

National Planning Framework 4 – Call for Ideas

Background

The next significant stage in the implementation and consolidation of the Planning (Scotland) Act 2019 is the preparation of the next National Planning Framework, NPF4 combined with revised Scottish Planning Policy (SPP). Currently, Scotland's national planning policy is set out separately in Scottish Planning Policy (SPP), however this is now going to be incorporated into the NPF so spatial and thematic planning policies will be addressed in one place and will have statutory status. The combined NPF and Scottish Planning Policy will in effect be Government's Local Development Plan, and will look to Scotland in 2050.

The National Planning Framework (NPF) is the Scottish Government's statement of where development and infrastructure is needed in order to support sustainable and inclusive growth. It will guide spatial development, set out national policies, designate national developments and reflect regional spatial priorities.

Unlike previous NPFs, NPF4 will require approval from the Scottish Parliament. This will present opportunities to influence at a later date. Following the Call for Ideas, responses will be considered and a Draft NPF prepared. Following further consultation, this may be amended and a final version requiring to be approved by Parliament before it can be adopted by Scottish Ministers.

NPF4 will look very different from NPF3, with a longer time horizon to 2050, an increased regional focus and improved alignment of Planning with wider programmes and strategies, including infrastructure and economic investment, as well as identifying opportunities for strategic planning to contribute to achieving net zero carbon emissions and decarbonisation. It will become more mainstreamed in future planning and infrastructure projects and have an enhanced status as part of the statutory development plan.

Wide and effective partnership work with regional partnerships, Local Authorities, and the public, private and third sector will ensure that NPF4 can have direct targets and be more than just an infrastructure strategy. There is an opportunity for Local Government to shape NPF4 so that it can effectively address the national priorities of housing, re-population, health and wellbeing, carbon reduction, equalities and biodiversity.

Response

A number of issues require further detail to be worked out before meaningful comment can be made.

The majority of issues which officers would wish to comment on have already been discussed and recorded in forums such as HOPS and the RTP1 and it is not intended to repeat those here. We have had the opportunity to comment

on draft documents, and will make further representations following the publication of a Draft NPF4.

In particular, NPF4 will need to align with the outcomes in the National Performance Framework; respond to the shift to inclusive growth; improve health and well-being for the people of Scotland, improve equalities and eliminate discrimination and provide a spatial planning response to the Global climate emergency.

As technology advances, the speed of change increases, making it difficult to predict exactly what the world will look like in 2050. Flexibility, and the ability to react quickly and pragmatically to change, will therefore be key to ensuring that the planning system can act as enabler and innovator rather than regulator.

It would be helpful if more explicit links could be made both to and from other strategies where planning can contribute, including how planning is expected to contribute.

The opportunity exists to develop a Whole Systems Approach for Planning, and this could be the primary focus of NPF4. For Planning to be successful we need to work on this basis.

Separate submissions are being made on national development status for City Region Deals, development at Longannet, and associated infrastructure improvements, and in support of the continuation of the aims of the CSGN.

There are a few issues which we feel merit a response from a Clackmannanshire perspective, or are important to repeat, and these are detailed below.

1. What development will we need to address climate change?

Climate change and the pursuit of genuinely sustainable development should be front and centre of NPF4.

It is assumed that current references to the “...*requirement for new or upgraded efficient fossil fuel thermal generation capacity...*” will be removed from NPF. This will allow development plans to no longer safeguard fossil fuel deposits from sterilisation?

NPF 4 needs to emphasise the importance of renewable energy but also give support to local authorities on how to enable it through local and regional initiatives such as renewable energy masterplanning, demonstrating how this benefits the environment and the regional economy, and taking a long term view.

NPF4 could direct authorities to set energy targets, requiring local commitment to national targets. This would allow LDP policy formation and therefore planning application assessment to require developments to meet

targets or by developer contributions if they do not. Contributions could then be used by authorities to meet targets through other projects.

This approach would provide the flexibility of 10 year LDP policies not requiring specific infrastructure provision (e.g. specific numbers of EV charging points) that might be outdated very quickly in emerging shifts towards multiple technical solutions. Policy flexibility in NPF4 needs to direct focus towards all potential energy solutions, not just electricity, and require authorities to explore and embrace this.

New development accounts for a very small proportion of building stock, therefore finding ways to retro fitting efficiency measures for the existing building stock will be essential. In most cases is also more resource efficient to continue to use existing stock, rather than demolish and rebuild. Planning may be limited in its ability to contribute to this. We could consider things like insisting on retro-fitting where a building is being extended or adapted, or for other works that require planning permission as part of the conditions. Developer contributions or a similar mechanism could also be considered?

We may need to think beyond the current flood maps and plan not only to avoid identified areas that flood, but also create a buffer around these areas and allow or create areas which can and will flood, not only in extreme events, but at other times.

Buildings should be designed to minimise the amount of energy they need to heat and cool them and the aim should be not just to use only renewable energy, but to use it as efficiently as possible in every application.

2. How can planning best support our quality of life, health and wellbeing in the future?

Wherever people choose to live, it will be important that they can access services locally and reduce the need to travel. While electric/hydrogen vehicles powered by renewables will make travel less damaging to the environment, not everyone will have easy access to personal transport. Public transport should be invested in, with a suitable hierarchy and convenient multi-purpose nodes for changing transport types, i.e. from local small buses serving communities to rail halts or bus terminals for longer distance travel.

Wellbeing Economics

Health must be at or near the top of the priority list, taking account of countering the impact of the Big 3 - heart disease, cancer and stroke. Tackling related challenges such as obesity, respiratory illness, and an ageing population are also all relevant. In planning terms that might translate into a number of priorities, such as genuinely minimising greenfield development, taking traffic out of towns and cities, providing high quality, cheap and accessible public transport and active travel modes.

Clackmannanshire Council views the development of place as a key strategy in addressing priorities around health and wellbeing, poverty and inequality, an aging population and climate. It is working with colleagues from the Office of the Chief Economic Adviser to develop a 'Wellbeing Economy' pilot and is keen that place makes its contribution to this. The Council is already demonstrating its commitment to these approaches through multi-agency projects, working with A+DS and STP in Primrose Street, Alloa and in Alva. The Council is keen that NPF4 can enable this work and would be interested in exploring with SG colleagues ways that this could be achieved through a focus on wellbeing economics as one of Scotland's regeneration priorities. Clackmannanshire Council is well placed to contribute to this given our size, previous sustainability work and our experience of similar working other agencies.

Housing

There has to be a focus on better housing, perhaps focussing on refurbishment, adaptation and improvement of existing stock and associated community regeneration.

NPF4 is being positioned to give a stronger steer on housing delivery and diversification including the setting of targets on land for housing. This could remove the time consuming process of the inevitable debate over housing land supply and targets which forms a significant part of most LDP Examinations, however, it is an area where the exact mechanism requires detailed proposals to be presented for comment. The further division of the layers of the Planning system from National to Regional to Council to Local will mean that the issue of housing targets and provision of land for housing will require to be transparent and easily understood for all involved in Planning. Further details are awaited and will be commented on in due course.

Traditionally, although development plans have given indicative capacities for housing sites, based on the characteristics of the site and the surrounding area, it has generally been left to the developer of the site to identify the exact number of houses proposed and also the size of those houses.

This was on the basis that the developers knew what market they were appealing to and what that market wanted. In reality, this led to developments of mainly 3 and 4 bedroom houses.

Evidence from the Council's HNDA and from discussions within the communities has indicated that a far broader range of housing is required, including smaller housing and flatted developments.

These smaller homes tend to be at the cheaper end of the market, and developers may avoid building this type of house in Clackmannanshire, instead preferring to concentrate on larger (and more profitable?) houses. It may therefore be helpful if NPF4 could encourage and support the identification of ratios or percentages of different types and sizes of housing to

be identified on each site through development plans. This could be in the form of a percentage, with some flexibility (+ or - ?%) to allow for suitable layout and design solutions.

This would also move to more mixed, more inter-generational developments. NPF4 needs to address the issue of our ageing population generally but with a focus on how we can provide the right type of housing for them.

Town Centres

The health of towns is linked in with the above too. Re-purposing town centres by, for example, making them attractive places to live links in with all of the above. Maximising the potential of vacant properties must be part of this. That requires both a carrot and a stick in respect of how to approach inactive land and property owners.

Development in the Countryside

NPF4 is to “...provide a renewed focus on rural development including rural repopulation...”. While this may be a pragmatic approach in rural areas which have seen de-population, or where increasing the population would stimulate economic aims, in easily accessible rural areas such as Clackmannanshire, there are concerns that it would simply lead to ‘commuter’ housing in attractive areas of countryside. Issues with this would be the environmental impact of access and servicing these properties, as well as the visual impacts of urban development in the countryside, which would have the potential to be exacerbated in areas like Clackmannanshire where there is not a great deal of separation between existing settlements.

It is possible that this could be addressed at the Regional level.

Before considering the need for new settlements we should take a careful look at existing settlements which already have infrastructure in place. Could more use be made of under used buildings, particularly in town centres, are there opportunities for significant infill, or greater density developments. How can ‘unpopular’ areas be rejuvenated to attract investment? Having said that we may also need to be prepared to abandon existing areas due to impacts from climate change. Greater emphasis should be placed on the re-use of vacant and derelict land.

3. What does planning need to do to enable development & investment in our economy to benefit everyone?

There will be more home working, but also more collaboration over wider areas, nationally and internationally. This will require robust and easily accessible digital infrastructure not just in new developments, but in existing areas. As the pace of change increases the ability of this network to be easily and often upgraded should be a principal consideration and solutions other than burying services underground may be considered as alternative options.

Focussing investment on the cities network and city regions will have to be reviewed, with Regional Spatial Strategies becoming the new focus for regional investment, including economic and infrastructure.

NPF4 needs to state the importance of 5G technology being quickly rolled out across all areas, not just city centres where it is commercially viable now. Areas like Clackmannanshire with its areas of multiple deprivation need this as part of a wider regeneration package of measures which should also help support the rural economy and reduce the need for unnecessary travel.

4. How can planning improve, protect and strengthen the special character of our places?

It would initially be helpful to identify what vacant and derelict land would best be re-used for 'economic' purposes, and which might best be allowed to, or encouraged to return to nature, preferably with some positive outcome, e.g. leisure, recreation, flood alleviation, etc.

We should continue current initiatives to make them more mixed use and more vibrant and to see them as a neighbourhood rather than just a destination. This would encourage more residential use and use throughout the day and evening.

There is still a role for green belts, although they do not need to encircle settlements and can be in other forms such as green fingers or wedges. While the designation has previously been seen by many to be a presumption against development, some effort should be made to clarify what types of development may and may not be acceptable in green belts. It may be advantageous to identify the role of each individually identified piece of green belt, or finger or wedge, within development plans.

The principle of green networks especially where they form part of, or can be used to connect, active travel networks should continue to be given prominence in NPF4. Their contribution to successful places and health and wellbeing is significant.

5. What infrastructure do we need to plan and build to realise our long term aspirations?

Greater emphasis should be placed on infrastructure for public transport and it should be promoted as the transport option of choice, moving away from personal transport, however electric/hydrogen vehicle infrastructure also needs to be planned for as there will still be a need for private transport.

NPF4 needs to prioritise public transport in line with the NTS. However, there needs to be a focus on how people will be able to use public transport for multiple, short, close to home journeys needed to take children to school, nurse, go shopping, visit elderly relatives run errands etc. Public transport in the future, certainly within the next 10 years, needs to cater for these shorter

essential journeys. We can look to demand led public transport in other European countries for inspiration.

There is a need to discourage regular long distance commuting, which not only uses up resources, but can also affect quality of life by making people undertake long journeys on the majority of days. Encouraging people to work closer to home, or even in their own communities may engender a greater sense of local, civic pride, rather than people seeing their homes merely as a place to stay. With more time, and if based locally there would be the opportunity for more civic interaction which could result in a greater interest and pride in people's local area.

The future of aviation, and its ability to turn 'green' appears to be still very much evolving. There is likely to be more pressure to reduce air travel for environmental reasons. High speed rail links could be investigated.

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National Developments – Response Form

Please use the table below to let us know about projects you think may be suitable for national development status. You can also tell us your views on the existing national developments in National Planning Framework 3, referencing their name and number, and providing reasons as to why they should maintain their status. Please use a separate table for each project or development. **Please fill in a [Respondent Information Form](#) and return it with this form to scotplan@gov.scot.**

Name of proposed national development	Scotland's International Environment Centre (Clackmannanshire and Stirling City Region Deal)
Brief description of proposed national development	Development of Scotland's International Environment Centre in partnership with Stirling University and other partners and the creation of a larger supporting campus adjacent
Location of proposed national development (information in a GIS format is welcome if available)	Site to be determined in Clackmannanshire
What part or parts of the development requires planning permission or other consent?	Construction and servicing of the site/buildings, may be extraction of water for discharge to River Forth and potential for wildlife habitat creation and/or sustainable flood alleviation measures
When would the development be complete or operational?	In various phases from 2020 onwards
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	Yes

Contribution of proposed national development to the national development criteria (maximum 500 words):

The City Region Deal comprises a number of projects at different scales across the area, many of which have a direct link with Planning. In terms of the National Development Assessment Criteria, the largest project, to be located in Clackmannanshire is Scotland's International Environment Centre. At the forefront of Environmental Research, this facility will contribute to tackling climate change, support sustainability and quality of life and sustainable economic growth.

It will be a facility of national importance and focus, and will act as a catalyst for other related facilities to locate in the area. It should therefore be identified as a National Development in this increasingly important field.

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Name of proposed national development	Longannet site (Fife) and associated infrastructure improvements
Brief description of proposed national development	Implementation of economic development site at Longannet and associated regional transport improvements
Location of proposed national development (information in a GIS format is welcome if available)	Longannet (Fife) and road and rail access corridors
What part or parts of the development requires planning permission or other consent?	All other than permitted aspects of rail improvement works and potentially trunk road improvements
When would the development be complete or operational?	?
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	Yes

Contribution of proposed national development to the national development criteria (maximum 500 words):

The development would contribute to sustainable economic growth, re-providing jobs in an area recently affected by major job losses. It's location would allow for downstream and suppliers and companies to contribute, particularly if local infrastructure was to be improved as part of the development.

The opportunity exists to strengthen the existing rail network by extending the electrification of the rail line from Alloa to Longannet and beyond in future.

Associated roads infrastructure improvements would also ensure that this site, and other industrial legacy sites in the vicinity can be accessed easily and positively re-used.

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Name of proposed national development	Central Scotland Green Network
Brief description of proposed national development	Central Scotland Green Network
Location of proposed national development (information in a GIS format is welcome if available)	Central Scotland
What part or parts of the development requires planning permission or other consent?	Various
When would the development be complete or operational?	Ongoing
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	Yes
<p>Contribution of proposed national development to the national development criteria (maximum 500 words):</p> <p>Support the continued designation and development of the Central Scotland Green Network through NPF4.</p> <p>Encourage a whole systems approach to ensure that opportunities to enhance the network as part of other development or initiatives, both private and public, are not lost.</p>	