

National Planning Framework 4

Call for Ideas

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Highland Council Response to the Scottish Government National Planning Framework 4 (NPF4) Call For Ideas Consultation

This is the Highland Council's response to the Scottish Government's NPF4 Call for Ideas (CfI) engagement exercise. We understand that there are 3 elements to this stage of the consultation – candidate National Developments (cND), Policy Topics (PT) & the Housing Technical Discussion Paper (HTP). This submission relates specifically to the cND and PT and how these contribute to delivering our ambitious vision for Highland and, in turn, to national outcomes. Please note we are intending to respond on the HTP separately and that will follow in due course.

As we advance our indicative Regional Spatial Strategy (iRSS), for submission by the deadline at the end of June, we are developing an ambitious vision for Highland (see latest draft provided below) that sets the framework for development and investment. The key strands of this *emerging* vision run through all elements of our submission to CfI consultation and also ultimately our iRSS submission. For this CfI response we have utilised the questions posed through the NPF4 Transforming Planning engagement website to frame our comments and this acts as a pre-cursor to our forthcoming iRSS submission.

Under each question, we present the relevant aspects of Highland's emerging vision and how it aligns with and contributes to national outcomes; how our candidate National Developments fit within that vision and outcomes; and the most relevant policy topic responses (which are to follow).

We note Scottish Government will analyse all cND in relation to the following criteria:

- Climate Change: The development will help to reduce emissions, contributing to Scotland's target of net zero emissions by 2045, will be emissions neutral, or emissions negative;
- People: The development will support the health, wellbeing, sustainability, and quality of life of our current and future population;
- Inclusive Growth: The development will contribute to sustainable economic growth that helps to reduce poverty and inequality across Scotland;
- Place: The development will protect or enhance the quality of a place or improve biodiversity.

We note that whilst proposals should ideally contribute to all four criteria, developments that only meet two or three criteria may still be considered to be of national significance and potentially suitable for designation, for example where they will generate particularly significant benefits for one of the criteria. We are further aware that it is unlikely that proposals that have a significant adverse impact on any of these criteria will be suitable for national development status.

In addition, we observe that a National Development could be a single large scale project that makes a significant contribution to national outcomes, or a number of smaller projects that work together to deliver significant benefits or even a single small project that would have a nationally significant impact. Finally, we note that in order to ensure their status adds value, National Developments must have some aspect which requires permission or consent before construction begins.

With all of this in mind, this submission puts forward a suite of cND (compared to those in NPF3) that we consider to fully support these criteria and therefore represent important national development priorities. Further information on the proposals to assist Scottish Government's consideration of them will follow shortly.

The content of this submission has been jointly prepared by specialist staff, with some input from partner agencies and elected members. However, given the current COVID-19 situation, this has compromised the scale & breath of input so far achieved. The current situation is also understandably limiting some Council functions and, as such, this response is awaiting approval by our Members (by homologation) which will be done at the earliest relevant committee when they reconvene.

We are actively working on all the additional information indicated as 'to follow' and will provide this as soon as possible. The current situation surrounding COVID-19 and its likely long term social and economic impacts and our recovery should be fully considered as we contend that it is likely to influence NPF4 directly.

Our Emerging Vision for Highland in 2050

Our emerging vision for Highland is being considered through the iRSS and this sets an important context for the vital role that Highland will continue to play in contributing to national outcomes.

Our emerging vision for Highland by 2050 is to be an exemplar net zero carbon region which optimises its unique position in leading national emissions reduction targets whilst making best use of our land and water assets and our natural and heritage resources.

In the future, Highland communities will adapt to become locally resilient and self-supporting – in their access to housing, education, healthcare, work, food, energy, transport and leisure opportunities – and served by high quality physical and virtual connections. Our economy will adapt and prosper with a unique, unmatched environment in which to invest and one which sustains and grows local jobs and opportunities. This will bolster the Highland brand which will continue to attract a strong, sustainable and net-zero tourism industry.

In delivering this vision, we will bring our communities, partner agencies and communities with us, recognising the need for a just transition which is fair and equal.

NPF4 Transforming Planning Engagement Question Response

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

Highland Council acknowledges our changing climate and is already proactively responding to that by changing how we do things. There is a long-term trend of warming temperatures, shifting rainfall patterns and rising sea level. We have experienced this as highly variable weather – hot, cold, wet and dry – that has proved challenging in recent years.

The impacts of climate change have been felt across the Highlands, from damage to infrastructure, to disruption of vital services, and a shift in growing seasons. Corollary, in May 2019 the Council declared a Climate and Ecological Emergency which requires us to be a net zero carbon region by 2025. This has redefined our approach to planning our future and is at

the heart of everything we do.

Whilst this declaration sets major challenges for us, it does provide substantial opportunities for our economy. Highland is considered to play a disproportionately significant role in delivering the national requirements for climate change due to our abundant natural assets, renewables generation capacity, and the qualities and characteristic that uniquely define our region.

However, to deliver Highland as a low carbon place and thus creating and sustaining Highland as a region within a net zero emissions Scotland, our candidate National Developments (cND's) all require effective local networks which inter-connect seamlessly to the wider Highlands & Islands region, and national and international networks to ensure a sustainable production, distribution and consumption of resources and services. Therefore, our proposed cND's which most closely contribute to addressing climate change are:

- Continual Rail infrastructure improvements for both commuter and freight transport.
- Completion of the previously committed Trunk Road improvements (A9 and A96 dualling programmes), but with greater integration of park & ride schemes, active travel, Electric Vehicle (EV) charging provision and public transport infrastructure.
- Completion of the High Voltage electricity grid reinforcement and modernisation program coupled with the development of "smart grids".

The requested cND proformas for each will follow shortly.

It is understood that for the first time, Scottish Planning Policy will be incorporated into the National Planning Framework and as part of the CfI consultation you are seeking views on the suggested policy topics that could be included in a combined SPP and NPF document.

We contend that several of the suggested Policy Topics offer a real opportunity to deliver on the climate change agenda. Therefore, our response to the Policy Topics outlined below in particular also reflects our ambition for a net zero carbon area:

- Green Infrastructure
- Housing
- Waste
- Climate Change
- Coastal Planning
- Flooding
- Infrastructure
- Natural Environment
- Peatland
- Sustainability
- Placemaking
- Transportation
- Energy – Electricity
- Energy – Heat
- Rural Development
- Aquaculture

Our justification for this, with a full and detailed response on each Policy Topic will follow shortly.

2. How can planning best support our quality of life, health

and wellbeing in the future?

Across Highland in recent years, lifestyles and social attitudes have been changing, with more people wishing to live in a friendly and welcoming community which has quick and easy access to a shops, work and services allowing them to spend less time commuting and more time with family and friends. Therefore as we advance to 2050, our emerging vision requires the safeguarding and growing of locally resilient and self-supporting communities which have local access to quality and appropriate housing, educational and medical facilities, appropriate employment opportunities, food and energy production, and a range of transport links and leisure facilities. Many of the strategic service and facilities are located in Inverness and across Highland and these communities thereby act as hubs for the whole of the wider Highlands and Islands region.

Furthermore, we believe that locally produced and sourced food and the generation of cost-effective clean renewable energy via local energy networks will contribute significantly to this national outcome, whilst also helping to address both food and fuel poverty. Based on our previous and ongoing work in these areas, and our vision for how it might improve our communities, Highland is judged to be well placed to deliver on this. We have examples of communities that are finding creative solutions to unlocking local access to services such as food and energy. In addition, in recent years the Highland Council has strived to improve our engagement and empowerment of local communities in Place Planning.

Our understanding is that NPF4 will take a greater role in defining “targets for the use of land for housing in different areas of Scotland”, as required by the Planning (Scotland) Act 2019 and the Scottish Government will use the opportunity to streamline the process of housing delivery. Whilst this ambition is considered worthy and should allow Local Authorities and stakeholders to focus on the creation of quality places, the delivery of high-quality appropriate housing tenure will somewhat fall to the Scottish Government and it must be ensured that the full range and type of tenure is provided. The candidate national development for housing delivery is aimed at addressing the particular challenges for the delivery of housing in areas such as Highland.

We recognise our role in coordinating the strategic and local issues for Place Planning and the vital role that the LDP Delivery Programme can continue to play in achieving this, for example through the Fort William 2040 exercise. We also recognise that support, funding and development is also necessary at a national level and our candidate National Developments (cND's) that most contribute in this regard are:

- New and improved regionally important strategic healthcare, justice and educational facilities which play a regional role for Highland itself and the wider Highlands and Islands region.
- Local resilient networks for the production, added value processing, distribution and consumption of resources including local food, renewable energy generation and consumption, active travel, waste management and healthcare.
- Maintaining, development and promotion of national long-distance cycling and walking networks.
- Deliver on the national commitment to provide high quality housing to meet needs, particularly affordable and adaptive housing.

The requested *cND* proformas for each will follow shortly.

With regard to the suggested Policy Topics, a number are particularly relevant on how planning can support our quality of life, health and wellbeing in the future and our response to the topics outlined below reflects this theme whilst incorporating our vision for the development of locally resilient self-supporting communities right across the Highland Region:

- Community Facilities

- Culture & the Arts
- Digital
- Gypsy Travellers
- Green Infrastructure
- Housing
- Health
- Waste
- Business / Employment
- Energy – Electricity
- Energy - Heat
- Rural Development
- Town Centres
- Air Quality
- Climate Change
- Coastal Planning
- Infrastructure
- Historic Environment
- Natural Environment
- Placemaking
- Sustainability
- Transport

Our justification for this, with a full and detailed response on each Policy Topic will follow shortly.

3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

The planning system has and will continue to play a pivotal role in enabling development and investment in the local, regional and national economies and across Highland the importance of physical and virtual connections is paramount to continue to deliver benefits to our communities and wider public.

The ongoing pandemic has demonstrated the benefits of the virtual digital network and whilst we understand that the roll out of the 'Digital Fibre Network' is now classed as being complete. We are nevertheless aware that there is a number of "notspots" across Highlands, which we understand are planned to be addressed these via satellite and mobile solutions rather than hard-wired solutions. Furthermore, the growth and roll-out of the 5G will primarily focus on upgrading and replacement of existing 3/4G mast infrastructure rather than the identification of new sites. Consequently, the ongoing development of the virtual digital network should be delivered with strategic funding for comprehensive national coverage.

Highland also has a unique role across the Highlands & Islands and the North East regions in relation to its connectivity, with Inverness acting both as a regional transport hub for the islands and our remote communities and also international travel arrival and departure hub. This transport network is of critical importance to current and future businesses and investment. In particular our ports of entry play a critical role in handling and processing freight, energy delivery and development, passenger access and recreational use.

The Highland region has seen considerable and welcome tourism growth over recent years. Whilst this has brought many benefits it has also highlighted many infrastructural and servicing constraints. We are continuing to strength the regional image and bolster the 'Highland brand' which we believe will continue to attract a strong interest for our wider economy including tourism. The challenge for us in the future is to ensure the continual growth results in a sustainable and net-zero tourism industry, providing high-quality year-round employment

opportunities.

The Highland region is currently experiencing significant interest and investment in the development of an international space hub, initially as a staging point for the delivery of low earth observational commercial satellites to monitor vegetation, weather, cloud cover and ice cover to monitor and understand climate change. The development of such a hub is considered to result in a number of high quality employment opportunities and the better review and assist in the delivery of our emerging local vision and wider benefits across the whole of Scotland.

To achieve the delivery of the above our *candidate National Developments* (cND's) that most contribute in relation to this aspect are as follows:

- Continual rail infrastructure improvements for both commuter and freight transport.
- Sea Port development and investment (including potential Freeport status), resulting in nationally significant employment, renewables technology handling, cruise ship visits.
- Completion of the previously committed Trunk Road improvements (A9 and A96 dualling programmes), but with greater integration of park & ride schemes, active travel, Electric Vehicle (EV) charging provision and public transport infrastructure.
- Strategic Airport Enhancements (including investment in air traffic control technology) at Inverness, Skye & Wick and innovation in new sustainable aircraft design.
- Maintaining, development and promotion of national long-distance cycling and walking networks, directly linking to local active travel corridors and public transport connections which contain suitable transport carrying capacity.
- New and improved regionally important strategic Healthcare, justice and educational facilities.
- Continual delivery and modernisation of the virtual digital network with strategic funding to ensure comprehensive national coverage.
- Emerging Space industry funding, support and development.
- Tourism industry support infrastructure (investment in the transport, interpretation, digital communications and waste management networks that ensure tourists enjoy a high quality of experience).

The requested cND proformas for each will follow shortly.

Again the Policy Topics, of relevance to enable development and investment in our economy are noted below and the detailed responses to each enshrine our emerging vision regarding the importance of physical and virtual connections or our communities and attracting a strong, sustainable and net-zero tourism industry:

- Community Facilities
- Digital
- Tourism
- Health
- Business / Employment
- Rural Development
- Town Centres
- Placemaking
- Sustainability
- Transport

Our justification for this, with a full and detailed response on each Policy Topic will follow shortly.

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

The planning system for many years has sought to strike a balance between accommodating suitable and sustainable development and the management of our natural and built heritage assets. This approach aims to maintain and enhance the unique qualities of the Highland region.

Elsewhere in this response we have highlighted the need for national and local coordination of investment in communities and infrastructure to be reconciled with local empowerment and engagement in place planning. We believe this is the key to achieving this high level outcome and in delivering the Place Principle. We therefore wish to continue to work in close collaboration with Scottish Government and all relevant partners to ensure that our communities feel engaged in shaping their future and maintain and enhancing their qualities and special characteristics.

This approach should take account of the qualities and assets that are of most value to a particular place, region and the country. In this regard, we consider that the NPF should recognise that Highland offers unparalleled resources for the delivery of carbon reduction in support of wider national interests. This includes the protection and restoration of our peatland resource, and reforestation, whilst offering a strong, sustainable and net-zero tourism industry.

Our *candidate National Development* (cND's) most relevant to the protection and strengthening the special character of our places is:

- Supporting the adoption and sustainable management of the Flow Country proposed World Heritage Site.
- The land management, protection and restoration of our natural and bio-diversity assets, including our peatland areas and reforestation of Scotland.

The requested cND proformas will follow shortly.

The Policy Topics we consider salient to the protection and strengthening the special character of our places are outlined below and again the detailed responses to each will follow shortly:

- Green Infrastructure
- Aquaculture
- Rural Development
- Tourism
- Air Quality
- Climate Change
- Coastal Planning
- Flooding
- Historic Environment
- Natural Environment
- Peatland
- Mineral Extraction
- Infrastructure
- Placemaking
- Sustainability

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

The majority of the cND and PT outlined in the answers to the previous Questions are relevant here and should be taken as forming an answer to this question

Scottish Government is advocating a sustainable 'Infrastructure First approach' which creates an opportunity to radically improve our approach to the planning, delivery and management of infrastructure for our communities. This will aid the delivery of our physical and virtual connections.

We contend that the role of the LDP delivery programme is of primary importance to deliver infrastructure across Scotland and requires Scottish Government to engage with and collaborate on our future collective investment across all communities. Our recent experience in delivering the FW2040 Masterplan and delivery programme has highlighted good progress in delivering a joined up approach to place planning. Indeed we are seeking to build upon this in our approach to working more collaboratively with communities. However, the FW2040 experience has also highlighted a fragmented approach to the coordination of investment. It is vital that NPF4 plays its role in addressing this lack of coordinated investment across Scotland, particularly in the context of the Place Principle.

Moreover, infrastructure considerations need to reflect more than just physical (road and rail) assets but including blue and green infrastructure, active travel infrastructure and digital infrastructure.

In Highland's instance, Inverness has been developed as a principal hub and economic driver of the region and to ensure its economic prosperity along with the entire region continues to develop sustainably in the future the following *candidate National Developments* (cND's) are considered necessary:

- All as above

The requested cND proformas for each will follow shortly.

Additionally, the Policy Topics we consider relate to the delivery of physical and virtual infrastructure connections to achieve our emerging vision are outlined below and again the detailed responses to each will follow shortly:

- Community Facilities
- Culture & the Arts
- Digital
- Green Infrastructure
- Waste
- Business / Employment
- Energy – Electricity
- Energy – Heat
- Mineral Extraction
- Rural Development
- Coastal Planning
- Infrastructure
- Placemaking
- Sustainability
- Transport
- Vacant & Derelict Land

Conclusion

In concluding, the Highland Council wishes to emphasise the importance that we see in how the elements of our submission would work together to deliver shared outcomes and, critically, for the Highland region to make its key contribution to enabling development and creation of jobs whilst delivering carbon reduction. We look forward to further working up the iRSS for Highland and would welcome further engagement by Scottish Government with us, to aide the preparation of Draft NPF4, particularly any opportunities ahead of its content being fixed for formal consultation.

