

**NATIONAL PLANNING
FRAMEWORK 4
RESPONSE TO CALL
FOR IDEAS**

NPF4 – Response to Call for Ideas

Climate Change

The Scottish Government has identified a commitment to ensuring that planning responds to the global climate emergency and we consider that there needs to be greater urgency around addressing the climate change issue. Our natural and built environment will need to adapt and deliver much more to help reduce carbon emissions. We therefore all need to consider what climate-friendly places will look like in the future and how they can be made more resilient to the long-term impacts of climate change.

As a starting point there should be a strong presumption in favour of climate mitigation schemes, particularly low cost options like woodland creation, which when it is “the right tree, in the right place” can provide multiple benefits including rural employment, long term economic benefits (timber) and public access for recreation, health and wellbeing.

In addition to the carbon value of the additional tree planting, is the second stage opportunity of locking up the carbon for longer by actually using local timber in construction and much more of it. Through improved placemaking guidance planning has the ability to also influence design requirements to reduce our reliance on imported timber thus helping to promote Scotland’s sawmills and timber frame industry further which provides more local jobs. At the same time penalties for the overuse of concrete which has comparatively significantly greater emissions could also be considered.

Linking development to the use of the UK’s Woodland Carbon Code method could be used as a mechanism to show the carbon benefit of a development particularly when there is some tree planting associated with a development. When tree planting is proposed various assumptions can be used (e.g. native broadleaved mix, management regime) and this can be run through the Woodland Carbon Code calculator. This will provide the tonnes of CO2 sequestered by the new woodland over a set time period. There is also an add on which gives some scoring on biodiversity improvements and wider public benefits that can be achieved. Both of these outputs would come from the Woodland Carbon Code, which is the recognised structure for reporting/trading carbon from woodlands in the UK.

NPF4 should therefore support projects that deliver significant environmental benefits both ecologically and from the wider health of the area, particularly where it can be shown that the climate benefits are able to offset otherwise intensive land uses.

In England a legal requirement for 10% net biodiversity gain on development sites over the course of their delivery is being introduced this year.

A similar proposal should be applied to developments across Scotland e.g. possibly starting with all major planning applications and then introduced on a phased basis for all development projects. This could be assessed on a percentage of the site area or the level of the quality of the improvements proposed.

Housing & Sustainable Growth

Scotland’s population is set to age considerably over the next 20 to 30 years, with the number of people over 75 increasing by 25% by 2041. At the same time, the number of children will fall by around 2% and the working age population will only increase by 1% over the same period. This creates significant challenges for existing and future service provision and how and where we plan and build in the future.

Planning therefore needs to consider how many and what type of homes, health care provision, education facilities will be needed and also how the Scottish Government’s stated aims of increasing the rural population and targeted rural repopulation can be achieved, as well as how all places could be made more inclusive, diverse, creative, vibrant, safe and empowering.

In a rural context, there is still likely to be a need to differentiate between different types of areas e.g. accessible rural areas, remote rural areas and island and sparsely populated areas. Planning should recognise and develop housing policies suited to those rural areas where housing can be a positive form of development and indeed this needs to be encouraged, given its significance to the wider rural economy and societal needs. Most local authorities have strict policies controlling or preventing rural development and therefore a national response set out in NPF4 that makes it easier and quicker to obtain planning permission for rural housing plots will not only help to bring more land to the market, but also meet the Government's stated aims for addressing many of the issues currently experienced in rural areas.

Opportunities to address climate change in rural areas cannot be underestimated, especially where they could support the rural economy and jobs. Existing and emerging renewables technologies, increased tree planting, land management for biodiversity or green tourism can all be areas of business growth and opportunity in the future.

Travel & Infrastructure

For the first time the strategy that is set out in NPF4 will be supported by a clear plan for delivery and it will be aligned with Scotland's Infrastructure Investment Plan and the Government's second Strategic Transport Projects Review. Consideration therefore needs to be given to what infrastructure will be required, how we can make better use of existing capacity (including through technological innovation), how digital connectivity could continue to change the way we live and work and what emerging and future technologies we will need to plan for over the next 30 years. The digital economy and increased options for remote working need to be positive across the whole of Scotland, not just in the urban areas.

Our experiences of large proportions of the population having to work from home through the ongoing Covid -19 crisis ought to assist in changing our previous 'normal' cultures and routine habits of the daily commute to and from work.

If air pollution is a major factor towards the number of premature deaths in Scotland, then a revolution in transport provision is a fundamental solution. The ongoing Covid -19 situation has already shown that a dramatic reduction in transport movements has resulted in significant improvements on air pollution hot spots across Scotland.

In urban areas locating new development close to public transport hubs or where good quality improvements to these connections can be realised should be the first choice. Only where all options have been considered should greenfield sites close to motorway links be considered.

Where new housing developments are proposed and especially where space is at a premium, dispensing with the apparent requirement for garages (which are rarely ever used for the purposes intended) and optimising actual living space would seem more sensible with a focus on provision of local transport network. As is already happening improvements to networks of footpaths and cycle routes can also be 'biodiversity paths' or green network corridors and provide positive placemaking that contributes to everyone's health and wellbeing.

Rather than being fixated by potential retail impact, if the planning system was to allow a greater range and coverage of local convenience stores across all communities, then it would not only reduce the need to travel distances for food shopping but would help to reduce the amount of people using comparable stores and thereby also assist with any ongoing and future social distancing rules.

Greater flexibility in the planning system to allow small scale businesses to be able to work from home and increased permitted development rights to make better use of home-working opportunities would also be beneficial.

One possible response to reducing commuting would be for NPF4 to include a statutory requirement for 'Climate First' travel plans – e.g. medium/ larger scale companies would have to set out how they enable flexible patterns of staff working/home working to reduce a percentage of daily commutes, decrease air pollution, reduce time wasted sitting in traffic jams, all with resulting positive impacts on productivity, mental health and wellbeing.

There is also no need for all employees to have individual allocated parking spaces. A reduction of available on-site car parking could help to 'force' companies to sanction a daily percentage of workforce to home work. Cycle parking spaces and cycle incentive schemes (e.g. grants to install cycle sheds and shower facilities) alongside new powers set out in the Transportation Act for local authorities to charge for staff parking spaces could assist with this aim.

Alternative modes of (EV/hydrogen) public transportation to the car should also be factored in. Our cycle lanes are still very poor in this country and developer contributions can help to play a part in improving the infrastructure but developers and builders can't be expected to continue to pay for everything particularly when the current scope and levels of contributions already varies so widely across Scotland. This therefore needs to be factored into the Infrastructure Investment Plan.

If significant reductions in car use could be achieved, then the greening of surplus car parking areas would result in significant net biodiversity gain particularly in urban areas. This would also provide valuable useable outside spaces for employees to be able to work or to take a break.

Design & Localism

Better designed homes to allow flexible work space and ensuring all new properties are built to be more "climate ready" and to the highest energy efficient standards should be incentivised through the planning system e.g. fast tracking of planning applications under delegated powers that deliver above the required standards.

Planning decisions should also pay greater attention and emphasis to local socio-economic factors including the use of local labour and materials in all new development – that would extend even to wind farm construction for example. Whilst not directly linked to net zero, it does impact on carbon reduction by reducing transportation and boosts local economies through supporting employment and businesses.

Increasing trust and use of local products, resources and materials rather than importing of labour and materials should also be set out in design statements or sustainability (net zero) statements during the planning application process.

Non-residential developments above a certain size should have to include a new renewable source of electricity supply (not just relying on PPAs but having something in that location).

The involvement of local communities in new schemes should continue to be at the heart of the planning process and encouragement given to increased collaboration and promoting the use of local skills and existing resources from within the community.



BIDWELLS