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Dear NPF4 Team

National Planning Framework 4 (NPF4)

SEPA welcomes the opportunity to present its ideas for National Planning Framework 4 (NPF4). Never before has there been a more crucial time to bring forward a radical, innovative NPF4 to support a green, societal and just recovery which addresses the environment and climate emergency, and steers the country towards a sustainable and inclusive economy that works for all of Scotland. SEPA is fully committed to supporting this agenda.

If NPF4 is to realise its transformational ambition, all those who interact with it have a collective obligation to improve the impact of our combined energy, resources and investment. New ways of working can support a shared culture and mindset – even stronger leadership, improved understanding, shared skills and confidence to deliver. The Place Principle is a step in the right direction - a more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place. Embedding the Place Principle in NPF4 and its delivery programme could help accelerate pace.

When NPF4 sets the direction for development in Scotland over the next 10 years, the outcomes will be long-lasting. There is an incredible opportunity for NPF4 to help Scotland fully embrace net zero in a way that delivers against Scotland's National Performance Framework Outcomes. NPF4 could reset spatial planning and development in Scotland, and foster a whole-system call to action where everyone plays a part in securing a thriving, inclusive net zero Scotland. We must do this now and do it well. Collaboration and partnerships will be pivotal to success.

SEPA has framed its response around four cross-cutting and inter-related ideas that it believes can help deliver transformation. These are outlined below, and specific policy-related ideas are set out in Appendix One. Many of our ideas and suggestions are ambitious. However, with a shared ambition and collective will to work in new and innovative ways, these opportunities could pave the way towards even stronger alignment of public resources - which supports a green, societal recovery and significantly reduces future risks and liabilities for all of Scotland.



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Idea One: A framework for a Circular Economy Approach to Places

In such unprecedented times, NPF4 presents a significant opportunity to signal that the country can manage the development and use of land in the long term public interest in ways which help all of Scotland prosper within the resources of our one planet. The concept of prospering within the resources of our one planet underpins SEPA's Regulatory Strategy, [One Planet Prosperity](#) (2016) and Scottish Government's Environment Strategy for Scotland (2020). This in itself could make NPF4 transformational. An overarching spatial strategy informed by sound science, circular economy principles, and robust, practical decision-making metrics could be a further, positive step. Integrating circular economy principles in NPF4 could provide an opportunity to ensure that the design (and re-design) of places reduces Scotland's call on natural resources and keeps assets flowing through the economy at as high a value as possible for as long as possible. This in turn could support thriving, liveable, resilient places in Scotland.

Idea Two: A framework for Zero Carbon Places

One of the most significant challenges for NPF4 is to provide a powerful and effective policy response to the Climate Emergency and, in doing so, provide a just transition to Scotland's net zero by 2045 ambition. NPF4 can lay strong foundations to ensure Scotland is on the right track over the next 10 years. Key to this will be securing the right development in the right place, zero carbon and future-proofed design and a circular economy approach to resources and place. NPF4 can also provide a positive framework that facilitates innovation in low and zero carbon technology, providing enough flexibility to respond to new technologies. Recent events have heightened the importance of this whole area.

Idea Three: A framework for Green Resilient Places

Scotland faces unprecedented challenges in adapting to changes in our climate - changes we are already experiencing and which are expected to intensify throughout the NPF4 period up to 2050 and beyond. One of the most powerful ways NPF4 can deliver future resilience to climate change, in ways that supports quality of life and health and wellbeing, is to facilitate a strategic, comprehensive and systematic approach to planning and delivering green and blue infrastructure as an integral element of place - from national to site level. This would not only help to reduce significant pressures on our water management infrastructure but could deliver multiple benefits for local communities - such as improving connectivity and active travel and bringing vacant and derelict land back into productive use.

Idea Four: A framework for Flood Adapted Places

Currently around 284,000 properties are at medium risk of flooding in Scotland; by the 2080s this could increase by 110,000 properties due solely to the impact of climate change on flooding. Moving forwards it will be vital that our places evolve to ensure that we are not increasing flood risk across Scotland. And in doing so, we manage future risk in a way that protects our communities and inspires confidence to invest in our cities and towns. Understanding the potential future impacts of climate change on flood risk is key to achieving this and something which the policy framework in NPF4 could usefully support.

In presenting these four ideas which span multiple planning policy topic areas, SEPA has tried to address questions posed by Government as part of the Call for Ideas – both in terms of the overarching questions and those relating to the individual topic areas themselves. SEPA's policy-related suggestions in Appendix One are supplemented by ideas for candidate National Developments in Appendix Two using the pro-forma provided by Government. These include ideas to roll forward existing National Developments which directly relate to SEPA's core functions, plus some initial ideas for candidate National Developments which could assist Scotland's direction of travel over the next 10 years.

SEPA recognises that this is very much the start of the journey for NPF4 and would like to emphasise its continued commitment to work with Government and others to help develop, refine and hopefully deliver these ideas. In the meantime if you require further information regarding this response, please contact Katherine Lakeman on 01738 448191 or Lesley Duncan on 01786 452644.

Yours sincerely



John Kenny
Chief Officer Circular Economy

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