

National Planning Framework 4: Position Statement

Report of discussion events for community groups

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www.pas.org.uk

Planning Aid for Scotland, known as PAS

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1. Introduction

PAS (www.pas.org.uk) was commissioned in February 2021 by the Scottish Government to deliver a series of events to hear the views of community councils and community groups with regard to the National Planning Framework 4 (NPF4) Position Statement, and to provide the Scottish Government with a report of what was discussed at the events.

2. Aims

The project aims were identified as below:

- to provide the Scottish Government with access to the views of community council and community group representatives
- to record views expressed in a report which could inform the next stages of NPF4 preparation
- to encourage participants to respond effectively to the NPF4 Position Statement
- to deliver effective and well-facilitated events offering every participant the opportunity to contribute

3. Project Structure

PAS initially intended to deliver three 90-minute discussion events with around 25 participants per event. Due to a high level of interest, two additional events were added. The events took place on the following dates: 1 February, 3 February, 9 February and 16 February (2 events). Events took place at a range of times to increase opportunities to attend. Participants were advised that events would be recorded (for PAS reporting purposes only), and that a non-attributed report would be provided for the Scottish Government. They were also advised that the final report would be circulated to all participants.

4. Format of Events

Events were held virtually using the Zoom video conferencing platform. Three PAS staff members were involved in delivering each event. Visual resources were prepared to provide context and structure to the events, and to prompt effective discussion. At the start, objectives and Zoom housekeeping principles were set out, followed by a contextual overview of NPF4, the Position Statement and its content, and how to respond. PAS staff then facilitated group discussion around the four key

Position Statement themes, with a focus on enabling everyone to contribute. A final activity invited participants to share their “One Big Idea for NPF4” verbally or by using the Zoom chat function.

5. Publicity

Events were publicised through dissemination to community council liaison officers (or equivalent positions) in every local authority, through PAS bulletins and social media, through PAS staff and relevant previous project networks, and through other organisational bulletins.

6. Participants

In total, PAS received expressions of interest in attending from 166 community council/community group representatives. Not all of these were able to attend and at each event there was a certain level of non-attendance from those who had registered.

7. Reporting

Event recordings and saved Zoom chat transcripts were transcribed by PAS under the four key themes of the Position Statement. The event reports that follow aim to record as closely as possible points made by participants. Where necessary some editing has taken place for clarity and brevity. In addition, references to specific places or local authorities have been anonymised.

8. Report of Event 1

Net Zero Emissions:

- A lot of people had a positive/satisfactory experience in that during the Covid pandemic travel habits changed as they did not have to commute to work.
- Also, transformation from big open space offices to amalgamated small private offices.
- A big thing is levelling up, working from home is divisive, white collar workers can afford it but a lot of people cannot.
- There needs to be balance between those moving to attractive rural areas and those already living there.
- Green fuel for transport (hydrogen/ammonia) produced by green processes.
- Nationally, it has been missed that there is opportunity to increase renewable energy production, short term that is the only way to reach net zero. The Position Statement does not cover tidal production, but should be explored more. Locally, we need to change our habits – the Position Statement only refers to rural but is applicable to urban.
- Transport currently does not serve communities, need for work in partnerships, i.e., public transport providers (often private/commercial) should be consulting communities to move away from the current status quo.
- Extensive use of electricity via batteries, production of batteries is not environmentally-friendly.
- Travelling – lack of use of public transport. Home working is not the case for all. Solution has to rethink public and rapid transport. International examples – reclaim land/derelict etc.
- Zero emissions – first analyse where people work, people may start work before the public transport times start.
- Drivers using combustion engines should be eliminated from town centres or pay tax.

Resilient Communities

- 20-min neighbourhood is a good idea ... considering if you have work and green spaces. Often there is no major hospital/mental health/medical services.
- No shop, no community centre, post office is not always open ... has to be addressed and funded by government.
- Partnership working – both sides have to listen, communities need to be aware of what is suggested/proposed and work together. Large developers often don't listen to community councils but community councils don't often listen too.
- Community councils need local administration ... centralised local authorities ... voluntary action should be limited and not attempt to step in to all actions.
- If there are good connections, places feel less rural. Equally need to avoid feeling like dormitory areas.

- Planning needs to recognise that big companies cannot just step in with big proposals, there needs to be demand from the community.
- New developments from private firms often end up as soulless places. Any new development should provide health impacts study.
- Community-based partnership ... communities should have more advice and help ... they are the experts on their area ... that advice should be channelled. Local authorities need to listen to the communities.
- Being a community council member can take a lot of time to aim to stop large developments.
- It is difficult to develop a sense of belonging as the small towns can feel just like a dormitory to the bigger towns where people commute for jobs.
- Huge concentration of construction companies and big companies, communities don't have as much say against them. Government needs to promote smaller building companies that will serve the communities.
- Local people create a sense of belonging ... an influx of new residents can create pressures. Cities are made up from villages and village halls are where the action is.
- 20 minute neighbourhoods ... developers only providing residential, lack of offices/commercial, promote mix use.

Better, Greener Places

- Playparks/football pitches often get shut, funding stops and no maintenance to the parks but also access to them (paths etc), access through crossing a road.
- Core paths need maintenance, local authority sometimes don't have power or funding to maintain.
- Contaminated land locally appeared to have right for any development without planning permission.
- Places with rich biodiversity should be protected.
- New housing estates should have solar panels, charging points and internet connection.

Wellbeing Economy

- Change attitude on wellbeing and how to address it. One of the community hubs does social prescribing – (in partnership with local GPs and community gardens) reaching out to people who are isolated, instead of giving them pills they are directed to a person to spend time with and going outside – change of attitude be beneficial.
- Companies need to believe that their development proposals are in the public and local community interest before approaching communities.
- Work-life balance: place to go for lunch hour and spend their free time.
- Social supermarket – giving food to people who need it, not for profit.
- Economy should not constantly need to grow with new stuff, more attention to how to maintain it. We need to earn within our means and accept limitations.

One Big Idea for NPF4

- We need mix of housing tenures provided by the local authorities – planning does not facilitate that.
- The policy documents are way too difficult to read for members of the public.
- Student flats drive up land price for social housing etc.
- Local authorities should be smaller so there is better/faster/effective decision-making.

9. Report of Event 2

Net Zero Emissions:

- Re-purposing of buildings & circular economy: previously offices being turned into flats. The current planning system does not provide any scrutiny of the environmental impact of demolishing buildings.
- You can reduce carbon emissions by reducing need to drive, but that is assuming public transport is good enough to move away from the private car. Living in small villages/settlements where the supermarket is miles away and there is an elderly population, public transport does not support this. The key is to show people these issues are inter-related.
- There are 20-minute villages already, a lot of us choose to not walk but rather jump in the car. It is about the education, a lot of it is not getting through. Education about this needs to be thought through to deliver it properly.
- Work places need to be more local.
- In a large city context – buses to be re-regulated; the system is not functioning and integrated – get an Oyster-style card.
- Different criteria apply on each area; within cities, bus system should be completely electric. Electric cars need more charging points. Air pollution caused by cars in cities is not an issue in rural Scotland. Smaller villages/rural areas depend on cars – to get to hospital you need to get on at least two buses. As a smaller town around 10k inhabitants has only a few charging points, often used by taxi drivers.
- Hospitals – often accessible only via at least two bus providers.
- We need to build better post-pandemic. Example: a key bus route in the town centre of a large city local authority has tunnel effect for carbon emissions, during the pandemic the air was pure. Post-pandemic, it will get worse again. We have to build better for the future generations.
- The Scottish Government and policy must look at the existing resources and protect and conserve natural resources. Removal of green belt, removal of trees is unacceptable. The Scottish Government has to take back control and remove power from mass housing developers who are only determined to build where they want.
- Benefits of home-working: we should promote part-time office working in the future as the environment benefits. Lack of traffic coming to city centre is also a benefit.
- Windfarms: we should be going forward to self-sufficiency, each settlement to have its own windfarm. We want assistance and direction from the Scottish Government to own wind farms.
- Complete and connect a national cycle path network.
- Food waste - specifically the mega waste that happens inside people's kitchens is a huge contributor to carbon emissions. (Participant specified: not referring to how the said waste is dealt with during disposal by the local authority.) The need is to motivate people as individuals to reduce their own

food waste. Not a spatial planning issue per se but should be embedded across all Scottish policy.

Resilient Communities & Sense of Belonging:

- Communities have been receiving funding for “sense of pride” projects, eg in a small town (population c 23k) in West Lothian identifying important buildings and explaining their significance; a publication about the town’s history – recognise/value your place.
- 20-minute neighbourhood: revival of high street, shopping locally where possible. In a large city local authority - District Regeneration Network to join up the neighbourhood. There are missing connections between North/South, West/East. What kind of connectivity does the community want/need? A large city local authority is divided between Planning and ALEOs (Arm’s Length External Organisations) organising city property. The rules between the two organisations are different. In one instance, the ALEO contested the views of the community council.
- Community council set up a memory garden (where local people could record positive memories of living in the area), recently a new arrival in the area has really appreciated it as a wee welcome and positive.
- As a country, we need to have a better relationship with pride. We should take lead on climate change.
- Making a community means including all, no matter the social/economic background. Students have zero relationship to the area.
- Citizens having to put in their time and effort to contest the developers’ proposals but with very little impact.
- New developments are very bad for creating any sense of belonging, no services, no provisions, that needs to be scrutinised.
- We need to find ways in which short-term tenants, long-term tenants and students have a new and valued engaged role in communities as at the moment the permanent population tends to feel it’s all down to them.
- There is a huge push to build more social housing. This target often overrides local community opinion. Objections can only be raised that are linked to material issues of planning regulations. This reduces the voice of the local community who may have concerns outwith these material issues.
- Small villages in a local authority characterised by small towns, villages and rural areas, have been expanding into the green belts, many of these new builds are ending up as second homes and being used as businesses. These have been let out throughout the lockdowns and have caused many problems for locals using the small shops where only one person is allowed in. They do not put much into our communities but take a lot out of them.

Better and Greener Places:

- Green spaces in centres should not be privatised. On the other hand, when they are, their biodiversity is higher. What is better and greener is not always inclusive for humans.
- Better protection for mature trees in green space – public and private land.
- Flood management (both coastal and surface water) needs to be further prioritised as it has economic impact and is a wellbeing issue, and policy statement says a lot but no specific micro-policies/delivery.
- Scottish housing policy does not protect the greenbelt. It is constantly attacked by developers. Local authorities are not strong enough to protect it. Greenbelt delivers immediate health and wellbeing benefits. Greenbelt needs to be conserved for wildlife, biodiversity, and nature.
- Windfarms have to be limited; green space should be prioritised before electricity. Often it is applications going straight to Scottish Government and sometimes they cannot be seen by the public.
- Protecting the environment should be national priority ... without that we have nothing, no tourism, no biodiversity, no food.
- Places need to be protected from fly-tipping; volunteers are cleaning the place up. Education is key to this but also provide more bins in countryside.
- Planning should insist on brown sites before green sites.
- Better health and wellbeing. Opening up greenspace to all generations. More footpaths, rights of way, cycle routes, outdoor activities. Pocket parks in cities.
- We need to protect our lovely beaches.

Wellbeing Economy

- Employment is the key. Giving somebody a job - that empowers them. It gives them means to achieve better life.
- Place Standard works really well for health, but links need to be made between policy and health - not just economy but also wider aims.
- If you get mental and physical health right, the economic will follow. If people are happy outside of work, they will be happy in the workplace.
- Sense of national pride about Scotland; going abroad and selling Scotland. If there is pride on national level, it portrays to local level. Tourism helps this country massively; the tourist board needs to be more proactive. Scottish people doubt them so much.

One Big Idea for NPF4

- NPF4 must build on what communities say, it must protect greenbelt and green areas from developers.
- Value of our culture and heritage needs recognition, not to forget the Gaelic language.
- Practice the principle of subsidiarity (as popular in EU) - empowering local communities. Finding the right level for decision-making.

- Objectives in the NPF4 that would encourage direct engagement with policy makers.
- Legislation to stop large housebuilders, supermarket chains, windfarms from land-banking.
- Self-sufficiency for every community. Communities should have a warden to report broken services (infrastructure etc).
- Finance community councils on a bigger level. They should not be paid as they operate on a voluntary basis ... but provide funding for specific projects.
- Limit international buyers who live away but own properties in town centres and leave them neglected. Properties should be sold to the communities.
- We need to strengthen pre-application consultation requirements so that developers have to:(1) demonstrate a representative consultation about their initial plans (2) how they have changed their plans in line with the feedback unless there is a clear point that it is not material. Too much lip service paid in regard to pre-application consultation currently.
- The solution to the housing crisis is perhaps not just to allow developers to build more and more pokey wee flats with inadequate greenspace, community facilities, health provision and education provision.
- Encourage idea that development is not necessarily to be equated with buildings.
- Having made responses to both Housing Policy Technical Amendments and NPF4, unconvinced NPF4 will deliver the changes required for communities. The Scottish Government needs to take back power for the sake of its communities. It has a duty of care and it has and is still failing us.
- No major development should be allowed before the local community has had the opportunity to create a local place plan. The developer should then have to respond to it.
- Maybe produce case studies showing how NPF4 might identify a rural community, medium size town community, urban community etc. Once it's better known, long term future engagements will become more meaningful and accessible.
- Everything is getting too big ... get back to smaller units be it town's businesses or whatever. Local authorities have grown with too many chiefs and not enough people who can go out there and do the work, ... the costs for their upkeep could go a long way to road repairs etc.

10. Report of Event 3

Net Zero Emissions:

- A large city local authority has a privatised bus service which is not right, in another large city local authority, public buses run by the local authority appear to be used more as well. Bus authorities may need to invest in order to make bus journey accessible and attractive to all, possibly not making profits on all routes initially. The evidence suggests it is still difficult for people to use buses.
- Public transport should use data/smart/apps to see where people are.
- Green spaces need to be accessible in towns, otherwise people will still drive to nature elsewhere.
- Improve charging points infrastructure for electric vehicles.
- Dormitory towns often do not provide any workplaces; therefore people have to commute. Work should be moved into local area to prevent commute needed.
- Housebuilders should have to build solar panels and charging points in them as well as good broadband connectivity.
- Electricity power cuts on the island mean electricity is generated from diesel. Ferries from Shetland to Aberdeen use oil but there should be other options.
- Balance between rail travel & air travel ... we have far too much internal air travel, rail needs investment. Reduction in number of airports – take out the big contributors of pollution.
- High council tax in remote areas mean the local authority is building further into the green areas, not considering access. Walking is not feasible as there are no pavements.
- District heating systems need to be explored – boilers are not replaced in tenements. Hydrogen is explored yet is not implemented. Efficiency of buildings to improve.
- Transport: current provision is unaffordable, and the lines do not serve the outlying areas very well.

Resilient Communities:

- A lot of people currently dying from sedentary lifestyles. The way places are designed, and the spatial network needs to provide more green spaces to encourage people to move.
- 20 minute neighbourhood needs to take account of people with mobility problems or partially sighted. Commuting is a problem; there should be establishment of parking places for transport of the Light Goods Vehicles and Park & Ride. Consider provision of Light Goods Vehicles as electric vehicles.
- 20 minute neighbourhood. Example of neighbourhood which recently lost post office and a food shop. Food shop was not used enough by local people – often preference to commute to bigger supermarket.

- If you want to provide sense of belonging, you have to provide a reason to stay. People suffer from building on greenfield sites and there is no provision of housing for elderly or single people. Young people cannot get housing elsewhere close as the new provision of housing is mainly family homes.
- In order to attract new businesses, there should be encouragement to people living closer to the shops/above the shops and in town centres.
- Sense of belonging and sense of pride – a lot of the things that would cause this are not done; rubbish collection, littering. Keep doing the things we do already but do them better – like the rubbish collection and prevent littering. This can come down to local democracy and blaming the bigger local authorities, but actually what are the community councils' responsibilities? Resilient communities could be delivered by community councils.
- Inspiration from the Swedish model where social housing have tenants' associations and you have to join it if you want the housing and you take care of your environment and community.
- Resilient communities: infrastructure of the community needs to be delivered before any new housing. Parking, dentist, doctors, schools.
- There are long delays for appointments for psychiatric and mental health care appointments in rural areas –encourage more people to enter these professions.
- Need housing for young people to stand on their own feet. Could be social housing where they would earn points (credit) for keeping it nice and would help them in future.
- Planning permission in principle is risky because it barely covers the details of large-scale development.

Better, Greener Places

- Stop land-banking ... large companies buying green and leaving it derelict waiting for the value to increase. It leads to dumping and just empty land in town centres. The owners should be given two warnings and then the local authority should claim it back. The law has to be stricter.
- Land banking might not be purposeful but ends up appearing so because of the planning system being slow and decision-makers not deciding.
- Cutbacks of street services leading to people having to volunteer. This leads to people feel much more ownership and responsibility of the area. However, volunteers can only do so much – green areas need protection as during the pandemic they are popular for visitors, pathways are eroded, and professional maintenance is needed.
- Planning process often stops people from having access to green spaces because developers get out of committing expenditure to places which make it possible for communities to meet and get together. There is too much of a dormitory situation – no community centres. This seems to happen more in rural communities. If planning departments have enforcement available, they are not using it properly.

- Vacant land in smaller areas can be used for community purposes.
- The question about strengthening places should include heritage.
- Often there is push for something in rural areas that will bring jobs and tourism into the area; reality are “only three jobs” and so much tourism the roads and infrastructure cannot cope.
- The Position Statement does not state clearly how to attract people into rural areas - as it states as an aim at the chapter on Better Greener Places.
- Supplementary planning guidelines should incorporate green corridors.
- Open space strategies should not include cemeteries. It does get the figures up, but nobody wants to use that as open space to play or exercise at.
- Developers don't want to build on unattractive land. But they should be not allowed to resubmit an application for exactly the same piece of land/development after being rejected and the local community not being consulted.
- Beaches need protection too, including provision of bins, benches, toilets.

Plan for Wellbeing Economy

- Croft land is not aimed for social housing.
- There are concerns the government undermines the meaning of the wellbeing economy and will still give main focus on GDP.
- Local authorities should be using local companies as suppliers – not from abroad. Building and supporting local business rather than international monopolists.
- We need to promote soft planning – how can we improve local economy? As retail is now gone, we can re-use the buildings that are existing already. People are paying for experiences other than retail so we need to re-think how we want the visitors to spend their money.
- Wellbeing will not be delivered if infrastructure is not improved. Broadband is as basic today just as bin collection. People cannot enjoy nature if there is so much litter on the commute.

One Big Idea for NPF4

- Need for legislation on second homes and Airbnbs. Review a case study of Åland Islands (Finland) where there is need for citizenship in the area.
- Bus services need to enable bike transport and have proper interchange stations.
- If there is expectation that tourism is crucial for the rural Scotland, then the infrastructure has to be put in place quickly.
- There is a strong disconnect between community councils and local authorities – this should change.
- The Position Statement does not present any national developments. This should not be skipped at this stage and only presented to the parliament when it's too late to consult on.

- Fuel and transport poverty lead to inequalities and affect islands disproportionately.
- Free public transport.
- Community councils would like to see methodology for housing supply/demand calculation rather than just an advice note.

11. Report of Event 4

Net Zero Emissions:

- We should be clear that we are accounting for the carbon dioxide impact of construction. The bow wave of emissions in the construction phase must be measured. We need to take account of this at planning application stage.
- Housing which is being built now should meet net zero emission standards and building regulations should require this. Examples of housing built to PassivHaus standards in some areas were noted.
- Brownfield sites should be used before greenfield sites but we should not assume that brownfield sites are always the answer. These sites have been shown to have greater environmental value than some greenfield areas.
- In rural areas reaching the net zero emission target can't be separated from how public transport is provided. The fragmented public transport system, in which nothing seems to be linked, and the current business model for its operation works against net zero emissions.
- We need education to support the move towards net zero emissions and we can only change lifestyles and habits if people can afford it. Education and access to capital are barriers to the changes in lifestyle which are needed to achieve net zero.
- There are big differences between public transport in urban and rural areas but it presents some of the most significant issues in both. In one of the most densely populated and deprived areas of our biggest city our main service bus is a single decker! Also get the older and most polluting buses on our routes. Bus services are too expensive, infrequent and not integrated but it is recognised that the local authority doesn't have funds to influence on bus services and trains are out of their hands.
- Smarter community transport systems are needed if we're going to move to net zero. The Dial-a-Bus scheme, for example, must be more efficient than running empty buses on scheduled routes.
- The main issue is the fuels which are used in transport. There's a lot of research into the use of electric or hydrogen fuelled trains.
- Creating walking and cycling routes in communities is very valuable but they must be connected and link with transport hubs. New paths and cycle routes need to be joined up so that they are useful.
- Simple pavements and path upgrades are needed in some areas, but the local authorities have no money. The active travel concept is not applicable and restricts the simple solution.
- In some areas, ground water and energy from waste systems have the potential as sources of heating. Creating more efficient, more sustainable systems in new developments can, however, lead to a divide between these and those parts of communities which rely on gas boilers which are not going to be upgraded.

- The Position Statement's emphasis on moving to net zero emissions and addressing the climate emergency is very welcome but the statement is weak in its support of action to address biodiversity loss, the biodiversity emergency.
- The Climate Emergency Declarations which are being adopted by some local authorities need to have teeth and, possibly, the power to over-rule planning decisions.
- Applications must change. We had a 444 chalet park application on which there was not a single public transport element, not a single electric vehicle charging point and no alternative bicycle access.
- When will developers be only granted permission to build houses if they also commit to providing the infrastructure to support the development? Developer currently looking to build on land near us, but there is no evidence of any need for the facilities/retail/housing/etc that is being proposed. It is all profit driven, and no consideration of communities and their needs, or of climate change and unintended consequences of what is being proposed.

Resilient Communities

- How will the concept of the 20 minute neighbourhood be rolled out in practice? More thought must be given to what it means in rural areas.
- To support the development of 20 minute neighbourhoods, people need to have employment locally. Can we allow more people to work from home, perhaps as an employment right? Could community halls double to provide some local employment services? Often, everything else except your job can be achieved locally.
- There is a lot of emphasis on places but a community is only a community when it has all of its essential needs including jobs.
- The concepts of 20 minute neighbourhoods, resilient communities and moving to net zero emissions are understood but some communities are losing services, such as GP services. We think about building housing, but we need to build the services which are needed at the same time. The new Planning Act doesn't put enough pressure on developers to deliver infrastructure. It is too easy for developers to walk away, without providing the infrastructure.
- In some urban communities, the increase of houses in multiple occupancy is changing the demographics and the sense of community is being lost. Current legislation should be enforced, and the expansion of HMO controlled.
- As small communities expand with new housing built on greenfield land which previously separated them from other settlements, communities are losing their identity.
- Communities need to feel that they have influence on the future of their areas if they are to maintain a sense of belonging. The Position Statement makes references to communities being influential, but they need to be listened to. Communities must be at the heart of the decision-making, not an afterthought.

- Communities must be engaged more thoroughly in local development plans and development plans must set a defined route for sustainable development in and of a community. Developers must be prevented from then cherry picking sites not in the development plan, such applications should be rejected.
- Community councils should have more power and influence in decision making as they know the community far better than anyone else and understand local needs. At present, commerce and profit trumps community every time.
- Local councillors are limited in what they can influence at local level at the application stage. There is a need for national governments to take on the vested interests of major developers.
- Getting out of doors, for example in walking networks and community gardens brings communities together and contributes to a sense of ownership and belonging. However, the landscaping and related schemes promised in new developments are often unimplemented. Local authorities need to have powers and act robustly to secure the delivery of these types of works.
- There is too much emphasis on developing tourism. Increasing tourism brings risks to a community. We should risk assess tourism developments to avoid damaging existing communities.
- The role of history and heritage in creating places and a sense of belonging should be more recognised. It can be generational and be about valuing the local knowledge of residents, but it is frequently ignored/dismissed/given lip service by officers in local authority meetings.
- The planning system seems to work backwards, starting with landowners and developers promoting sites, but we should start by identifying what's needed.
- In a large rural local authority, there are small towns with themed locations, Artists' Town, Book Town, Food Town etc. The same could be applied to small villages, but local authority must acknowledge the identity to create places, and not side-line the subject.

Better, Greener Places

- There should be more emphasis on re-using buildings and ensuring full occupancy of existing buildings, for example by making full use of existing offices rather than building new ones. We should look at how business rates could work to encourage these changes.
- The requirements for environmental assessment relating to the loss of ancient woodland are too loose. The provisions in the Forestry Act requiring the replacement of ancient woodland and planning provisions for the protection of trees in conservation areas should be implemented more consistently.
- Are local authorities monitoring trees and green space and are they able to report on changes in the biodiversity in their areas? This should be done through a public register. It was noted that one small mainly rural local authority has a map of protected trees and conservation areas on its website.

- A community council identifying an area which ticks all the boxes for the creation of a pocket park may find that the Community Empowerment Act is not helpful.
- We need to have mechanisms to prevent developments on areas of great environmental sensitivity. It should not be possible for reporters to override environmental constraints.
- Need to make better use of land and enhance biodiversity, so need to make changes so that building on green spaces is not the preferred or easy option.
- It would be positive if jobs arising from new developments could be prioritised to people living in the area.
- We should recognise the value of blue spaces as well as green spaces. River basin management plans are needed to ensure the value of the rivers running through communities.
- Slowing down traffic can improve the quality of life in communities. Communities should have a greater influence over the regulations relating to speed limits in their area. 20mph zones were welcome in some communities but others noted that such zones may remove local authority requirements for road safety and improvements.
- Finding out about land ownership from local authorities can be difficult but local people know their areas. Planning committees are prohibited from discussion of land ownership. When you try to speak about it you get silenced by the chair or governance officer.

Wellbeing Economy

- It isn't clear what a well-being economy is. It is asking too much of the planning system to deliver the well-being economy. The planning system, community councils and local authorities have very limited powers locally. Scotland and the UK are highly centralised. Separately, it was noted that a community council, the local authority and a national public service can object to or refuse a proposal, but it can be approved at appeal.
- Given that NPF4 is supposed to influence planning until 2050, why not consider emerging economic theory, such as Doughnut Economics, already in use in Holland?
- Start with Universal Basic Income. Read Our Money by Malcolm Henry, who has thought about this from an island perspective for many years.
- An economy needs wealth creators. Who is going to pay? It cannot be assumed that all developers are making much money and it can be argued that requiring developers to pay for a new school is, in effect, a tax on new homeowners. In addition, we are entering a period when there will be less funding available in both the public and the private sector.
- The licencing of hospitality businesses should require that they make use of local produce rather than transporting supplies from across the UK.
- It would be useful to have something in NPF4 to stimulate local developments and facilitate local job creation.

- If a larger development takes up the available capacity of infrastructure such as a sewage works this can then become a constraint on smaller developments within a community.
- The uncertainty around the roll out of broadband services is unhelpful to potential investors.
- Community councils and developers should be encouraged to work in partnership to deliver community benefits irrespective of a community council's initial position on a proposal, including when it objected to a development which is later approved at appeal.
- Wellbeing isn't always about jobs or money, as demonstrated in responses to pandemic last year when talents were more important and barter systems emerged. The opposite of well-being could be defined as "dis-ease". Scotland needs to be more at ease with itself.

One Big Idea for NPF4

- Scottish Planning Policy includes grey areas requiring subjective judgement. Is SPP or NPF4 to be the superior policy?
- Would like to see a Citizens Assembly work on this. This would avoid it disappearing into quangos.
- I think we need stronger outline planning permissions. The system has focused on ever finer detailed requirements as if these were matters of principle but that militates against setting principles effectively.
- Organic development maintains communities but planners get more from working with larger developers. Planners have less time to build relationships with communities.
- Planners should be accountable. We could not even get them to come to our meetings. They should have to come to community council meetings.
- Given there is no 3rd party right of appeal, we need a security-style clause (like Magna Carta article 61) to reverse applications that are damaging to the environment.
- Third Party Right to Appeal to be included as part of the system.
- Little mention is made of the aesthetic appearance of developments.
- If a proposal is rejected following the completion of the planning process, following any appeals or reviews, there should be a moratorium on repeated applications with minor amendments on the same site.
- Please listen widely - do not just hear the inputs of community councillors.

12. Report of Event 5

Net Zero Emissions:

- Stopping cars parked outside schools would be easy to implement.
- Local authorities should be pressing developers to provide an energy balance sheet for developments and to identify how much of the energy used will be renewable energy.
- NPF should focus on and deal with strategic matters. It should not muddy matters by also dealing with local issues. Reducing the need for travel has a role, for example by promoting attractive local areas such as recreational areas or country parks.
- We need infrastructure to facilitate home working, including rural broadband but we also need local hubs for sharing connections to enable remote working.
- There needs to be improved connectivity of buses and more emphasis on promoting bus usage in both rural and urban areas. Cycling and walking will not be an option for everyone, even in smaller towns, and buses used should be accessible to all.
- There is a lack of connectivity between communities within urban areas. This is especially important when, in many areas, facilities such as banks and shops, other than takeaways, are closing and there's a lack of community spaces. For example, there are now no banks in the north east of a large city local authority area. There ought to be a requirement for basic community amenities to serve communities within 20 minutes.
- Developers use current regulations but will the onus on changing systems within buildings be on the owners? We know now that the regulations and requirements will be changing.
- People do not yet have the mind-set to move to net zero. This needs political leadership.
- The street user hierarchy set out in Designing Streets in 2010 is useful but housing is still being built which does not adhere to these principles.
- School travel plans in some areas have not been progressed and implemented. This is not a criticism of the schools themselves.
- Active travel infrastructure for safe cycle and other wheeled use, rather than leisure use, has not been promoted and the infrastructure provided. It is not always clear who is responsible for implementing active travel strategies. Local infrastructure such as crossings and cycle racks, for example, have not been implemented.
- What is meant by community? A 20 minute neighbourhood is all very well in a city of villages but less meaningful in a large town.
- We are not going to stop car/vehicle travel. We need to strengthen renewable electricity generation, larger scale storage, distribution, local storage and charging for a greater number of electric vehicles. This needs national level leadership and multi-partisan support.

- We need charging points for mobility vehicles, not just electric cars, in developments.
- Well-connected public transport infrastructure making travel to shop, work etc. easy is still not in place. In London many people have abandoned car ownership as Transport for London works so well.
- We support renewable energy, but the creation of wind farms shouldn't mean destroying natural peatlands. There is poor consultation with the communities affected and, despite challenges to the Scottish Government and Forestry and Land Scotland, schemes go ahead.
- To make rural public transport more attractive, communities should have a role in deciding routes and timetables. Unprofitable but needed routes should be bundled with the main, obvious routes for transport operators to run. Connectivity to other public transport routes and services should be coordinated.
- There's a lot written regarding infrastructure-first - but who pays to put this in first?

Resilient Communities

- Community councils in some areas have been picking up the gaps in local authority ideas and leading support for the community at large. It can be difficult to get local authorities to engage and support the community.
- Some community councils, or groups of community councils, have developed their own resilience plans but there's a disconnect between local authorities and communities. Community councils need to be treated more fairly by local authority and with more consideration. Our aims should be the same.
- We need to see more effort to create multi-generational development. The pandemic has shown the benefits on multi-generational communities. Almost all new developments seem designed to separate generations. Developers segment the market for profit, for example building small, tightly spaced family housing in suburbs or small flats for single people or downsizers with no recreational space in inner urban areas. Planners are not facilitating a mixing of generations.
- The growth of build to rent in some areas is disproportionate as this type of housing is not appropriate for many people.
- There is no strategy noted on the improvement of home quality. We have the smallest rooms in Europe. Covid showed up the difficulty of tiny living spaces.
- We need to develop more adaptable homes for lifetime living.
- 20 minute communities concept is interesting, but it doesn't work in small rural communities.
- What do we mean by a sense of belonging? How do we discover what people want? Community councils are not very representative and local authorities don't want to give them powers. Unless community councils have powers, are representative, and are given time to work out what people want, they almost

become talking shops. Communities must be actively involved, working with professionals.

Better, Greener Places

- Covid has shown the importance of accessible, local greenspace but, in some areas, people have to walk or travel long distances out of their neighbourhood to access greenspace.
- Local place plans offer a great opportunity to recognise the value of greenspace in an area. Planning relies on a direct link between the natural and built environment. From NPF4 to LPPs we must understand the value of existing greenspace and protect what we have. We have the tools but we're not using them properly. NPF4 should start with the strategic areas and be looking for a stronger link to the local scene.
- Greenspace and community gardens should be promoted more. There is pressure for more growing areas, gardens, community gardens and allotments and for greater direct individual and community involvement, including schools' involvement in these. The experience of a newly created park in a large city local authority offers some lessons on reaching out to and involving local people.
- Consents for wind farms and mineral extraction are eroding some important, designated rural areas, for example in a large rural local authority Forest Park. The indication in NPF4 that it will have a stronger influence on local planning decisions is concerning. Local authorities know what is best for their areas and their decisions should not be overturned.
- The past year has shown that people feel intense delight in local parks and greenspace and these areas bring people together. Friends groups' involvement is welcome but park services have lost many staff and are not resourced to manage and maintain greenspaces to deliver the value which they could.
- New developments are always developer led rather than planning policy led. Local housing targets are going to lead to the loss of greenspace. Developers shoehorn in developments, often not looking at the connectivity of green space.
- Decisions taken locally by locally appointed councillors should hold sway. There has been an increase in decisions being overturned by reporters. We should reduce the reporters' discretionary powers.
- Stricter enforcement needs to be carried out by local authorities (with less discretion for the authority). The erosion of greenspace in masterplans should also be resisted.
- The practice of developers taking a punt on a green space should be eliminated. They apply for planning permission continually and need to win once but communities need to win every time. The ideal would be stricter restrictions on use of green spaces as windfall sites.

- Even when funds are secured from a developer to help create a greenspace, for example for allotments associated with a development which was objected to by the community, these funds are gathered by the local authority and do not always benefit the community involved.
- High level plans promote tourism without checking whether there is capacity to take visitors, for example accommodation, bins, car parks. Marketing ideas are often anti-community and anti-planning. Locals are suffering the fallout while others take the benefits.
- Applications to replace front gardens with barren blockwork should be refused.
- We need to ensure wildlife corridors and wooded shelter belts are included in all new housing.
- Encouraging people to have a stake in the future use of derelict land for their benefit should be priority, rather than land-banking by the land owners. We need mechanisms to make sure owners use it or lose it within an acceptable timeframe.
- If schools engage with nature in the community, that can give kids a sense of ownership and this makes them less likely to destroy it. Strengthening and ensuring compliance with dog fouling laws would encourage people to walk with kids rather than use their car and reduce car use through the generations.

Wellbeing Economy

- Wellbeing is about personal wellbeing and a sense of worth. It is not helpful that things have become so fragmented, that there are so many platforms that individuals, groups, organisations or companies have to deal with. People have to understand how and where they can engage.
- What is a wellbeing economy? How are we going to recognise it?
- A wellbeing economy is about the wellbeing of the community. We need to think about what the community needs to sustain it, for example are there diverse shops and fresh produce available within area and are there banking services in the area?
- The pandemic has highlighted so much that we need to consider in the framework. We should welcome tourists but we need sustainable tourism. Planning, licencing and regulation, for example related to short-term lets, is not being enforced. Wellbeing is a holistic phrase and we don't have a holistic approach.
- The new registration scheme for short term lets is not required across the board. Small rural communities with only a few rentals should not be classed in the same way as city centres where registration would be of benefit.
- The concept is that communities develop own capacity to handle development, are empowered to ensure development fits with their requirements as well as wider objectives and have some element of local

control. The North Coast 500 is an example of a successful development but communities on this route are under pressure and do not have control.

- In rural areas, we see a lack of capacity in infrastructure, for example camp sites in Argyll. Route 66 is about to be launched but there is no infrastructure.
- The NPF4 Position Statement and other government initiatives make many references to community engagement and involvement, ownership and resilience but there is little consideration of the capacity of communities to do this. There is no reference to community councils in the Position Statement. The government's intentions are well-meaning and there is talk of tools and support and examples of good practice but, on the ground, how do we build capacity in communities?
- The lack of capacity is a key point. We are seeing many projects where local authorities want to hand over responsibility to communities but they lack the capacity or core funding, training etc to produce viable business plans.
- Accountability - COSLA's response to the framework agreement on participatory budgeting shows the extent to which local authorities are a block on community engagement and want to do it on their terms. To an extent, this is understandable as local authorities themselves have been hollowed out but there are issues of accountability both upwards and downwards.

One Big Idea for NPF4

- An organogram of the hierarchy of governance with associated funding at each level would be very useful. This could also help explain how community councils engage in the process. It is concerning that there are many Acts and strategies (silos?) involved in implementing what is in NPF4 and understanding the relationships and governance is a challenge.
- NPF4 should recommend that local authorities' planning decisions should not be overturned.
- Community councils would benefit from more familiarisation or education in NPF delivery using interactive sessions, not just convoluted mail outs or posts online.
- One big idea - make community councils the third tier of government as the fulcrum for mobilising community engagement, with proper resourcing, powers and capacity.
- One big idea - more power to the local authority and communities.
- Need more availability of grants to swap to green vehicles.
- Involve community councils in pre-planning discussions between planners and developers.
- One big idea - listen to the needs and desires of the local community and not what meets the political desires of the local authority. Take account of local feelings for development.
- Community plans/local place plans sound great but who is going to assist with funding/resources/time to be able to produce such a document? And do the

necessary skills exist within local communities to formulate and co-ordinate plans?

- There should be a liaison officer within the local authority who gets answers to questions to save community council members from feeling ignored.
- Review when EIAs are required. The current protocols are far too limited.
- Compel owners of derelict land into action or they should lose the land through stronger CPO/more community-focused CSO (compulsory sales orders). Rather than put land on market, it could be offered to community organisations through their planning proposals.
- Promote the re-use of derelict buildings which are privately owned through some form of compulsory purchase.
- Once a development has been refused, there should be limited grounds for re-applying. Developers grind local people down by constantly re-applying for an unsuitable proposal.
- At what level will section 75 agreements be made?
- How does NPF4 align with the LDP2 consultation process? How can it be integrated into the LDP?
- B&B owners have not had sufficient government support through the pandemic.

Appendix 1: Event plan

Welcome & context setting

1230 Welcome | Introductions | Group Guidelines | Project background | Objectives

1235 Introduction to PAS

1240 Introduction to NPF4 and Position Statement; how to respond; effective responses

Discussion section

1250 Theme 1: Net Zero Emissions

1305 Theme 2: Resilient Communities

1320 Theme 3: Better, Greener Places

1335 Theme 4: A Wellbeing Economy

1350 "One Big Thought for NPF4"

1355 Thanks

1400 Close

Appendix 2: Visual resources for events

NPF4 Position Statement: Discussion Workshops

Petra Biberbach
Lenka Svorcova
David Wood

www.pas.org.uk
@PAS_Tweets
#ScotPlan2050



Today...

- Event will be recorded
- Please introduce yourself as you speak - use raised hand icon, the chat, or just ask direct
- Please keep microphones muted when not speaking
- Please respect everyone's views
- Audio or other issues: try leaving & re-joining



Objectives

- Introduction to National Planning Framework 4
- Offering everyone a chance to speak
- Hearing your views/opinions/ideas*
- Discussion/Q&A

*A report of key findings (non-attributed) from the event series will be prepared by PAS for the Scottish Government



PAS

We help people shape the future of their places & communities through open & inclusive engagement with planning & placemaking

- ✓ Impartial
- ✓ Independent
- ✓ Educational Charity
- ✓ Social Enterprise
- ✓ Volunteer-led
- Planning Advice
- Training
- Local Place Plans
- Seldom Heard Groups
- Policy

Our volunteers, including planners & other built environment professionals, offer their time to help people with planning & placemaking

www.pas.org.uk



Our Values

We act with integrity: We deliver our work with honesty, trust, fairness and realism for everyone.

We are inclusive: We seek to reflect continually on our practice to provide opportunities which open placemaking to all.

We are collaborative: We establish cohesive and inclusive partnerships that make the most of everyone's knowledge and experience.

We are impartial: We enable people to engage proactively in the planning system and placemaking, but do not express opinions on individual plans or proposals.

We promote participation: As an educational organisation, we facilitate people to be involved in shaping the future of their places, and celebrate volunteering, learning and active citizenship.



NPF4 Position Statement: (Nov 2020) Key Themes



“The long term strategy will be driven by the overarching aim of addressing climate change”

National Planning Framework 4

The 2006 Planning Act set a requirement for “a spatial plan for Scotland” to be prepared

The 2019 Act radically changes the status of the NPF

NPF4 will:

- indicate targets for use of land for housing by area
- set core national planning policies & incorporate current “Scottish Planning Policy”
- be part of your Local Development Plan
- have stronger influence on Local Authority planning decisions
- receive greater parliamentary scrutiny

Local Place Plans will also be new level of plan prepared by communities

NPF4 will still contain “National Developments” for Scotland

Net Zero Emissions

- plan to reduce emissions
- plan to reduce need to travel
- promote energy efficient buildings
- integrate land use/transport
- nature-based solutions
- renewables

A Wellbeing Economy

- support green economic recovery
- reduce inequality & improve health... not just economic growth
- support development where most needed
- support sustainable tourism
- improve digital connectivity
- transition to a Circular Economy

Resilient Communities

- 20-Minute neighbourhoods
- local area adaptation for resilience
- good quality/right type of homes
- infra-structure first approach
- public health based approach
- inclusion & equalities approach
- more sustainable travel

Better Greener Places

- re-imagine town/city centres
- higher quality design
- placemaking approach
- vacant & Derelict land/buildings
- promote rural/island living
- coastline adaptation for climate change
- protect natural & built assets



NPF4: Next Steps

Jan-Apr 2020	Call for Ideas consultation
19 Feb 2021	Position Statement – deadline for comment
--	Analysis of Responses
Autumn 2021	Draft NPF4 laid before Parliament + extensive consultation
Spring 2022 *	Adoption (*expected)

How to respond – visit:

<https://consult.gov.scot/planning-architecture/national-planning-framework-position-statement/>

Give us your views

[Begin consultation >](#)

More information on NPF4: www.transformingplanning.scot



Discussion prompts:

A Plan for Net Zero Emissions

How should our living and travelling habits change to achieve Net 0?



A Plan for Resilient Communities

Where and how might create places with a sense of belonging?



If you can't make the 19 February deadline, you can still email your thoughts to scotplan@gov.uk. This will definitely be taken into account but may not be written the analysis report.

Sharing your thoughts with us

We would welcome any thoughts on this position statement. We appreciate that stakeholders may not have much capacity to do so in the current climate, particularly if they have already shared ideas with us, and may prefer to reserve further input for the fuller consultation draft in autumn 2021. There will be no need to restate points made through the Call for Ideas process – we continue to use that evidence source as we take forward our policy development. We will continue to update our Programme for Engagement as work progresses towards a draft NPF4, ensuring opportunities for all to be involved.

If you would like to comment now, we have set out these questions which will help to sense check the position statement.

1. Do you agree with our current thinking on planning for net-zero emissions?
2. Do you agree with our current thinking on planning for resilient communities?
3. Do you agree with our current thinking on planning for a wellbeing economy?
4. Do you agree with our current thinking on planning for better, greener places?
5. Do you have further suggestions on how we can deliver our strategy?
6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?
7. Do you have any other comments on the content of the Position Statement?

From NPF4 Position Statement



A Plan for Better Greener Places

How do we improve, protect and strengthen the places we live, work and spend our leisure time in?



A Plan for a Well-being Economy

How can Scotland achieve a well-being economy?



Your one big idea for NPF4?



Thank you

Get in touch – just drop us an email:

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david@pas.org.uk

www.pas.org.uk

