Statement Proposes: During the passage of the Planning (Scotland) Act 2019, the Scottish Parliament emphasised the importance of planning these services, infrastructure and facilities for communities across Scotland. 20 minute neighbourhoods are a great opportunity to embed where appropriate, an infrastructure-first approach to our future places.***

**A&B Comment:** Caution needs to be applied, and locally specific applications are necessary as the level of services provided in remote rural areas necessarily cover much wider geographies not just in terms of distance but time also. This cannot be ignored.

***NPF4 Position Statement Proposes: The detailed consideration of infrastructure and service provision and implications are central to the preparation of spatial strategies and future land use decisions. Development plans can help to ensure the right infrastructure and services are in place at the right time to serve the needs of communities. We expect that the new requirement for an evidence report, examined through a 'gatecheck' early in the plan preparation process, will help to achieve this.***

**A&B Comment:** This will be very difficult to achieve meaningfully in practice unless there is a statutory alignment of how money is invested in infrastructure. Currently there is an issue of timing. If land is allocated for housing, Scottish Water will invest but the issue is how long that takes. We need a system of front ended strategic investment in new infrastructure capacity so that development can be brought forward in a planned and strategic manner following that investment, not piecemeal.

***NPF4 Position Statement Proposes: The review will evaluate the effectiveness of planning obligations as a means of securing timely contributions to – and delivery of – the infrastructure and affordable housing that are necessary to create high quality places. This will help to inform NPF4's approach to infrastructure funding and delivery.***

**A&B Comment:** In remote rural areas the financial fragility of development means that there is very limited opportunity to secure planning obligations to contribute to infrastructure provision. The reality is that public sector investment is required to deliver infrastructure and as such it makes sense for it to be delivered in a proactive and strategic manner.

**Scottish Govt Question 3. Do you agree with our current thinking on planning for a wellbeing economy?**

***NPF4 Position Statement Proposes: We will identify and support development that works with our assets, key sites and opportunities for strategic investment.***

**A&B Comment:** We would like to see the NPF4 identify the key growth areas of our iRSS as national developments as detailed in our answer to question 7 of this consultation, and the previously submitted Argyll and Bute iRSS.

***NPF4 Position Statement Proposes: Digital infrastructure, remote working and our current re-evaluation of the future working environment are expected to feature in a***



***new approach to planning the distribution of our future jobs.***

**A&B Comment:** Redistribution of public sector jobs to remote rural areas, shown possible by the last 12 months home working, will not only align with this sentiment, but make the most significant difference to achieving repopulation of rural area. It is a huge opportunity which is within the gift of the Government to do this now.

***NPF4 Position Statement Proposes: Our investment in the restoration of peatlands. We will also consider how we can restrict further development on peatland given its role in carbon sequestration.***

**A&B Comment:** The use of peat is a key ingredient of the whisky industry. This needs to be recognised and while it is accepted that we need to restrict development on peatland this could be a major barrier for places such as Argyll and Bute where much of our land is peatland including close to our Main Settlements. Any National policy document needs to take full account of this to ensure development in our area is not sterilised.

***NPF4 Position Statement Proposes: Some of our existing infrastructure will need to be adapted for anticipated climate change that may make their location more vulnerable to erosion, flooding land instability or heat for example.***

**A&B Comment:** Welcome this recognition and request clear support for identifying and delivering a permanent solution to Rest and Be Thankful. There is also a need to recognise further investment required in dealing with coastal flooding that affects many of our communities and key transport routes such as the A83 along much of its length and many parts of our local road system.

***NPF4 Position Statement Proposes: Connectivity has a central role to play in unlocking the potential of our places and the economy and in opening up more remote parts of Scotland for investment and community expansion.***

**A&B Comment:** This is welcome but this ambition will require significant levels of investment and potential subsidy in many parts of Argyll and Bute. For example, Oban is in need of significant infrastructure investment to help the port expand and to allow the town to continue to grow and expand in a sustainable manner. Digital connectivity also has a critical role here and this needs to be recognised by NPF4. Future development needs to be assured of access to modern fit for purpose digital infrastructure and this has to apply to rural areas as well as urban areas.

***NPF4 Position Statement Proposes: Tackling the impact of short term lets in pressured areas by providing a framework for decision making on planning applications.***

**A&B Comment:** This needs to reflect the different contexts of rural and urban areas where it might be applied. It is fully recognised the impact of short term lets on the local housing market can be negative in terms of housing supply. That said, they do perform a significant economic function in many of our rural areas. Very often these are small and fragile businesses so it is important that they are not overburdened in red tape and costs. The resources of LAs are also critical to this aspiration and enforce any future activity here.

***NPF4 Position Statement Proposes: We will look to enable the sustainable growth of the finfish and shellfish sectors, including by guiding new development to coastal locations that reflect industry needs and take into account wider marine planning. Scottish aquaculture and its wider supply chain is of particular significance for some***

***of our most remote rural communities. Farmed salmon has one of the lowest carbon footprints by production of health protein foods. The industry's growth strategy for 2030 aims to double the economic contribution of the sector to £3.6 billion and double the sector's jobs to 18,000. The Scottish Government continues to work with the Aquaculture Industry Leadership Group to achieve this.***

**A&B Comment:**

The sustainable development of this industry is critical to the future of rural Argyll and Bute particularly in rural and remote rural, including our island communities as stated above. To achieve the growth ambitions this will require a partnership approach across the sectors to maximise its potential and deal with its health challenges and lowering their carbon footprint. It should be noted the industry is changing rapidly with expansion on land and further out to sea together with the use of closed cage systems etc. and the NPF4 needs to recognise this. In addition, the expansion of aquaculture cannot be looked at in isolation and other things such as the availability of digital technology and access to affordable housing for workers will also be extremely important for future growth.

NPF4 also has to be aware of other aspects of aquaculture coming forward such as sustainable seaweed farming and algae production that will continue to grow in the decades ahead of us.

***NPF4 Position Statement Proposes: Continuing to grow Scottish aquaculture in a way which balances production with environmental quality. This could include criteria for assessing aquaculture proposals that can be consistently applied and which are sufficiently flexible to respond to changes in practice.***

**A&B Comment:**

The Scottish Government must be clear about any changes to current policy. The NPF4 will need to highlight issues from a planning perspective. These should provide detailed guidance for: incorporating risk-based spatial tools for wild fish interactions; regular net servicing and net changes (every 5 years max.); outline issues on aquaculture marine litter debris and develop an action plan; the condition of the seabed, and water quality surrounding finfish aquaculture farms.

The Scottish Government also need to confirm whether SEPA or Marine Scotland Science will be responsible for assessing the risk-based spatial tool for wild fish interactions in relation to the applicants' development proposals.

The NPF4 Spatial Strategy for aquaculture must be clear in stating what new criteria will be used to assess future aquaculture proposals and any changes in practices.

Adaptive management of wild fish interactions should be assessed and regulated by Marine Scotland Science and not through the planning system by way of an EMP. Best practice should dictate that an area-wide joint monitoring strategy be developed through NatureScot, SEPA, and Marine Scotland Science, which will work with developers to improve our understanding of the potential interactions between existing and proposed finfish aquaculture and the Atlantic salmon protected features throughout Argyll and Bute.

An acoustic tracking project to monitor the Atlantic salmon smolt migration pathways, and the use of hydrodynamic modelling to predict sea lice dispersal rates would prove useful in

developing an adaptive management strategy for wild fish interactions.

**Scottish Govt Question 4. Do you agree with our current thinking on planning for better, greener places?**

***NPF4 Position Statement Proposes: Re-use vacant and derelict land and empty buildings***

**A&B Comment:** This needs to be extended to include reuse / repurposing and renovation and redevelopment of under used, poorly maintained and/or derelict town centre buildings which are all too common in the peripheral small town centres of Argyll and Bute. This is particularly the case where property and rental values do not justify private expenditure and investment in maintaining buildings, many of which have no current viable use. This extends wider than just the provision of heritage grants and needs to be tackled on a national and more coordinated scale. A focus on the economic function of an area needs to be emphasised as having more well paid jobs and economic activity will help address this problem and at the same time counter the population drift from rural to larger urban settlements.

***NPF4 Position Statement Proposes: Our rural areas and islands are one of our greatest assets and our strategy will reflect our ambition to build low carbon rural communities where the quality of life is exceptional. We will identify opportunities to build the long term sustainability of our more fragile areas by highlighting infrastructure requirements and facilitating development that strengthens their future.***

**A&B Comment:** Agreed. It would be very helpful if the key growth areas of our iRSS are therefore recognised in NPF4 as national developments as detailed in answer to question 7 of this consultation.

***NPF4 Position Statement Proposes: Emerging strategies are also exploring how the challenge of an ageing population can be addressed through long term planning.***

**A&B Comment:** Linkage to the emerging national population strategy is key here. Its not just about long term planning, its also about a clear economic purpose, about identifying future investment opportunities, relocation of better paid jobs, delivery of critical economic and social infrastructure, construction of affordable housing, relocation incentives. These all require to be taken into account with a corresponding increase in resources to make real change happen.

***NPF4 Position Statement Proposes: Given the new requirements in the Planning (Scotland) Act 2019 to support the repopulation of rural Scotland, we will consider whether our policies on wild land need to change, while ensuring effective safeguards for our natural environment and landscapes***

**A&B Comment:** The number of people that would want to live in a designated wildland areas would be extremely small and the consequent benefit to re-populating rural areas would be insignificant.

We need to attract larger numbers of people, clustered around our established settlements where they can access the services people need and contribute to sustaining our existing communities that continue to lose population as services such as banks are centralised.

The integrity of the wildland areas is a hugely positive asset for Scotland and not worth degrading for the benefit of an extremely small number of potential housing developments. In Argyll and Bute for example it covers 12% of our total area within the Planning Authority boundary. There are no designated settlements in this land, little infrastructure, very sensitive habitats including peatlands, wetlands, Ancient Forests and consequently there would be very little benefit to growing our population if their protection was reduced through NPF4.

Wild land, given its scale, location and nature, is therefore not an obstacle to sustainable repopulation in Argyll and Bute and is functioning well in terms of its policy objectives. Repopulation can be achieved through the LDP, which promotes a sustainable, settlement strategy including a flexible countryside policy approach for the delivery of new homes in places where people want to live.

**Scottish Govt Question 5. Do you have further suggestions on how we can deliver our strategy?**

***NPF4 Position Statement Proposes: We will also articulate how we expect an infrastructure-first approach to be embedded in the spatial strategies of local development plans.***

**A&B Comment:** There is a need to reflect the different financial landscapes in rural and remote rural areas where the primary route for infrastructure is through the public sector. There is a need to see how the private sector can be better incentivised and/or rewarded to provide this infrastructure in rural areas such as Argyll and Bute.

**Scottish Govt Question 6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?**

**A&B Comment:** No.

**Scottish Govt Question 7. Do you have any other comments on the content of the Position Statement?**

***NPF4 Position Statement Proposes: We will consider whether proposed national developments can help us to deliver on this vision. The full list of proposals we have received includes, for example: carbon capture and storage infrastructure; on and offshore renewable energy generation and networks; clean hydrogen production and distribution; energy innovation zones; heat networks; and walking, wheeling and cycling infrastructure. regeneration projects; large mixed use developments; settlement expansions; housing proposals; rural development projects; community-led development; social infrastructure; flood protection; natural infrastructure; and active travel networks. business and industrial developments; strategic investment areas; energy parks; advanced manufacturing; spaceports; aquaculture hubs; food production projects; tourism projects and infrastructure; strategic transport interventions; and digital networks. area-based environmental transformation projects; green and nature networks; town centres; regeneration projects; rural developments; and redevelopment of vacant and derelict land.***

**A&B Comment:** Argyll and Bute submitted its iRSS to Scottish Government and would wish to see elements of that document identified within NPF4 as National Proposals or sites, not just on a spatial diagram. In particular, three major areas of existing growth potential are identified in Argyll and Bute's iRSS, and it is now crucial to capitalise on these opportunities

if we are to reverse population decline. These growth areas which should be identified by NPF4 are:

### **Tobermory-Oban-Dalmally Growth Corridor**

The Tobermory-Oban-Dalmally growth corridor is Argyll's only area of existing natural demographic growth. Oban plays a key role as a hub for tourism and nodal gateway to the islands for commerce, residents and tourists. The corridor has relatively good connectivity to both the central belt and the highlands and has a wide range of existing and potential employment opportunities.

### **Helensburgh and Lomond Growth Area**

Helensburgh and Lomond Growth Area has excellent connectivity to the central belt and beyond whilst still enjoying the high quality environment of the remainder of Argyll and Bute. Recent investment in private housing development is recognition of Helensburgh's potential as a commuter location for the Clyde Area via its rail and road links. In addition the development of HMNB Clyde as the UK's single base for submarine operations is seeing unprecedented levels of investment and development within the base and involving significant numbers of military and civilian staff and their families relocating to the Area. Both these developments represent huge opportunities to see new investment, new development and repopulation of the Helensburgh and Lomond Area that supports the emerging Clyde Mission Regeneration Project sponsored by the Scottish Government.

### **Argyll and Bute Western Seaboard**

Argyll and Bute's economy and population is intricately connected with its lengthy coastline and significant maritime activity. There are a multitude of opportunities in both emerging and existing marine activities such as: aquaculture, commercial fishing, sustainable seaweed farming, offshore renewables, marine tourism, other marine leisure and maritime scientific research. None of these activities are unique to Argyll and Bute, but their coalescence in the same single area is creating a critical mass of demand which requires a suitable on-shore support and service infrastructure to support and facilitate its continued development. This might be as wide ranging as further scientific research facilities at Scottish Association for Marine Science at Dunbeg (SAMS) and the European Marine Science Park, additional pontoons and landing facilities for leisure craft, deep water accessible laydown areas for storage and fabrication, and temporary / mobile accommodation for construction workers.

In order to achieve the overarching aim of reversing depopulation, targeted public infrastructure investment will be essential to support and facilitate the fruition of these three growth areas thus allowing private and public / private partnerships to develop viable projects in what are very often Very Remote Rural Areas. In order to maximise the chances of leveraging in this investment it is crucial that these growth areas are identified in the NPF4 if as is set out in the Position Statement, that will be the route for identifying areas for infrastructure investment. More detail on these three growth areas has already been submitted to Scottish Government within the Argyll and Bute iRSS