

NPF Review

The National Planning Framework 4 (NPF) will set out a long-term plan for Scotland, until 2050. It will contain **national planning policy** on various topics and identify **where development and infrastructure will be needed** to support sustainable economic growth. The consultation on NPF 4 is at the `call for ideas` stage. The table below contains Perth and Kinross Council's response to the call for ideas and follows the format of the **topic papers** available under Scottish Planning Policy at <https://www.transformingplanning.scot/national-planning-framework/resources/>.

Topic Area		Topic Paper Question (if you are answering one specifically)	Comment
PEOPLE	Community Facilities	How can we ensure that the impacts of new development on existing community - facilities are addressed in plans and decisions?	<p>Requiring robust evidence of early engagement with service providers during the LDP preparation process would be part of the answer. Identifying future requirements early on allows for safeguarding land for additional facilities and considering the resource implications of developing these within the given timeframes. Alternatively, evidence could suggest that the shortfall could not be addressed on time and development should be delayed or restricted. Where Local Place Plans are in place, they could be especially useful in highlighting demand for additional community facilities and should be used to inform LDPs</p> <p>The difficulty of acquiring the right evidence base however should be acknowledged. Local service providers such as GP surgeries, and even health boards may lack the capacity and/or the necessary data to be able to provide long-term projections for their service against proposed housing numbers. More guidance for stakeholders on how to engage with each other and what type of information should be provided to/by the planning authority would be useful. Nationally agreed protocols could be put in place with all service providers, both internally within Councils as well as with external agencies and arm's length service providers.</p>
		How can we ensure that the planning system makes appropriate provision for community facilities, including	In terms of safeguarding existing community and cultural facilities, Local Place Plans and audits could be instrumental in providing an evidence base by identifying key facilities which are important to the community and highlight the demand (or the lack of) for additional provision.

		the retention of existing facilities? Are there particular community facilities which the planning system should be prioritising the provision or safeguarding of?	The development of NPF4 is also an opportunity to consider how planning may influence the provision of care homes and nursing homes. In Perth and Kinross, data suggests low occupancy levels in nursing homes, therefore safeguarding this use is not a current priority. In this case, improving the quality of the available provision would be more important in trying to reduce the number of applications. In light of COVID-19, Health and Social Care Partnerships are already considering new models of care – the development of NPF4 could help shape the national conversation on this issue.
		Is there a need for a national planning policy on cemeteries and crematoria?	The collaborative approach above could also apply to identifying the need for new cemeteries. Perth and Kinross Council has taken an approach where `cemetery search areas` were identified in the local development plan in order to indicate where future provision may be delivered. Trial digs will help confirm whether the sites are suitable for cemetery use. It is not considered necessary to develop a separate policy on cemeteries however NPF4 could clarify the remit for LDPs to consider the need for additional facilities and allocate land for these where necessary.
	Digital	The development of the digital fibre network was designated a national development in NPF3. How can NPF4 continue to support its ongoing national roll-out and enhanced telecommunications infrastructure particularly in rural areas?	Connectivity should continue to be strategically important but a flexible and supportive policy framework only responds to changing economic circumstances and opportunities. The planning system should make provision for digital infrastructure in all new-built development as an integral part of the development. The development of NPF4 should seek to address the bigger challenge of retrofitting infrastructure particularly in Conservation Areas and also in rural areas where scale works against commercial solutions.
	Green Infrastructure	What is the potential for green and blue infrastructure to support our wider objectives on climate change?	Green and blue infrastructure (GI) supports our wider objectives on climate change as well as health and biodiversity by providing essential ecosystem services (e.g. water management, habitat creation, climate regulation, recreation).
		What more should planning policies do to ensure that the benefits of green infrastructure are maximised, and to show increasing performance against	SPP states that green infrastructure should be considered as an integral element of places from the outset of the planning process. This is a crucial point that should be carried forward into NPF4 with an emphasis on considering GI alongside basic grey infrastructure requirements such as road access or drainage. NPF4 should also provide policy support for the integration of green corridors, play opportunities and sustainable drainage with roads and streets. Updated national guidance on how this

	<p>the national indicator on access to green and blue space?</p>	<p>can be achieved through street design would be useful for new as well as retrofitting projects and aid the implementation of the policy.</p> <p>Planning authorities can help achieve policy objectives by identifying site specific opportunities for the protection and enhancement of GI in LDPs and/or planning guidance*. Planning proposals in return, including those for social housing, should be required to clearly demonstrate how they maximise these opportunities through their layout and design.</p> <p>*Perth and Kinross Council has undertaken an opportunity mapping exercise for our revised Green and Blue Infrastructure Planning Guidance. The data and methodologies available to Local Authorities for identifying and communicating GI opportunities could be further improved and simplified in order to encourage evidence-based GI planning.</p>
	<p>Is there a need to safeguard areas of green infrastructure which provide flood risk management services, such as floodplains, river corridors and flow paths?</p>	<p>NPF4 should establish a clear link between green and blue infrastructure, flood risk management and sustainable drainage. Floodplains and riparian corridors should be safeguarded as part of green and blue infrastructure and opportunities to improve them through new development should be highlighted. NPF4 should promote SuDS as a nature-based approach to water management, where SuDS are:</p> <ul style="list-style-type: none"> - multifunctional, contributing to the biodiversity and amenity of the place - well- integrated with the wider landscape and public open space functions of the site <p>Links to best practice guidance could be provided e.g. Ciria Manual or RSPB & WWT: Sustainable Drainage Systems</p>
	<p>What more can NPF4 do to support allotments/community growing places?</p>	<p>The development of NPF4 is an opportunity to consider how the planning system could support the delivery of the Good Food Nation objectives and the emerging Good Food Nation Bill. For instance, consider giving stronger advice on creating food growing spaces and promoting edible landscapes within new developments. E.g. all new developments/regeneration projects of a certain size should include some level of food growing provision. Organisations such as Nourish Scotland who are involved with food growing related research and practice could be consulted on this question.</p>

Gypsy Travellers		-	SPP states that “SDPs should safeguard existing strategic or regionally important assets and identify strategic priorities for green infrastructure.” Will NPF4 aim to identify priorities for regional level GI or is this left for Local Development Plans / cross – boundary partnership working? The spatial strategy for `natural, resilient place` in NPF3 is limited to only the Central Scotland Green Network and Long-Distance Routes.
		Should NPF4 include policies specific to major developments to ensure that the potential for blue and green infrastructure is maximised?	All development should contribute to green infrastructure; it is however major proposals that provide the most significant opportunities for GI improvements. NPF4 could acknowledge this and include specific policies for major developments that require developers to demonstrate how GI opportunities have been maximised within the site.
		How can NPF4 ensure that land for appropriately located public sites is made available in development plans to meet a need identified through the HNDA process?	The Planning Act already requires that Development Plans address any identified need. NPF4 only need adopt this as a requirement to be shown in Plans. It should be noted however that this is something that requires resource for both the acquisition and setting up of sites as well as the consultation involved in assessing need and identifying the most appropriate site.
		What locational guidance should be provided to direct new development proposals to suitable sites?	National locational guidance is appropriate to ensure consistency with previous research on Gypsy/Traveller needs including PAS guidance, the public site standards, art 8 ECHR, the Equalities Act and case law. Guidance must be informed by the Gypsy/Traveller community themselves. Guidance should however be simple and flexible enough to take into account different needs and beliefs of different families and communities. It may therefore be best to that guidance provides matters to consider rather than a set of criteria. There may however be common preferences such as access to education and objective safety concerns such as proximity to roads. Criteria should specify which kind of site they apply to.

		<p>Should NPF4 include policy criteria to support acceptable proposals coming forward if there are no suitable sites identified in the development plan?</p>	<p>Yes. As with the settled community, engagement in the development plan does not reach everyone. With a shortage of sites across Scotland it would be inappropriate to not allow for windfall sites. Policy criteria for these sites is essential to guide applicants when making applications and ensure pertinent matters are taken into account in planning decisions and help limit consideration of non-material matters.</p>
		<p>Should NPF4 include policy criteria setting out the issues that should be addressed by proposals for small privately owned sites?</p>	<p>Yes. Small sites (which should be defined) would still benefit from guidance to make the planning process straightforward for both applicants and decision-makers. Smaller site requirements should be proportionate to the scale of the site.</p>
		<p>Is there a need to include mapping of transit routes and sites in the spatial analysis and proposals for NPF4, so that authorities can refer to this as part of the evidence base for their plans?</p>	<p>Existing knowledge of transit routes and sites would be valuable to provide to local authorities as evidence to help inform their evidence base. However it may not be appropriate to widely share this information publicly. The identification of need and sites is best carried out at a local level in consultation with the travelling communities.</p>
		<p>Is there a need to set out what is expected to engage with, and meet the needs of, Gypsy/Travellers in LDP evidence reports?</p>	<p>It would be useful to know the expectations with regards to the final content of evidence reports. However, engagement will vary depending on the travelling communities involved and the resources available to the Council as will meeting their needs.</p>

		<p>What can the planning system do to support the human rights of Gypsy / Travellers to travel? What approach and criteria should be used to inform consideration of transit sites in local development plans?</p>	<p>Without planning permission and a licence, the planning system (per the TCPA and Caravans Act) restricts the time and number of caravans on a site, regardless of how suitable it is. A change in regulation or legislation such as through permitted development rights would be required to make this easier. Given current difficulties there would need to be a clear message to welcome applications for transit sites. Guidance would also be useful for public sites. Any guidance should be limited such as to environmental, safety and welfare concerns to ensure the process is as simple as possible. Public sites will need to be guided by information provided by the community on traditional sites as well as knowledge of the suitability of the site by the people who will use them. The planning system also needs to be clearly co-ordinated with health and education providers.</p>
	Housing - Affordable	<p>Is the existing policy fit for purpose?</p>	<p>The definition of 'self-build plots' for affordable housing needs to be clearer.</p>
		<p>Should tenure be made a more explicit part of housing land allocations?</p>	<p>No. This would really only be beneficial if the planning authority wanted to allocate a site wholly for affordable housing or have a higher percentage than that required by the Plan's affordable housing policy. Otherwise the requirement in the affordable housing policy is a better mechanism. Trying to be more specific on affordable tenure mix at site allocation stage is likely to be difficult, especially on larger sites to be developed over a long period, as the need for different affordable tenures may change over time.</p>
		<p>What factors should be taken into account in setting the contribution to affordable housing as a percentage of total homes being delivered?</p>	<p>Should the cap not relate to the proportion of affordable houses in an area rather than focusing only on new homes. Other factors to be considered are the housing need in the area and the total number and mix of existing housing – both in terms of type and affordable.</p>
		<p>Does the policy need to reflect different local circumstances?</p>	<p>Yes, planning authorities need to be able to vary the affordable housing policy to reflect local circumstances e.g. in a market area which has a high proportion of affordable housing the need might be for higher numbers of market housing rather than more affordable.</p>

		<p>SPP recognises that rural exceptions policies can be used to support sites for affordable housing that would not normally be used for housing. What more can be done to recognise the transformational role of housing in relation to the wider rural economy and the need to deliver untapped housing demand?</p>	<p>One of the main difficulties in being able to allocate a site entirely for affordable housing is being able to counter the argument that if a site is deemed suitable and appropriate for housing then why can it not be developed for a mix of both market and affordable housing. If there is a suggestion that housing – of any tenure – will be accepted the landowner is more likely to hold out for the potentially higher land value. One possible option could be to have a separate use class for affordable housing which would make it easier to prevent sites specifically allocated for affordable housing being lost to market housing. More needs to be done on the implementation of plans and strategies in terms of meeting rural housing need - more support should be available to communities to take forward community led housing in rural areas.</p>
	Housing - General	<p>Do we need to revisit the overall aim and objectives of our housing policy? Should policies continue to focus on delivering homes and the quantum of land available or are there a wider range of objectives and approaches that should be built into the policy?</p>	<p>The issue with focussing on delivery is that, whilst planning authorities can identify land in the most part they have little or no control over the rate at which that land is delivered. Agree that planning authorities need to review their existing land supply with each new LDP (perhaps more stringently than has been done in the past) but lack of delivery by the housing building industry should not be seen as a criticism of the planning system. Measuring the availability of land does provide a reality check on how much housing is possible in practical terms.</p>
		<p>How can a balance be struck between a plan-led approach and allowing authorities to respond to changing circumstances and local contexts?</p>	<p>Plan-led does not necessarily mean plan-led at a national level. Many issues are more appropriately left to local authorities through their LDP and this is also plan-led. Unclear what is meant by the term ‘accessible housing strategies’.</p>

		<p>What should be decided at different scales and stages? What should NPF do and what is the role of the local development plan? What should be set out in the evidence report and agreed at the gatecheck for local development plans?</p>	<p>NPF could usefully set standardised methodologies e.g. for calculating the Housing Land Requirement but not convinced that NPF should set the requirement itself. If this is done locally – to a prescribed method – then if significant changes arise e.g. increase in migration, then this can be reflected in an LDP review within the 10 year period. It would be harder to do this at a national level for all authorities. While planning has an important role there are frequently factors outside the role of planning which limits development of housing. For example, a slow rate of sales due to a 'flat' market can mean that it is not possible for a developer to secure funding to cover the costs of getting development underway.</p>
		<p>Should the 5 year effective land supply continue to be a means by which the effectiveness of plans is measured? What method should be used to calculate the land supply? Should the definition of 'effectiveness' be reconsidered?</p>	<p>The definition of effectiveness needs review in relation to the marketability criteria – just because volume housebuilders don't want to build in an area doesn't mean that the area doesn't need new houses. The effectiveness of the housing supply delivered in meeting the housing needs of the area should be the ultimate test of effectiveness of the housing land supply part of the LDP - there are also other aspects such as quality of environment etc. Agree that a legitimised calculation of land supply methodology – agreed at every step (including the assumptions made in the HNDA) is important to reduce appeals and challenges. Reduction in such appeals etc would be a desirable outcome of improvement in the process.</p>

	<p>How can we be clearer about what is being monitored to support an understanding of the dynamics of the housing land supply – homes delivered and / or land availability? How should progress be monitored and what action should be taken where it falls short of stated targets? Can we use mapped and audit information to secure a stronger emphasis on monitoring? What role should housing land audits play in establishing the land supply as implementation of the plan progresses? Can delivery be incentivised so that there is a closer correlation between the build rate predictions and actual completions?</p>	<p>Monitoring by planning authorities should relate to land availability as authorities don't control delivery on the majority of sites. LDPs should include a policy setting out the action which will be taken if availability falls short of stated targets. It would be useful to have this general policy response set out in NPF with scope for planning authorities to vary this if necessary, to reflect any particular local circumstances. This does need to be accompanied by a comprehensive review through LDPs of the deliverability of sites and getting away from just rolling sites into the next Plan because the landowner states an intention to build. Agree that the ultimate aim of audits should be to ensure a generous supply of land for housing. Agree that more use should be made of mapped information and audits for monitoring through delivery programmes. As abovementioned, in the most part completions aren't in the control of planning authorities. More correlation between predictions and actual completions will need much more comprehensive input from the development industry based on a more open and realistic discussion on the intentions of individual builders to progress sites. Should there be a restriction on the amount of land a developer can control - perhaps set through reference to past development rate by their organisation?</p>
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		<p>How should national planning policy approach the need to achieve more efficient use of land and infrastructure resources associated with the development of housing, e.g. maximising the use of urban/brownfield locations?</p>	<p>There can be a conflict between initiatives such as promoting the development of brownfield sites and maximising output of houses. Brownfield and / or urban sites are often more complex and costly to develop so these sites are often rejected by developers in favour of easier, quicker to develop greenfield sites. If the main emphasis is going to continue to be on the delivery of houses this is unlikely to sit well alongside a policy requiring the maximisation of urban and brownfield locations.</p>
		<p>How can we achieve a more effective system which ensures that the right land is allocated and then developed and that where this is not achieved, that action is taken.</p>	<p>It depends on what is meant by 'the right land'. A house builders view of 'the right land' may be different to where the planning authority considers housing is actually needed. As referred to in response to other questions, getting a consensus and agreement on 'the right land' at site allocation stage through LDPs will be crucial and will require realism on both sides as to which sites can – and will – progress and which won't. The need for critical review to ensure LDPs support effective sites may be impossible to achieve since circumstances and issues constantly change which can reduce the effectiveness of a site which was correctly deemed to be effective at the point of writing the LDP.</p>
			<p>Cross-boundary HMAs is tricky where affordable housing is concerned e.g. why would a Council prioritise investing funding available for their area to meet the housing needs of clients living in a separate Council area?</p> <p>The suggestion that 'a similar self-build / custom-built requirement should be included' along side a 25% affordable requirement needs clarifying – is the suggestion that self-build and custom build is included as affordable (frequently they are not) or does this suggest that about 25% of a site should be for self-build? If so, this does seem a high proportion?</p>

Housing - Specialist	Is the existing policy fit for purpose given the new legislative requirements?	Existing requirement for plans to address any need for HMOs, housing of service personnel and sites for people seeking self-build plots – don't think that this is specialist housing that is required in this situation, more that special arrangements may be required in allocations policies to ensure that this group has fair access to housing given their special position at the time of allocation.
	Does the policy need to be strengthened to set more consistent standards or requirements? If so, in what ways?	A housing mix policy can enable a planning authority to require a percentage of housing to meet specific needs but at the moment the emphasis is more on the authority being able to demonstrate that there is a cluster of such needs in the area. A policy at national level requiring a minimum percentage of the market units to be specialist housing or housing which is capable of adaption (similar to that for affordable housing) would help. Similar to the affordable housing policy this could be varied downward where appropriate.
	Given our housing policy commitments and projected population and household change, what further changes, or additions are required to ensure planning does all it can to support the delivery of housing to meet different needs?	The allocation of specific sites might assist in suppressing the land value which can be a hindrance to development of what tends to be relatively low-density housing.
	How can wider / general housing policy requirements support (or hinder) delivery of this policy objective?	It is anticipated that many of the issues identified in ancillary strategies such as housing for older people, and tackling loneliness and social isolation will be addressed through application of the place-making approach.
	Waste	How can the planning system help facilitate progress towards a circular economy in a way that delivers benefits for the environment, the economy and local communities?

WORK	Business/ Employment		<p>The Scottish economy is evolving and understanding of the potential structural changes from trends and events such as COVID 19 and the threats and opportunities should inform our local regional economic and spatial strategies. A national review and strategy would help inform local authorities' approach and our preparation of these strategies and should give consideration to any planning policy implications and principles including live work units. The national strategy should provide high level principles and allow regional/local strategies to be responsive to their situation.</p>
	Energy - Electricity		<ul style="list-style-type: none"> - The SPP Spatial framework for wind is a consistent and nationally-recognised guide for the development of large-scale wind development in Scotland. This spatial policy should remain in force to ensure consistency across Scotland for future wind projects, including new, repowered and extended schemes. It might be advantageous for NPF4 to provide steer for wind farm developers to engage with local authorities and other key stakeholders as early as possible to forward plan for their respective areas i.e. preparing landscape capacity studies. PKC is aware that various wind farm developers are exploring proposals for repowering and new schemes with local authorities early-on, and this is welcomed. - Concerning the Spatial Framework for Wind, should the Group 2 carbon rich soils consideration be extended to include Class 5 soils to incorporate SEPA concerns that these soils are an important asset that should be afforded protection in the wider interests of climate change? - Given the rise in number of proposals for battery storage to support grid operations, NPF4 should provide further policy coverage on the relevant considerations i.e. need for consideration of alternative sites, health & safety, etc.

	Energy - Heat		<ul style="list-style-type: none"> - Focus of NPF4 should be on low carbon heat opportunities generally rather than a focus on district heating. The experience in Scotland to date suggests that district heating – at scale - will be focused primarily to the main urban centres. The Heat Networks Bill (when passed) should support various aspects of district heating delivery but the reality for PKC is that DH is not viable at scale for many authorities due to the high density, mixed use nature of developments required. There is also a lot of time and resources, and capital funding, required to develop district heating schemes (as well as the reality of a lack of knowledge and expertise) and if there are other localised low carbon sources of heat that can be used this should be supported. - NPF4 should ensure that LDPs make suitable reference to LHEES process and how these two documents are expected to interface, including with Local Housing Strategies.
	Mineral Extraction	<p>How can NPF4 best ensure that sufficient materials are available to deliver planned and projected infrastructure and building projects, particularly within city regions in the absence of strategic development planning authorities?</p> <p>Is there still a need for a planning policy on opencast coal extraction?</p>	<p>Requirement for Minerals audit to verify that a ten year (or at least adequate) supply exists</p> <p>No requirement for an opencast coal extraction policy in Perth and Kinross</p>

Rural Development	<p>How can NPF policy criteria most effectively contribute to the Planning Act outcome of increasing the population of our rural areas, and in consideration of resettling of rural areas that have become depopulated?</p>	<p>NPF could continue the approach in the existing SPP to require planning authorities to promote development in rural areas that is appropriate to the character and challenges of each area e.g. to move away from a single standard approach to housing in the countryside across a whole council area, but the policy response to these areas should remain an LDP issue. A clear methodology for helping authorities to characterise the different parts of their area would be useful.</p> <p>A relaxation of housing in the countryside policy at LDP level is probably the most effective way to increase housing numbers in rural areas but the problem is that there are as many communities who don't want additional growth as there are those communities that do. Maybe this is a role for local place plans to identify those communities which would welcome more housing and have an LDP policy context which allows for this.</p> <p>Although the Scottish Government's desire to repopulate rural areas is acknowledged, it should also be recognised that a reduced population in those areas which are heavily dependent on private car use contributes to net zero carbon policies and so can have a positive rather than a negative impact.</p>
	<p>Which planning policies need to be more permissive to support sustainable rural development and help sustain and grow communities?</p>	<p>In the TAYplan area most development is to be directed to principal settlements and whilst there is provision for the development outwith principal settlements the focus is on meeting specific local needs rather than actively encouraging growth. A shift away from allowing development in rural areas in limited circumstances, towards an approach which actively promotes growth would be needed.</p> <p>A move away from a policy position of preventing the expansion of those settlements with an identified settlement boundary towards a more individual place-based approach would also help.</p>

		<p>Should national policy criteria be introduced to promote leisure accommodation, such as hutting and other recreational accommodation in rural areas?</p>	<p>A national view on hutting would be useful as this is a different type of leisure accommodation from the usual holiday / tourism accommodation which is often hired out rather than intended as being for the sole use of the owner. A further issue is that traditionally hutting in Scotland was a low-cost holiday / leisure accommodation option for those on low incomes living in urban areas. The reality though is that most people on low incomes are unlikely to have, or be able to buy, land on which to build a hut in the first place. One option could be the allocation of sites for huts in LDPs identified in collaboration with a willing landowner although this could be difficult to achieve given that higher land values / rentals are likely to be achieved through other forms of leisure accommodation such as chalets. The argument is perhaps similar to that for affordable / market housing – if a site is deemed suitable for residential then what incentive is there for a landowner to agree to an allocation for affordable housing when they could instead get a higher land value for market housing? It is also understood that Scottish Land and Estates are supportive of this, however, their preference is for individual or very small numbers of huts in a given area and therefore allocation is probably not practical.</p>
		<p>What policy criteria are needed to facilitate growth in the tourism sector in a way that is sustainable, particularly where activities will help support and sustain communities in rural areas?</p>	<p>Clearly there is much uncertainty as to the future for tourism and what recovery may look like post COVID-19. Hitherto, tourism policy nationally (and regionally and locally) has been increasing the emphasis on sustainability and a trend towards “responsible tourism” including greater acknowledgement of tourism impacts in an environmental and community context and commitment to wider ambitions in terms of a net zero society in line with wider economic development policy frameworks. This is articulated through the recently launched national strategy Scotland Outlook 2030 which will remain pertinent in the context of sector recovery but also evident within legislative frameworks e.g. powers to local authorities in terms of regulating short term lets. This means a focus on destination “management” as much as “marketing” and supporting “good growth” and, while the investment environment in a post COVID-19 situation is uncertain, the expectation will be that tourism development activity will correspond to higher standards and aim for enhanced green credentials. There are implications too in terms of the investment required in rural infrastructure to support growing market segments e.g. motorhome/campervans (and which may recover relatively early post COVID-19) while also protecting and enhancing natural assets and providing opportunities for business development in rural areas. The emerging policy criteria in NPF4 needs to provide a framework that enables rather than constrains.</p>

		What is the best way to balance demand for tourist accommodation with the need to ensure there is adequate and appropriate housing for rural populations?	Tourist accommodation may not be the main issue in some rural areas, rather it is the proportion of second and holiday homes that reduces the availability of housing and pushes prices up outwith the reach of local people. That said, second and holiday homes can also provide tourist accommodation. The question is therefore about balance which is not necessarily about restricting tourist accommodation, it's about finding a way to increase housing for rural populations.
		SPP recognises that rural exceptions policies can be used to support sites for affordable housing that would not normally be used for housing. What more can be done to recognise the transformational role of housing in relation to the wider rural economy and the need to deliver untapped housing demand?	One of the main difficulties in being able to allocate a site entirely for affordable housing is being able to counter the argument that if a site is deemed suitable and appropriate for housing then why can it not be developed for a mix of both market and affordable housing. If there is a suggestion that housing – of any tenure – will be accepted the landowner is more likely to hold out for the potentially higher land value. One possible option could be to have a separate use class for affordable housing which would allow sites to more easily be allocated for that specific use.
	Tourism	How best to afford protection to important tourism assets and ensure that local development plans and planning decisions recognise this importance?	NPF could require LDPs to identify the important tourism assets in their area with an associated policy presuming against change of use and setting out the criteria under which a change of use will be permitted e.g. along similar lines to the protection afforded to open space.

		<p>What is the best way to balance demand for tourist accommodation with the need to ensure there is adequate and appropriate housing for rural populations (taking into account associated policy developments around Short Term Lets)?</p>	<p>Tourist accommodation may not be the main issue in some rural areas, rather it is the proportion of second and holiday homes that reduces the availability of housing and pushes prices up outwith the reach of local people. That said, second and holiday homes can also provide tourist accommodation. The question is therefore about balance which is not necessarily about restricting tourist accommodation, it's about finding a way to increase housing for rural populations.</p>
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	Town Centres	<p>The impact of online retail, and other trends, and events such as Covid 19 will have on city/town centres is an area that could benefit from further consideration and direction at a national level. There is also a need for clarification on how we should provide support for night time economy and on sustainable transport options to support it. If there is to be a significant long-term contraction in traditional town centre uses such as retail, leisure, pub, and food and drink sectors then the vibrancy, vitality and viability of our centres would be compromised. To define an appropriate policy there needs to be an understanding of how these sectors will change. Identifying what support there is to address and support existing city/town centre uses is important, but also how they might evolve over the short to long term will be crucial. There is a need to identify what support and approach could ensure that transition is as painless as possible and also to provide guidance on any new opportunities.</p> <p>A national review of the future of town centre use sectors and discussion around their futures would be useful and save local authority duplication. Coming out of this review there should be some discussion for local authority consideration and national policy principles could be identified. These national policy principles would need to provide enough flexibility for local authorities to be responsive to their local situation to determine what is an appropriate response. Perhaps this national review might suggest approaches such as transitioning towards identifying smaller (sustainable) centres, and encouraging local policies which perhaps acknowledge when active uses within ground floor properties might no longer be possible such when as the vacancy rate exceeds 10% or when the existing business is not viable and it has been marketed for a reasonable period for a reasonable price (Angus LDP example) and when residential might then be appropriate. Policy would need to be pragmatic about the future whilst guarding against a short-term approach since sectors should hopefully rebound somewhat in the medium to long term. However, the least significant scenario is likely to include some long-term structural changes to our centres arising from habit forming consumer behaviour changes.</p> <p>NP4 should emphasise policy linkages and continuing commitment to the Town Centre First and Place Principle to support and encourage the location of retail and other services in city, town and neighbourhood centres.</p> <p>Equally a hierarchical place based approach to transport policy should continue to be promoted to encourage access and transport use focused on the use of city and town centres by people and access by a range of multi modal transport choices including car, bus and bike.</p> <p>The scale and extent of retail use will continue to be dependent on local consumer and visitor expenditure for both comparison and convenience shopping and local policy and land-use allocations should continue to be based on floorspace derived from expenditure analysis recognising this may result</p>
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			<p>in reduced allocation and promotion of alternative mixed uses based on analysis of expenditure online as well as in city, town and neighbourhood centres.</p> <p>NP4 should continue to acknowledge that the future use and success of city, town and neighbourhood centres is not wholly dependent on retail function. A flexible approach should be adopted to promote mixed uses and mixed- use developments incorporating a range of service, commercial, residential and cultural uses.</p> <p>Aligned to this is the need to continue to maintain and enhance the public realm through environmental improvements, digital and lighting infrastructure and public art and a policy framework that promotes and encourages public and private occupation of space and infrastructure through proactive city and town centre management</p> <p>Potential increased use of city and town centres for social interaction and support for the night time economy should be promoted and policies aligned to minimise impact on residential use through design mitigation and occupation conditions through complementary licensing regimes.</p>
PLACE	Air Quality	<p>What policies or changes are needed to ensure air quality is protected and improved? Are transport and placemaking policies currently sufficiently focused on air quality for example?</p>	<p>Air Quality is already a material consideration when determining planning applications, however policy should be more focused on ensuring all development makes a contribution towards improving air quality. Incentives as well as restrictive measures will be needed to make this happen. More Air Quality monitoring would also help characterise where poor air quality is predicted to become an issue in the future (perhaps due to development being consented now).</p>

	Climate Change		<ul style="list-style-type: none"> - NPF4, alongside other key documents e.g. Land Use Strategy, will have a pivotal role in the delivery of the Scot Govt’s climate change ambitions. NPF4 should take a holistic view on the key over-arching objectives for meeting the climate change challenge (and links with other key policy areas) whilst at the same time provide a strong policy framework for delivering sustainable development on the ground that addresses the climate emergency including how to build in resilience in new development. - It is encouraging to see progress on % of electricity production in Scotland achieved through renewable sources however national planning policy needs to deliver a strong policy framework to support the roll-out of electric vehicles as a means of meeting CO2 reduction targets through transport interventions – one of the key sectors currently contributing to CO2 emissions. - Planning policy should be informed by, and be supportive of, wider ‘energy systems’ thinking (Scot Govt Local Energy Systems Consultation Document) to promote the delivery of a wide range of social, economic and environmental benefits from plans and projects. The holistic, cross-cutting nature of LDPs and RSSs should help realise where there are wider energy issues that can tackled collectively rather than individually i.e. local energy generation/use/EV infrastructure. Aligning closely with DNO Business and Energy planning should help to forward plan where there may be grid or other constraints. - In relation to Electric Vehicles and charging points there needs to be clarity with Building Regs with regard to charging points for new housing developments. Confusion should be avoided - for houses (not flats) the requirement for EV charging for houses should be imbedded in Building Regs. - Should NPF4 be stronger on the re-use of existing buildings/brownfield land i.e. brownfield-first policy, to limit the release of greenfield sites? It is acknowledged that a brownfield-first policy may present significant challenges to the housing market however land use is a significant component of the strategy for dealing with the challenges of climate change and such a shift in policy could bring multiple benefits across society. - Should NPF4 have a strong presumption in favour of renewable/low carbon energy generation on site for new developments where any impacts of such technologies are not considered to be significant? - The uncertainty around the future of the gas network will require to be addressed in NPF4 to ensure that there is suitable policy flexibility in relation to how this sector of the energy market will adapt over the next 5-10 years as well as ensuring low carbon solutions are optimised but at the same time not comprising development viability.
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	Flooding		<p>Perth and Kinross Council is supportive of the general flood risk policy approach as set out in SPP but considers clarification and minor amendment of the policy approach for areas behind Flood Protection Schemes (FPS) would be appropriate. With regards to clarification on approach for development behind a FPS, SPP 2014 does not clearly define an appropriate standard FPS. This should be addressed in NPF4, and defined as 1 in 200 year plus freeboard, whilst acknowledging that climate change would need to be addressed through development design including raised finished floor levels. In terms of modification where there is an appropriate standard FPS, vulnerability and the presumption against civil infrastructure and the most vulnerable uses within the medium to high risk areas could also be reconsidered with cognisance of the specific vulnerability within that catchment.</p> <p>This is a key planning issue and detailed comments on why this approach is sought are provided in a separate Development behind Flood Protection Schemes paper.</p>
	Green Belts	How prescriptive should NPF4 be in identifying the issues for planning authorities to consider when designating green belts in local development plans and determining planning applications?	If green belts are to be retained, then these should continue to be viewed as regionally important and as such the criteria for designation and issues to be considered in determining planning applications should continue to be set at a higher level to ensure consistency of approach. It is particularly important that NPF is specific and clear about the uses which will and will not be acceptable within green belt areas.
		Should NPF4 / regional spatial strategies have a role in identifying green belts? Or should this be left to local development plans?	The identification of boundaries should be left to LDPs unless there are cross-boundary issues to be considered in which case it may be more appropriate for it to be identified within the RSS and then transferred into individual LDPs.

	Historic Environment	<p>Are existing policies sufficient to safeguard Scotland’s valuable historic environment assets and to manage potential conflicts with other interests? If not, what changes are needed?</p> <p>How can NPF4 best complement existing historic environmental legislation, strategies and guidance, including that from other national bodies?</p>	<p>The policies are generally working and cover the key issues regarding the historic environment. There are a couple of areas that could do with more clarification.</p> <p>The issue regarding other historic assets is still ambiguous – how are these identified? How can they be weighted when assessing an application if there is no specific way of identifying them? It’s important that other historic assets are recognised particularly in terms of placemaking and identity but if they are not identified, with limited resources in terms of expert input, how can planners make an informed decision. However, how can local authorities identify regionally important assets when so little resource is now put into the historic environment?</p> <p>The issue of enablement for listed buildings is also an issue. Further guidance of appropriate enablement and examples would be helpful.</p>
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	Natural Environment	<p>Key Objective: to protect, enhance and promote access to our natural environment; whilst supporting their [sic] sustainable use and securing positive effects for biodiversity when considering new development. This includes identifying and affording protection to international, national and locally designated areas and sites in development plans and development management including having regards to the desirability of preserving peatland</p>	<p>While protection of biodiversity is indicated in Scottish Planning Policy and local policy, it is not consistently integrated in planning practice, and is often restricted to consideration of European Protected Species. To recognise the biodiversity crisis, protection and enhancement of biodiversity needs to be clearly set forward in the key objective rather than as implied as part of a broad natural environment statement and not limited to “positive effects”. Securing positive effects for biodiversity is strongly supported but is a vague term that needs to be clearly defined in planning policy to ensure measures are not just token greenwashing. Halting the decline of biodiversity has not yet been achieved so the need to protect existing habitats and connectivity, as well as securing positive effects, needs to be retained as a stated goal. Protection and enhancement needs to extend beyond protected species and sites to promotion of habitats and connectivity based on professional assessment of sites and consideration of the wider ecosystem beyond the site boundary. All development is able to benefit biodiversity through small changes such as avoiding fragmentation, using native planting, providing resources for breeding birds, bats, amphibians and pollinators and ensuring connectivity through a development. But this will not be realised unless direction is clear. The designation and protection of identified sites and peatland is supported and is essential, however this can no longer be seen as the main vehicle for promotion of the conservation of biodiversity.</p>
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		<p>How can NPF4 help secure positive effects for biodiversity from new development most effectively?</p>	<p>“Positive effects” is too vague to avoid continued loss of biodiversity and should be clearly defined as no net loss or net gain. A no net loss of biodiversity is the minimum that should be required under national planning policy and is achievable given most development is directed to arable or brownfield land with effective application of the established mitigation hierarchy. Even household applications can achieve no net loss by ensuring minor effects are avoided or mitigated. In Perth & Kinross we have had success requesting swift and bat bricks in new builds, measures to promote wildlife connectivity and improving planting schemes but usually at the request of the biodiversity officer. A national direction would help to standardise a no net loss or net gain approach across planning authority areas. Currently many positive measures are difficult to require by condition. National guidance as to the interpretation of the principles for conditions of “necessary” and “relevant to the development” could assist in ensuring measures are enforceable.</p> <p>Net gain has been introduced in England planning policy. It would be unfortunate that Scotland does not meet this standard. The methodology is already established with a relatively simple assessment of habitats on site. This upfront assessment would also promote appropriate surveys are undertaken to inform design. Principles for compensation should also be considered to ensure that compensation is a last resort and adequately compensates for the lost resource.</p> <p>Additional guidance may be needed to inform a net gain or no net loss approach. Designing Places should be reviewed to promote biodiversity and the natural environment. Where offsite compensation is appropriate, this may be through a Council run Green Infrastructure fund which would also require separate guidance.</p>

		<p>How can NPF4 best complement existing environmental legislation, strategies and guidance, including that from other national bodies.</p>	<p>NPF4 must be compatible with existing environmental legislation etc and can provide guidance as to how they apply to planning. Reference to other strategies should be made where they are relevant but realistically NPF4 should be able to be used without reference to multiple external documents. The place of Local Biodiversity Action Plans should also be recognised as these are regional documents which development can contribute to or hinder.</p>
		<p>How do we balance; the need to protect our natural environment assets with other policy ambitions (e.g. Delivering Renewable Energy) and pressures arising from tourism, rural housing affordability or other development types?</p>	<p>Balancing is part of the planning system. Provided the natural environment is given the importance that it is warranted and (with the exception of landscape) has not been given in mainstream policy, there may be overriding objectives that can be dealt with at a local level.</p>

Placemaking	<p>Is there scope to make more of this policy area in order to encourage planning to actively enable the delivery of high-quality development?</p>	<p>While SPP states that proposals may be refused on placemaking grounds only, this is still relatively rare, and Planning Authorities have varying levels of confidence in applying this. Tying in placemaking with public health objectives, biodiversity and climate change mitigation could help emphasise its importance and tackle the perception that placemaking and design is about aesthetics.</p> <p>Strengthening the policy wording and providing more clarity on some criteria would be useful E.g. how to interpret and enforce the `distinctiveness` principle where development is dominated by mass house building?</p> <p>Another challenge is objectively assessing proposals with regards to these criteria. Some local authorities have their own `Placemaking Audit` process which helps identify aspects of proposals that require improvement.</p> <p>Policy could do with being more focused on health and wellbeing – it should have a far greater focus on how important placemaking is in terms of creating places that people can enjoy living in. There needs to be a clear correlation between the choices we make in terms of planning and the impacts this has on health and wellbeing. If we don't make places easy to walk around then people use cars, if we don't provide access to attractive open space, people won't exercise, if we don't give children safe places to play, they grow up with barriers that impact on their imagination. Essentially almost every issue relates to the health and wellbeing of the population.</p>
	<p>Does the climate change emergency mean that the policy needs strengthening or revision?</p>	<p>Greater connections and correlations should be made with climate change policy – these are not two separate issues. If we are to deliver good placemaking, this should also be ensuring that we are touching the planet lightly, that we are allowing for longevity in our decisions, not simply the short-term economic benefits of a development.</p>
	<p>How can placemaking policies support other policies, such as housing and green infrastructure, to meet the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people?</p>	<p>More targeted assessment tools such as the Building with Nature standards could also be promoted to support GI and biodiversity policy aims as well as placemaking.</p> <p>NPF4 should address how planning can create places which meet the needs of different generations, especially young people and the elderly. There is a lot of discussion and best practice being developed around this topic which could be highlighted and encouraged. NPF4 could encourage intergenerational housing, play streets and integrate the `caring place` principles developed by Architecture and Design Scotland, with Placemaking and other policies.</p>