

# **Planning for Scotland in 2050**

## **National Planning Framework 4:**

### **Integrated Impact Assessment**

Update – November 2020



Scottish Government  
Riaghaltas na h-Alba  
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# 1. Introduction

1.1.1 Earlier this year we published our NPF4 - Integrated Impact Assessment (IIA): Screening / Scoping Report,<sup>1</sup> (the '2020 Scoping Report') to inform the early engagement and Call for Ideas stages of the NPF4 preparation process. We also published our NPF4: Integrated Impact Assessment 'Easy Read Guide'<sup>2</sup>. Since then we have:

- Begun work to update our evidence base taking into account responses received<sup>3</sup> through the Call for Ideas;
- Considered whether and where any remaining evidence gaps may arise and where further data may be required;
- Updated our IIA methodology and timeline to align with recent changes to the overall timetable for NPF4.
- Begun our early assessment work, to inform the NPF4 preparation process.

Further details of this work are set out below.

## 1.2 Covid-19

1.2.1 The COVID-19 pandemic has changed the way we live, work, and travel in Scotland. This Update is being published alongside our NPF4 Position Statement, which reflects on the impacts of COVID-19 and what NPF4 can do to help societal and economic recovery.

1.2.2 With regards to our impact assessment work, the Planning (Scotland) Act 2019 requires Scottish Ministers to bring forward new provisions on the assessment of the likely health effects for national or major developments. To inform this work we will consider the likely health effects of proposed national developments as part of our IIA process. To ensure that public health considerations are fully embedded into the plan-making process, and so that emerging relevant data on the Covid-19 pandemic can be taken into account, where relevant, we are also engaging with Public Health Scotland (PHS) and will consult PHS on our IIA alongside the statutory Consultation Authorities (SEPA, NatureScot and HES).

## 1.3 NPF4 – our updated timetable

1.3.1 We had anticipated laying a draft NPF4 in the Scottish Parliament in September 2020, but given the impact of COVID-19 and many people's and organisations' capacity at the moment, delay has been unavoidable and we now anticipating laying a draft in Parliament in Autumn 2021. Our revised NPF4 timetable offers additional

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<sup>1</sup> <https://www.transformingplanning.scot/media/1293/national-planning-framework-4-integrated-impact-assessment-scoping-report.pdf>

<sup>2</sup> <https://www.transformingplanning.scot/media/1133/npf4-guide-to-integrated-impact-assessment.pdf>

<sup>3</sup> <https://www.gov.scot/publications/npf4-analysis-reponses-call-ideas/>

scope to further embed the IIA into the draft NPF4 preparation process, ensuring early assessment outputs can inform, and help shape, the emerging draft NPF4. The following sections of this report give further details.

**Table 1. NPF4 - revised timetable and IIA outputs**

| NPF 4 Stage   | IIA Stage                               | IIA Outputs  |
|---|---|--|
| <b>Baseline data gathering</b>                          |   |  |
| Early Engagement / Evidence Gathering: ‘Call for Ideas’ | Screening / Scoping                     | <ul style="list-style-type: none"> <li>- IIA Easy Read Guide</li> <li>- IIA Scoping Report: February 2020</li> <li>- IIA Scoping Report – Appendix A – Environment – Baseline information</li> <li>- IIA Scoping Report – Appendix B – Society &amp; Equalities</li> </ul> |
| <b>Position Statement</b>                               | <b>IIA - iterative assessment stage</b> | <ul style="list-style-type: none"> <li>- IIA: Update November 2020</li> <li>- Habitats Regulations Appraisal: Baseline Information Report</li> <li>- Data Protection Impact Assessment (DPIA) Report</li> </ul>  |
| Consult on draft NPF4 and introduce to Parliament       | Consultation                            | - IIA report(s) on assessment findings (Autumn 2021)   |
| Analyse comments received and finalise NPF4             |   | Finalised BRIA<br>Post-Adoption Statement (Spring 2022)  |

## 2. Environment

### 2.1 Comments on the 2020 Scoping report

2.1.1 We are reviewing comments received on the 2020 Scoping report, including detailed comments from the SEA consultation authorities (SEPA, NatureScot and HES). We are also engaging with Public Health Scotland (PHS) to inform our assessments. Where comments relate to the environmental baseline, we will update this accordingly. We will also continue to engage with the consultation authorities and with PHS on possible further refinements to the SEA objectives, and in presenting our assessment findings we will seek to draw out opportunities for enhancement, where relevant. The consultation authorities also commented that it would be helpful to have more information on how the baseline information contained in the scoping report will help to inform the preparation of NPF4 and we have addressed this point further below.

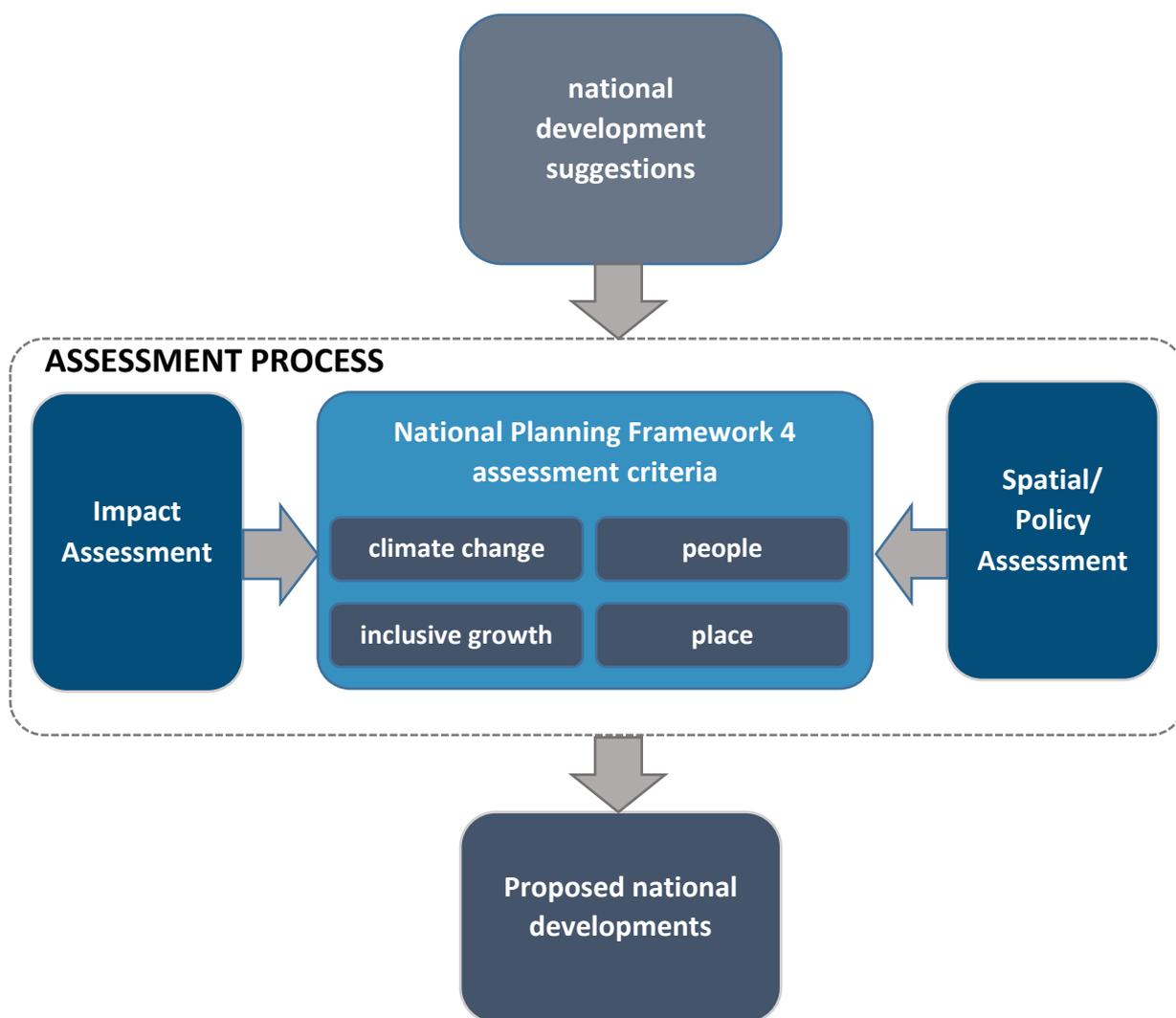
### 2.2 Update and changes to methodology

2.2.1 In our 2020 scoping report we set out four broad SEA assessment stages of:

- Stage 1 - Strategic level assessment/planning policy
- Stage 2 - Regional assessment
- Stage 3 - National developments assessment
- Stage 4 - Cumulative effects assessment

2.2.2 Taking into account the revised NPF4 timeline, we have brought forward our assessment of the national development proposals coming out of the call for ideas, and this work is now underway. By front-loading this aspect of our SEA assessment, which is itself taking place alongside the Habitats Regulations Appraisal screening process and consideration of equalities impacts, we can ensure that early and emerging assessment findings can help to inform and guide the selection of proposed national developments. We will also use this iterative assessment process as work on the spatial and policy content of NPF4 progresses, informed by the baseline information and the key pressures and trends identified.

2.2.3 As part of our SEA we will also commission an independent assessment of the likely impact of each proposed national development's lifecycle greenhouse gas emissions on achieving national greenhouse gas emissions reductions targets.



**Figure 1. Assessment of national development Proposals**

## 2.3 Habitats Regulations Appraisal

2.3.1 We have commissioned independent consultants AECOM to undertake the Habitats Regulations Appraisal (HRA) of NPF4, and work on screening national development suggestions is now underway. The screening process and subsequent assessment, where applicable, will be informed by the Habitats Regulations Appraisal of NPF4 – Baseline Information Report, which we are publishing as Appendix A to this document.

## 3. Society and Equalities

### 3.1 Comments on the 2020 Scoping report

3.1.1 The independent analysis of responses to the NPF4 Call for Ideas noted that the inclusion of ‘improving equality and eliminating discrimination’ as a stand-alone outcome to NPF4 was welcomed.

3.1.2 The need to consider cross-cutting themes of age, disability, race, religion or belief, sex, sexual orientation, gender reassignment and socio-economic disadvantage was highlighted, and there was a call for links to be made to equality and poverty-related policies nationally, regionally and locally. There was also a call for the Scottish Government to use evidence based assessments to aid strategic thinking, outcome and priority-setting, and action planning. The need for specific, evidence-based equality outcomes which address different protected characteristic groups in relation to planning was referenced.

## 3.2 Update and next steps

3.2.1 Taking into account the revised NPF4 timeline, we have brought forward our assessment of national development suggestions and will ensure that our early emerging impact assessment findings help inform and guide emerging proposals. Assessments will be informed by updated data from the IIA where relevant (see below), including the 2020 iteration of the Scottish Index of Multiple Deprivation and the Scottish Government assessment of the potential spatial vulnerability of places across Scotland to Brexit<sup>4</sup>. The following broad questions will help guide our early assessment work, including on the assessment of national development proposals:

- Will the policy / strategy / proposal help to improve equality and eliminate discrimination plus reduce poverty and inequality across Scotland?
- Will the policy / strategy / proposal support health, wellbeing, and quality of life in our current and future population?

3.2.2 In our 2020 Scoping Report we set out our intention to invite representative groups based on the list of protected characteristics to a roundtable discussion with the NPF4 team in Spring 2020. That discussion was curtailed due to restrictions on public meetings. We now plan to undertake an initial virtual meeting in January 2021, extending the invitation to cover wider areas around inequalities and address planning's role in tackling such matters. We will take this opportunity to investigate the scope for specific, evidence-based in/equality outcomes which address different groups in relation to planning.

## 3.3 Data and evidence gaps

3.3.1 A wide range of updated data has been published or become available since the publication of the 2020 Scoping report, and this will be taken into account. Updated data includes:

- Population projections and estimates
- Scottish Household Survey (2020)
- COVID-19 health and social impacts

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<sup>4</sup> <https://www.gov.scot/publications/local-level-brex-it-vulnerabilities-scotland-brex-it-vulnerabilities-index-bvi/>

- Data on the lived experiences of disabled people and BAME people
- An evidence review on the Accommodation needs of Gypsy/Travellers
- RTPI practice notes on dementia / mental health and town planning
- Potential social impacts of Brexit

3.3.2 We obtained limited additional evidence on issues that may impact on people’s Human Rights in Scotland. However, it should be noted that in September 2020, the Scottish Government introduced the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill into the Scottish Parliament. The aim of the Bill is to incorporate the United Nations Convention on the Rights of the Child (UNCRC) into the law in Scotland. The UNCRC is an international human rights treaty that covers all aspects of children’s lives, including civil, political, economic and cultural rights.

3.3.3 We will continue to work to alleviate the evidence gaps identified in the 2020 Scoping report. We will use the consultation period and the proposed January 2021 virtual meeting (see paragraph 3.2.2 above) to seek to address those gaps.

### **3.4 Island Communities Impact Assessment**

3.4.1 The call for ideas highlighted a number of policy areas where our Island communities are facing unique challenges, including issues around housing, population decline, coastal planning and the need to ensure that local services meet the needs of communities and businesses. Some respondents highlighted the recommendations made in the Island Communities Impact Assessment that accompanied the 2019 Act. We will take these recommendations and the character and needs of island communities into account when preparing NPF4, and will policy proof our Islands Communities Impact Assessment of NPF4 with relevant stakeholders.

### **3.5 Data Protection Impact Assessment**

3.5.1 Under the General Data Protection Regulation (GDPR) the Scottish Government is to complete a data protection impact assessment (DPIA) for all projects involving personal data and privacy. We have published our assessment of the National Planning Framework 4 and associated consultations online.

## 4. Economy

### 4.1 Comments received

4.1.1 The independent analysis of responses to the call for ideas highlights comments made about the importance of NPF4 supporting jobs and the economy, particularly in growing economies linked to “green” sectors including the need to replace jobs lost in fossil fuel-based industries. The challenges to our towns and cities of a growing online economy was also highlighted, and there was recognition of a shifting consumer preference for locally produced goods and services.

### 4.2 Update and next steps

4.2.1 The 2020 Scoping report set out our intention to undertake a BRIA to assess costs, benefits and risks that may arise as a result of policy changes included in NPF4. Taking into account the revised NPF4 timeline, we have brought forward our assessment of the national development proposals coming out of the call for ideas. This will include consideration as to whether the policy / strategy / proposal will contribute to sustainable and inclusive economic growth.

### 4.3 Data and evidence gaps

4.3.1 The Position Statement sets out potential policy changes to NPF4 that are currently being considered. The following sectors may be impacted by some of these proposals:

- Developers (including business / landowners / communities / individuals);
- Public sector (including the Scottish Government and local authorities and key agencies);
- Organisations (including charity and voluntary) in third sector.

We will continue to evaluate the impact of our draft policy proposals on the above sectors as they are developed and will undertake bespoke discussions with individual representatives of those sectors most likely to be impacted by the proposals.

## 5. Next steps

- 5.1.1 The Position Statement gives an idea of our current thinking taking into account evidence gathered through the Call for Ideas earlier in 2020. We welcome comments on this update and on our NPF4 Position Statement by 19 February 2021. Further information about how to submit comments is available at <http://www.transformingplanning.scot/>.
- 5.1.2 We acknowledge that there is still a lot of work to be done to shape and refine our thinking before we set out a full draft NPF4 for further consultation and scrutiny in Autumn 2021. This will be taken forward as the fuller content of the draft strategy and policies emerges in the months ahead. We will continue to update stakeholders on progress through our [website](#) and in updates to our Programme for Engagement.