

National Planning Framework for Scotland (NPF4) – Call for Ideas

A review of existing SPP in relation to the 5 key questions posed

Q1. What development will we need to address climate change?

Is the existing SPP policy adequate? If not, why not?

- a. SPP and NPF3 superseded by events, not least climate emergency.
- b. SPP not strong enough: built development, for example, often didn't meet its aspirations regardless of Place Toolkit.
- c. Planning system as a whole has to deal with a wide and complex range of issues, but they have to be brought together when considering individual places. NPF4 is a chance to help this more.
- d. SPP did not have a spatial strategy on energy development and where it should go.
- e. SPP did not have enough recognition of the benefits of peatland, including carbon storage and water flow regulation.

What should be done in NPF4 to address this issue?

- a) Tackle multiple benefits as well as issues in individual topics. For example the amenity and renewable materials aspects of trees and woodland as well as their carbon sequestration benefits.
- b) Provide a national spatial overview for land use, planning and infrastructure, based on Landscape Character Assessment. This would also be a basis for reviewing, at local, regional and national scales, to check desired climate change results (e.g. increase of woodland cover) are being achieved.
- c) All development should aim to be carbon neutral and result in no net biodiversity loss with clear justification set out as to why this target cannot be met. (There's an issue about the boundary for considering this: national? International?) Carbon offsetting shouldn't count. Examples of good practice of where this has happened should be made available to planning authorities.
- d) All planning mechanisms, such as planning gain, should focus on climate change. (There is an issue about how far to take this, for example considering with open space: amenity / cultural value may take precedence over, say, flood alleviation in some places).
- e) Aim for appropriate levels of species diversity. ("Appropriate" species are likely to change with climate change.)
- f) Circular economy
- g) Be scale aware / work at an appropriate scale, bearing in mind this may be over much larger areas than currently. Catchment areas, for example, for drainage and microclimate.
- h) Place-based approach needed – be realistic for both urban and rural areas.
- i) Needs to be make meaningful connections with Land Use Strategy
- j) Needs to integrate land use and planning, spelling out what it means in practice.
- k) Provide clarity on how related aspects, such as Community Planning Partnerships, come together (how do communities fit in?).
 - a. Provide information source, e.g. on locally valued places to help Local Place Plans and help communities' interests be taken into account.
- l) Set up and use valid evaluation mechanisms, e.g. whole-life carbon budgets, to make good decisions; for example not over-reacting to one aspect of climate emergency but consider where turbines are sourced from and their disembodied energy). These decisions also need to consider maintenance and running costs.
 - a. Don't be distracted by the 'shiny and new'.
 - b. Retrofitting is important for GI and is also a more widely applicable approach.
- m) More woodland planting and peatland restoration.
- n) Be guided by the recommendations of UK Committee on Climate Change 2019 report.

- o) Permitted Development Rights need to take account of climate change, due to cumulative effects of, e.g. soil-sealing driveways and gardens. Use guidance (e.g. on permeable surfaces, rain gardens) and incentives (e.g. provide water butts) as well as directive of changing / removing PD.
- p) Emphasise more nature-based solutions.
- q) Put requirement on using any brownfield sites first before any green field sites are released. Put density of housing required up in central urban areas.
- r) In order to gain planning permission, require all development especially housing to compulsorily address:
 - a. Reusing existing buildings first.
 - b. Reusing brownfield sites
 - c. Using natural materials
 - d. Building to circular economy requirements i.e. whole life, deconstructable
 - e. Connectivity for sustainable transport, biodiversity, energy

Are there other issues to raise or policies needed?

- i. There needs to be enough resource and expertise on landscape in planning authorities.
- ii. Have a climate change policy in the interim, similar to sustainability policy, to enable obvious “wins” to be approved in the meantime.
- iii. Climate change needs to be further up the pecking order, in a rational way. For developers too. Consideration of climate change measures should not be an add-on.
- iv. Things *are* going to be different (more floods etc.) so planning needs to help with adaption to this.
- v. The public sector and government should lead by example and have hot offices/satellite offices in smaller communities where anyone in that community can work – paid for and used mainly by public sector. Private sector can rent space on a daily basis. Saves lots of people sitting in isolation at home with their heating on. It also encourages cross discipline working as you get to see/hear what others are doing. It means rents for expensive city/large town offices can be reduced. People are more likely to walk or cycle to their local hot office. Make it compulsory for all councils to find hot offices in rural areas.

National Planning Framework for Scotland (NPF4) – Call for Ideas

A review of existing SPP in relation to the 5 key questions posed

Q2. How can planning best support quality of life, health & wellbeing in the future?
Is the existing SPP policy adequate? If not, why not?
<ul style="list-style-type: none"> a. There is plenty of good policy evidence on health and wellbeing but no realistic delivery through SPP and no meaningful improvements in NPF3 outcomes since 2014 b. Good landscape contributes to improved health and wellbeing (physical activity; mental wellbeing and community cohesion) yet landscape is fragmented between SPP, Government directorates and LPA departments. This leads to a lack of joined up thinking and poor outcomes. c. Development is developer led and there is no experience or desire to achieve outcomes on health and wellbeing. d. The Place Principal and the Place Standard will not address the issue of poor quality proposals and development. e. There are no indicators on what a quality multi functional landscape is and how this can deliver on health and wellbeing.
What should be done in NPF4 to address this issue?
<p>Big Ideas</p> <ul style="list-style-type: none"> 1. An opportunity to alter the current format and siloed nature of planning policy by reversing its structure and prioritising the role of landscape and new landscape-related policy in a top down approach. 2. NPF4 to include a strategic / national plan and policy for <i>Landscape, Land Use and Infrastructure</i> to consider and design appropriately for large scale change required to deliver on priorities for climate change, loss of biodiversity and health and wellbeing. This can then inform Regional strategies and Local Development Plans consistently at a range of scales 3. All recommendations pertaining to NPF4 and planning policy contained in “A blueprint for Scotland” should be incorporated. (Key Findings Report, Infrastructure Commission for Scotland. Jan 2020). 4. There is an opportunity to widen the recommendation to include Natural Capital as infrastructure to all landscape as infrastructure as defined by the European Landscape Convention. Elevate a green framework / infrastructure approach; prioritise natural solutions and introduce Net Biodiversity Gain. 5. NPF proposed outcomes should be expanded to include securing positive effects for biodiversity and landscape 6. A National Landscape Advisor to the Scottish Government to work across current SG Directorates to achieve consistent and joined up thinking and demonstrate the SG’s commitment to the Place Principle by working holistically between its own Directorates and with other stakeholders and by doing this will also permeate down to Local Planning Authority decision making. 7. Development of national indicators for landscape and reporting on within the National Planning Framework. 8. Functions of Councils reviewed to ensure that the delivery and management of this landscape infrastructure become part of statutory duties to ensure its provision, quality and effective use. This in turn will require quality standards of landscape infrastructure to be defined to deliver national outcomes. <p>General / good practice</p> <ul style="list-style-type: none"> 1. Climate change needs to lead to culture change across society. Communities can be motivated if opportunities are available and community led, managed and supported– food growing, healthy diets, exercise leading to social / mental well-being. 2. Rural and ageing populations – intergenerational development to improve health & well-being and limit social isolation. 3. 25% open space as part of developments requires quality and use indicators (see design section below) that are based on multiple benefits of climate change / health and well being and biodiversity 4. NBG should be considered in all areas including retrofitting - VDL, green roofs etc. However it shouldn’t be a tick box exercise

5. Scotland's natural and cultural landscapes are vital for our sense of well-being and economy (tourism) Tourism Tax must be used for government priorities on health & well-being / climate change / licensing
6. Poor landscape and deprivation often occur together, meaning that those in greatest need are least able to access quality outdoor spaces. This contributes to health inequalities in Scotland. More options for releasing V&D land for community benefit that is community led and not developer led.
7. Stewardship – make better what we have, don't always go for a new thing
8. Compulsory review of ALL buildings to test for damp/mould from bad insulation and material choices. Follow best practice from groups such as SEDA.

design

9. Planners and decision-makers need to understand the importance of design and 'design-thinking' in creating beautiful, healthy, relevant and vibrant places and spaces
10. Good design empowers people. Raise public and developer understanding and buy in of the health benefits of landscape and what a quality landscape can be through best practice examples.
11. Designed responses– requires appropriate expertise and developers need to demonstrate expertise in design and delivering benefits.
12. Creating quality landscapes in all areas based on defined standards. Define quality through statutory design guidance. Clear, landscape-led objectives for each new development to achieve stated, multiple benefits including NBSG and linked to a performance indicator on landscape
13. Quality certification on landscape for developments linked to habitation certificated by developer
14. Deprived communities need better voices and an intergenerational approach is required to community planning. Younger people are more savvy and educated about health & well-being and ecology.
15. Initiatives such as Sustrans focus on producing the cycle route to certain design standards that can override the benefits of existing landscape/biodiversity. Ensuring a joined up approach in outcomes is essential for better health and wellbeing
16. Footpath / cycle paths for commuter and school routes are currently piecemeal. To encourage people to move away from the car culture and towards a healthier alternative - planning policy should prioritise alternative green and healthy travel options over the car and encourage liaison between all travel providers.
17. Community food growing - would contribute to healthier diets and lifestyle. Written into future residential planning requirement - opportunities for allotments/schools / V&D land / underused public space.
18. Green infrastructure can also be edible.
19. Expand the principal of play facilities for new developments including shops, school, meeting place, park etc. Encourage hub of facilities with denser housing round it, getting less dense further away.

Organisation / information

20. Big land uses and owners have a role to play. Forestry / commercial and FC and farming play a big part in our health & well-being.
21. Delivering multiple benefits / agencies to deliver multiple benefits
22. LPA – system to measure / assess the benefits of a development proposal
23. Major developments: more upfront information and commitment to achieve outcomes
24. Strategic level to measure health & well-being for all.
25. Wider joined-up connections between organisations (PHS, for example) for continuity to deliver benefits.

Resources

26. There is an expertise and skills shortage in landscape matters in all local planning authorities and to address this a *landscape professional* becomes as statutory post
27. Landscape professionals can offer design skills – health & well-being, climate change, SuDS, GI.
28. Development function to be adequately resourced in local authorities allowing recruitment, training and increasing capacity for community engagement and development management
29. National Landscape Adviser
30. Resources: PHS v LPA and agencies – a mismatch. We know how to deliver but failing due to resources. Community planning and empowerment need continued support.

National Planning Framework for Scotland (NPF4) – Call for Ideas

A review of existing SPP in relation to the 5 key questions posed

Q3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

Is the existing SPP policy adequate? If not, why not?

- a. Financial mechanisms don't support re-use of existing buildings.
- b. Disconnection between NPF and LDP

What should be done in NPF4 to address this issue?

General

1. Carbon neutral
2. Have a landscape and well-being economy: beauty + economy + tourism. Value design is not design of place.
3. Future connectivity and economy:
 - a. Forestry / coastlines / peatland
 - b. Mineral – landscape scale opportunities
 - c. Agriculture / aquaculture / energy.
 - d. “Landscape of power” – location of solar / wind / ground source / pylons (reducing visual impact) / digital storage and use
4. Infrastructure
 - a. to allow tourism and development.
 - b. Public sector support / invest in infrastructure to allow development in the planned location. Contaminated land etc.
 - c. Infrastructure first – government pays then repaid
5. Strategic planning
 - a. at landscape scale, e.g. wind turbines more efficient.
 - b. Regional Spatial Strategies: wind, forestry, water (RBMP); forestry cover – alter character
 - c. Local energy production to reduce transmission – regional spatial strategy
 - d. Regional land use planning across border.
 - e. Landscape architects' National spatial overview
6. NPF4 is opportunity to link NPF and LDP. Clear link needed NPF4 to implementation
7. Reorganisation of how we do things for climate change
8. Coastal and marine issues – long distance path / tourism.
9. Modern technologies – coastal-based industry impact on landscape character
10. Change farming landscape – currently industrialised / broad scale: move to small scale
11. Social change and technical change impact on landscape.
12. In rural areas, use any existing facilities (village hall, pub) require councils to create hub for community facilities such as banking, post office, medical care, library- multi functional heart of the community.

Finance / resources / ways of assessing benefit

13. Land value and market driven
14. Public sector led investment (City Deal) – invest, reuse; reuse existing infrastructure.
15. Evaluation developer pay after 5 years - feedback to planning authority
16. Financial support required for whatever policy is in Plan
17. Inward investment to target areas

18. Public sector resources to support communities, and the design skills to enable their vision – which is frequently landscape / public realm.
19. What do we manufacture? Reduction of carbon footprint. Full life costs. Constraints of financial models linking to policy.
20. Public interest development.
21. Cultural landscape importance and setting and beauty relates to economy
22. Natural Capital – across different areas, multiple benefits - / build with nature / Ecosystems Services.
23. Support rural areas by compulsorily built affordable housing being available only to those with low income jobs locally.

Scale

24. Strategic partnership sustainable development – influence at landscape scale
25. Landscape scale study of river corridors etc. to allow relocation of residential and commercial might require financial assistance
26. Nature-based solutions often need to be landscape scale.

Development / design

27. Ian McHarg principles in ‘Design with Nature’– start with nature (settlements)
28. Residential and commercial should be “together” to allow connectivity
29. Changing economic base allows creation of more compact places with industry and housing.
30. New housing area should not just be based around shopping. It needs civic space and civic building multi-functional for all ages and uses.
31. Housing legacy and space
32. Place needs to be spaces in between
33. Design of every development to implementation and the legacy left to built and natural environment of a healthy Scotland.
34. Well-designed places: landscape architect led masterplans (with urban designers): [2019 guidance](#) on the Flood Act states landscape architects required in teams.
35. Recognition of cumulative development
36. Planning authority bringing parcels of land together to achieve overall place-making adapted to climate change of the public good.
37. NPF4 needs to link to Scottish land reform work
38. Food growing etc. health & well-being higher population in deprived area target location for new technologies.
39. Healthy landscapes key in deprived areas

Are there other issues to raise or policies needed?

- i. Resourcing planning system in the public sector recognising the value of landscape architects in policy, design – strategic design, policy design, implementation
- ii. Aesthetics and planning training
- iii. Landscape scale training

National Planning Framework for Scotland (NPF4) – Call for Ideas

A review of existing SPP in relation to the 5 key questions posed

Q4. What policies are needed to improve, protect and strengthen the special character of our places?

Is the existing SPP policy adequate? If not, why not?

- a) Landscape character is a key strand of national planning in the current SPP and NPF3 and emphasises an all-landscapes approach which tallies with the European Landscape Convention. This should be strengthened and incorporated in NPF4
- SPP acknowledges (paragraph 193) that Scotland’s natural environment is an asset to the country’s economy and people’s sense of well-being. The environment is a valued national asset offering a wide range of opportunities for enjoyment, recreation and sustainable economic activity.
 - SPP also says that a policy principle is to “*facilitate positive change while maintaining and enhancing distinctive landscape character*”. (para 194)
- b) There is little protection in SPP for Gardens & Designed Landscapes

What should be done in NPF4 to address this issue?

What special places will need protection in the future?

1. Landscape Character. Retain the importance of this in NPF4. Direct policy wording to protect. Digital planning will help communicate. Strategic and Regional Land Use Plans. (Strengthen policy area) .
2. Continue to recognise Landscape Character Assessment and Scotland’s pioneering work in getting national coverage and more recent digital coverage; that ELC is Council of Europe – so will continue and may increase in relevance as a communication route with Europe; and that we’re in danger, without this type of landscape ‘foundation’ of losing ground to other UK countries with the build beautiful agenda.
3. Stronger protection for Gardens & Designed Landscapes will be needed (both Inventory and non-Inventory). How - by strengthening the legislative base and making sure councils have up-to-date records and inventories. (Strengthen policy)
4. Heritage Trees – protection is needed. How – as per England. (New policy area)
5. NSAs – retain (Keep / tweak policy area)
6. Places of local importance as defined by communities. How – through specific wording and guidance in Local Place Plans. Councils should have due regard for the issues and matters identified. (New policy area)
7. Uplands and Peatlands. How – protect and prioritise, plan strategically and integrate with other climate objectives. Link to Land Use Plans. Give Land Use Plans teeth! (Strengthen policy area)
8. Intangible cultural heritage. How – identified in HES strategy. Possibly through Place Plans. Mapping needed. (New policy area)
9. Wild land. How – retain and refine. Engage communities. (Keep / tweak policy area)
10. Tourism is a problem and needs special plans and strategies through the planning system. E.g. Orkney and Shetland cruise liners not adding value to place or economy.
11. Special Landscape Qualities need recognised in NSA and National Park policy wording. (Strengthen policy).

What future for our coastal / island communities?

12. Offshore wind and renewables. How to harness benefits and minimise impacts
13. Making the most of Crown Estate Scotland assets. How – greater community control over assets and finance.
14. Community Place Plans will be vitally important
15. Regional Spatial Strategies. How – getting strategic about coastal and island issues, and planning ahead.
16. Tourism – as per above.

General

17. Stronger policy voice for landscape needed in NPF4
18. Possible conflict between natural and cultural heritage on wild land. A National Spatial Overview from SG would resolve this - feeding down to regional spatial overview from councils to local spatial overview also from councils. This should be aided by communities including masterplan of individual urban areas, linking all the policies and making sure they can all work together, and that networks such as transport, energy, flooding, biodiversity are all designed and working together.

Vacant and Derelict Land

19. Place Plans will be key. How – coordinate activity
20. Brownfield first. How – turn the tap off greenfield; tax incentives etc.

How can we protect and restore peatland?

21. Regional land use plans – these will be key. Mandatory powers to act to restore.
22. Planning needs to integrate climate change plans and look at catchment-scale approaches to environmental protection, flooding etc.
23. Stronger powers against peatland damage. How – policy to stop excavation and building on peatland needs absolute clarity and firm policy appraisal.
24. Forest & Woodland Strategies. How- F+W Strategies should communicate peatland areas and impact avoidance.

How can we plan for blue / green infrastructure?

25. Resources. How – we need landscape architects working in planning as part of multi-disciplinary teams. Too many planners! Not enough landscape architects in planning.
26. Stricter requirements to deliver spatial plans, design briefs and development management. How – local authorities should do more on development briefs and design frameworks
27. Development Plans should have standardised approach to green network / GI strategies. How – policy and guidance; pro-active and iterative; linked to Place Plans; robust requirements in Open Space Strategies.
28. Development Plans and planning system need to articulate a stronger voice for GI and biodiversity in response to climate emergency, health & well-being etc.
29. Good things in SPP GI policy. BUT stronger wording and clarity on requirements needed.
30. This is the one policy area that LIS should be right on top of. Stronger wording needed on LI.
31. Time is now to move things forward on GI and biodiversity.

What can we do to protect and enhance biodiversity?

32. Spatial planning needs to improve. How – clearer guidance on multi-functional green networks; biodiversity maps need to be the starting point; green networks need to have ecological under-pinning.
33. Biodiversity Net Gain. How – follow English approach or something similarly robust. How – we need to work through it, in partnership.
34. Resources needed – landscape and ecology staff needed within planning departments.
35. Site development briefs need to set out biodiversity and GI requirements clearly in spatial, policy and design terms.
36. *Compulsory habitat loss creation for all new developments: green roofs on all new urban developments.*
37. This is an important area of policy for the LI to deliver clear advice on.

National Planning Framework for Scotland (NPF4) – Call for Ideas

A review of existing SPP in relation to the 5 key questions posed

Q5. What infrastructure do we need to build to realise our long term aspirations?

What should be done in NPF4 to address this issue?

General

1. Challenges: SuDS; climate change adaptation; retrofitting.
2. Landscape as Infrastructure
 - a. Same weight / importance as ecology, roads etc.
 - b. No statutory backing – needs to be clear direction
 - c. Key criteria to consider – open space, gateways
 - d. Open Space Strategies – NPF4 – development needs to deliver this.
 - e. Quality – minimum standards – “Conservation Atlas of the Future” – aspiration ‘good enough’. Also maintenance (for open space too)
3. Landscape Net Gain
4. Woodland retention – tree and woodland strategy
5. Statutory powers of others having impacts on landscape – recognition / responsibilities
6. Tourism infrastructure – car based (e.g. NC500). “Post bus” example / shared transport / low carbon
7. Live / work – not always possible / feasible
8. Digital connection – benefit and repopulation and local business.
9. Quality of places / community. Libraries / community hubs.
10. Overcome institutional barriers – landscape maintenance. Have to maintain, not replace – longer term costs. Focus on new and innovative. Mechanism to enforce maintenance – up front cost. Delivery body to maintain landscape. Enforce planning.
11. Public land – multifunctional use.
12. Natural Capital
 - a. System of measuring / monetising – endorsed in NPF4
 - b. Use for monitoring / reporting
 - c. Balancing loss + gain – net gain.
13. Land Use and infrastructure – combine
14. Incentives to make beneficial change.
15. Emphasis on local infrastructure. Local heat and energy schemes should be set up supported by Councils/ energy providers.

Development / design

16. Life cycle / carbon footprints. E.g. district heating using imported biomass; better housing and enforce design standards.
17. Design – local sourcing – materials – supply chain.
18. Masterplans – more control to deliver solutions we need.
19. Spreading the load. Provide for all needs in every area.
20. Higher density – use available space in towns. Ensure walkable – attractive walking & cycling routes – faster – make less attractive for driving.
21. Future-roof housing – more, smaller houses
 - a. Control of house types
 - b. Should be able to direct type of housing development
 - c. Smaller houses / less space
22. In urban areas legislate for all services to sit within a service channel with easy accessible covering, NOT tarmac.

Green Infrastructure

- 23. Integrating – green and grey infrastructure.
- 24. GI at the heart – dictating everything else
- 25. Small woodlands; re-use VDL for trees – lower impact / more appropriate than large Sitka.

Energy

- 26. Energy – batteries; use of urban parks – multifunctional space
- 27. SuDS – issues with services / disorganised; use of underground space (and parks, see above). Utilities to share space – garden cities
- 28. Integrate landscape and infrastructure to prioritise pedestrians – always the majority – more central to place making.
- 29. Generation / storage within – housing
 - a. More space per unit – batteries
 - b. Local generation
 - c. Green spaces / parks – multifunctional – heat pumps / geothermal
- 30. Repowering – upgrade hydro; efficient – rather than effects on threats / people

Planning

- 31. Flexibility for local planning – not too much: balance between prescription and opportunity.
- 32. Planning for the future = hard decisions.
- 33. Long term planning – extraction of future resources; management; stewardship
- 34. Formalising guidance – not ‘take it or leave it’
- 35. Balance and land use planning.

Rural

- 36. Rural charging infrastructure
- 37. Rural connectivity
 - a. Rural housing with no transport
 - b. Connecting small towns / hubs as well as cities
 - c. Trains on rail lines not just cycles. Aspirations – free transport; car permit
- 38. Education – provide more flexible opportunities in rural areas for secondary to higher
- 39. Second homes – resolve conflict with communities with limited social housing and housing for young people to ensure these communities stay alive.

Transport

- 40. Expense of public transport
- 41. Hydrogen – transport of energy
- 42. Air travel – alternatives?
- 43. Bridges – knock-on effects on local infrastructure
- 44. Cost and availability of public transport and connections. Rail / bus
- 45. Electrify railway – green corridors. Other land owned by utilities.
- 46. Post-Brexit transport links to Ireland.
- 47. Connectivity – different transport types; bike racks on buses
- 48. Public transport – subsidise; change attitudes.
- 49. Rail – open stations
- 50. Remove priority for cars – other transport types higher priority
- 51. Look at all commuting routes and how we can encourage people to cycle/walk. Make Sustrans standards more adaptable for the situation.
- 52. Reduce all roads to the minimum width- lowering mph, and use any surplus width for expanded walking/cycling/green blue network.

Carbon

- 53. Information on carbon footprint / embedded carbon. Informed decision-making, e.g. replacing boilers.
- 54. Ban offsetting! Real alternatives not just finance.

