

# Response ID ANON-MBC2-PQPT-9

Submitted to **National Planning Framework: Position Statement**

Submitted on **2021-02-19 11:53:19**

## Questions

### 1 Do you agree with our current thinking on planning for net-zero emissions?

**Please give us your views:**

WIND FARMS

We note the proposal on p10 to strengthen support for re-powering and extending existing wind farms. However, the increasing size of proposed turbines and resultant amended layouts mean that re-powered wind farms are effectively new developments, often with significantly greater landscape and visual impacts than before. This will require revision of NatureScot's guidance on siting and designing wind farms in the landscape. The environmental impacts of re-powered or extended wind farms should be assessed against the characteristics of the pre-development site rather than against the existing development. There will also continue to be pressure for wind farms on new sites. For all of these reasons it is becoming ever more important for the Scottish Government to prepare an overall national locational plan for onshore wind farm development.

NATIONAL PARKS AND NATIONAL SCENIC AREAS

We welcome the proposed continued protection of National Parks and National Scenic Areas from onshore wind referred to on p10. However, this protection should be extended to Wild Land Areas.

### 2 Do you agree with our current thinking on planning for resilient communities?

**Please give us your views:**

COMMUNITY ENGAGEMENT

The Position Statement makes much welcome reference to place-based development and to local community input to local solutions. Given that the Scottish Government (SG) is committed to a plan-led system but has not seen fit to introduce even a limited community right of appeal, NPF4 needs to make clear precisely how local people will be enabled to engage meaningfully with Local Development Plans (LDPs), masterplans and planning applications. It must also explain how the implementation of approved developments, including any planning conditions, will be monitored and how any failings to fulfil these will be held accountable.

The goal of '20-minute neighbourhoods' is welcomed and should acquire impetus from the shift towards working from home. This should reduce transport emissions and benefit air quality, local economies and well-being. However, the Position Statement fails to define what these actually are, and the following sentence is particularly impenetrable: "The 20 minute neighbourhood concept doesn't exist in isolation but scales up to include larger geographies and networked areas providing access and opportunities for the wide range of facilities and services that communities require." Supporting the availability of local services will be key to success. NPF4 must therefore discourage out-of-town retail parks and large isolated residential developments, which both depend on private car use, and the SG should remove the negative incentives that have promoted them, as highlighted in 'A New Future for Scotland's Town Centres' (February 2021).

Local Place Plans (LPPs) could be one of the foundations for better community engagement, but to achieve this NPF4 must give LPPs formal policy status in both development planning and management, and must require developers to respond to the ambitions expressed in them. The SG must provide greater resources for communities to develop LPPs and must ensure that planning authorities consider LPPs meaningfully give them appropriate weight within in the planning process.

HOUSING

We welcome the move away from maintaining a five-year supply of effective housing land, the increasing support for regeneration of brownfield land and empty buildings and the adoption of a circular economy approach to construction. We note the recognition of the problems with Housing Land Audits and setting delivery targets, and hope that a fairer system can be devised in which unreliable assumptions or manipulated figures are not given undue weight.

We note the recent changes to Scottish Planning Policy (December 2020) following the technical consultation on housing policy during 2020, and look forward to NPF4 providing further clarification on this issue. It may be, despite the recent changes and given the environmental and well-being crises and the ten-year timescale of new plans, that there is a need to develop a mechanism that when a housing land shortfall arises allows local authorities to bring forward the 'next best option' in terms of housing land (ie one that best meets net-zero and other targets as well as housing). This could avoid the worst aspects of speculative development proposals that fit less well with local authorities' climate, infrastructure, environmental and well-being strategies and therefore have long-lasting detrimental consequences for the community and the environment. This would require a mechanism to allow the planning authority and local community to work together (with input from potential developers) to identify the most appropriate sites to meet any shortfall in a set period before the shortfall becomes a material consideration. Also, how will the current uncertainty over the impacts of Brexit and Covid-19 be reflected in the latest housing need predictions, and what effects will this have on the national targets for housing land in NPF4?

We would welcome increased priority being given to social housing and to genuinely affordable housing in sustainable locations; before the pandemic, social and affordable housing were estimated as comprising 65% or more of housing need (Shelter, 2020). Any necessary housing development must happen in the most sustainable places which best help meet Scotland's net-zero targets, rather than making them harder to achieve. This should be delivered via the LDP process rather than by speculative development proposals.

Finally, it is astonishing to read that the SG wants "our homes to be accessible, affordable, well-designed and energy-efficient" by 2040 – surely this should be the case NOW!

## DEVELOPER CONTRIBUTIONS

We support the proposed review of developer contributions, which can be a frequent source of community frustration. We suggest that consideration could be given to reducing the options for non-payment and deferred payment of contributions.

### 3 Do you agree with our current thinking on planning for a wellbeing economy?

**Please give us your views:**

#### LAND USE STRATEGY

We welcome the proposal on p27 to reflect the vision, objectives and framework of the Land Use Strategy (LUS) in NPF4. This is because the character of Scotland's rural landscapes is only partly influenced by those built developments which are subject to the statutory town and planning system; significant change can result from land uses not controlled by that system, particularly agricultural and forestry developments. There is currently a great opportunity for the LUS and NPF4 to pull together in an integrated fashion to jointly address national priorities including the climate emergency and biodiversity crisis.

#### SPACEPORTS

There is only one reference to spaceports, in the list on p26 of proposals which have been submitted as National Developments. This is not good enough for such a controversial issue on which NPF4 should surely demonstrate leadership. Whether Scotland would benefit from having a spaceport, and if so, which would be the least damaging site from a social and environmental point of view, is clearly of national importance. NPF4 is the obvious mechanism for ensuring the appropriate level of debate around these proposals. This would allow consideration to be given to re-using already-developed industrial sites, such as Prestwick or Machrihanish, which might benefit from a new use, rather than causing unnecessary damage to unspoilt greenfield sites. It would also ensure that the proposal is thoroughly tested against the Climate Emergency and that the necessary strategic environmental assessment is carried out.

#### PRIME AGRICULTURAL LAND

There is one reference on p23 to 'high quality agricultural land', but no definition of this term is provided. 'Prime agricultural land' (PAL), however, is the long-established and clearly-defined term for an important and finite resource which is exceptionally valuable for the wide range of crops it can produce. This resource will become increasingly important for greater production of home-grown food and reduced reliance upon food imports. NPF3 correctly pointed out that much of our prime agricultural land is located close to cities, in particular on the east coast where demand for development land is greatest. The weak wording in the current SPP which allows development on PAL "where it is essential as a component of the settlement strategy" should therefore be removed in NPF4 and full protection given to PAL.

### 4 Do you agree with our current thinking on planning for better, greener places?

**Please give us your views:**

#### SCOTLAND'S RURAL LANDSCAPES

The Position Statement gives insufficient recognition to the value of Scotland's rural landscapes. It is noted on p30 that people "value our historic buildings, places and landscapes and recognise their importance to our sense of place, common history and future wellbeing" but this does not feed through to any analysis or proposals. We hope that the following excellent wording from NPF3 can be retained in full:

"Scotland's landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland and all landscapes support place-making. National Scenic Areas and National Parks attract many visitors and reinforce our international image. We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset. Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being."

#### LAND USE STRATEGY

We welcome the acknowledgment on p33 of the "opportunities to link planning more closely to the Land Use Strategy and Regional Land Use Partnerships, to achieve an approach to future development at national, regional and local scales, that more fully supports, and is supported by, wider land use management". We also welcome the explicit commitments on p35 to align NPF4 with the Land Use Strategy (LUS) and to align emerging Regional Spatial Strategies with future Regional Land Use Partnership Frameworks. This is because the character of Scotland's rural landscapes is only partly influenced by those built developments which are subject to the statutory town and planning system; significant change can result from land uses not controlled by that system, particularly agricultural and forestry developments. There is currently a great opportunity for the LUS and NPF4 to pull together in an integrated fashion to jointly address national priorities including the climate emergency and biodiversity crisis.

#### GREEN BELTS

We welcome the proposals to prioritise the re-use of empty buildings and vacant and derelict land, and we are pleased to note that funding is directed at this in the latest National Infrastructure Plan. We agree that regional strategies and Local Development Plans (LDPs) should work collectively to unlock the potential of brownfield land within our existing settlements to provide multiple societal and environmental benefits. This should be promoted by clear policies in NPF4 to require the use of brownfield land first and to limit greenfield development. Development should only be allowed in designated Green Belts in exceptional circumstances and when no brownfield land is available. Any decisions to do so should be taken democratically through the LDP process rather than via speculative applications.

It is unclear what this sentence means: "The relationship between town centres and suburbs and the role of the green belt will also benefit from a long term spatial perspective that reflects our net-zero and environmental ambitions." If, as we hope, it is intended to mean that Green Belts will be given stronger

protection, then the final version of NPF4 will need to say so much more clearly. Local authorities should be encouraged to extend existing Green Belts and to designate new ones.

Green Belt designation should bestow a strong presumption against development. We recognise that Green Belt boundaries can be reallocated during the review of an LDP if this is considered unavoidable and if agreed democratically. However, the piecemeal erosion of Green Belt land by large scale speculative housing developments should be stopped. We are pleased therefore that the Scottish Government has reiterated its commitment to a plan-led system, and hope that NPF4 will strengthen Green Belt protection and remove the threat of its development when contrary to the development plan.

We are pleased to see that the potential for Green Belts to form part of multifunctional green networks which help achieve positive effects for biodiversity, climate and health is recognised. We also welcome the recognition of the other Green Belt purposes: helping to direct sustainable developments to the most appropriate locations within existing urban areas; and enhancing the landscape setting of settlements. We hope that the recommendations put forward in the recent Scottish Government report 'A New Future for Scotland's Town Centres' are implemented. To achieve these multiple benefits and to provide certainty to communities, Green Belts must be protected for the long term.

We would therefore welcome an addition to the definition of Green Belts which clearly sets out their many positive purposes, both as an effective planning tool and as multifunctional green networks with multiple benefits for health, well-being, landscape, biodiversity and climate. These benefits are worth protecting through planning and enhancing through positive management. Recognising the ongoing recreational pressure on local greenspace, and its huge benefits to well-being, the Scottish Government should use NPF4 to promote the positive management of Green Belts for landscape, nature and recreation.

The commitment to provide greater clarity on acceptable uses within designated Green Belts is welcomed, as this is urgently needed. Acceptable uses in Green Belts must be compatible with their existing aims: directing planned growth to the most appropriate locations; protecting and enhancing the surrounding rural landscape; and protecting and giving access to open space within and around towns and cities. They should also help to realise its potential as natural infrastructure, including as part of the Scottish Nature Network. However, this does not go far enough; Green Belt policy certainly needs to be updated, but not only to clarify acceptable uses; it also needs to increase the overall level of protection from speculative development.

## NATIONAL PARKS

We note on p30 that National Parks were raised as a priority by contributors to the Call for Ideas. However, the Position Statement fails to take this forward into any analysis or proposals, although we note that our proposal to designate more National Parks, including in the Borders and in Galloway, features amongst the list of National Developments which have been submitted.

Scotland's first two National Parks provide many benefits to local residents, visitors and Scotland. Lively local campaigns are under way in the Borders and Galloway for National Parks to be designated in their areas. The Scottish Government's own recently-published Environment Strategy clearly stresses the significance of National Parks to its active lifestyle and health agenda:

"The link between nature, an active lifestyle and health is well understood. Scotland's National Parks are delivering on this agenda by supporting high quality walking and cycling infrastructure; and by getting people active through green health partnerships, health walks, outreach and volunteer programmes. The incredible wildlife and landscapes of the National Parks are key to many of the health benefits."

The designation of more National Parks would clearly deliver even more of these nationally-important health benefits.

## NATIONAL SCENIC AREAS

We were disappointed to note that the only reference to National Scenic Areas (NSAs) was on p10 in relation to protection from onshore wind, when NSAs have so much untapped potential for positive management to support all of NPF4's objectives. Most NSAs are little known, woefully under-publicised and lacking in active planned management. Their ability to influence development management in the areas they cover still rests on the text of a 1987 Circular issued by the former Scottish Development Department. We therefore propose that this outdated mechanism should be thoroughly revised and updated and incorporated into NPF4. We note that our proposal for Management Strategies to be prepared for all NSAs has been logged as a proposed National Development, and call for this to be taken forward in order to promote their protection, better management and enhancement

## REGIONAL PARKS

We note on p30 that Regional Parks were raised as a priority by contributors to the Call for Ideas, and we note that the proposed creation of new Regional Parks has been logged as a proposed National Development. However, the Position Statement fails to take this forward into any analysis or proposals.

The original objectives of Scotland's Regional Parks, to encourage healthy outdoor recreation and landscape conservation, are even more valid today, and they also have great potential to help to address current issues of obesity, mental health, the biodiversity crisis and the climate emergency. Scotland's Regional Parks should therefore be relaunched with refreshed objectives supported by new national funding, and the creation of new Regional Parks should be seriously considered, for example in the Ochil or Kilpatrick Hills.

## LOCAL LANDSCAPE AREAS

We were disappointed that the Position Statement makes no reference to Local Landscape Areas. Many of the landscapes most valued by local people in rural Scotland are designated as Local Landscape Areas or Special Landscape Areas. These should be given strong protection from damaging development in NPF4, at the very least by retaining the current SPP wording.

## WILD LAND

This proposal on p36 is worrying: "Given the new requirements in the Planning (Scotland) Act 2019 to support the repopulation of rural Scotland, we will consider

whether our policies on wild land need to change, while ensuring effective safeguards for our natural environment and landscapes". This implies (although does not state) that wild land policy might be weakened, whereas in fact greater protection should be given to wild land. There need be no conflict between repopulating rural Scotland and protecting wild land. This is because wild land will be an important component of the quality of life of any new rural residents and also an important asset for their potential employment prospects, given the increasingly popularity of outdoor activities.

## 5 Do you have further suggestions on how we can deliver our strategy?

Please give us your views:

## 6 Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

Please give us your views:

## 7 Do you have any other comments on the content of the Position Statement?

Please give us your views:

SUSTAINABLE DEVELOPMENT

The word 'sustainable' is used frequently in the Position Statement to describe many different issues, eg 'sustainable travel hierarchy', 'sustainable tourism', 'sustainable rural living' or 'sustainable locations', but is not defined. We believe it would be helpful if a note on the correct definition of sustainable development could be included within NPF4, as well as its agreed principles, preferably in accordance with the Shared UK Principles of Sustainable Development jointly prepared by the devolved administrations and the UK Government in 2005.

SUPPLEMENTARY PLANNING GUIDANCE

We were disappointed that the Position Statement makes no reference to Supplementary Planning Guidance (SPG). The 2019 Planning Act removed the formal status of SPG as part of the development plan. SPG currently provides substantial amounts of detailed technical advice which can be crucial to promoting high-quality development. The Scottish Government must therefore clarify whether the content of such guidance will now be incorporated into NPF4, and if so, how its content can be tailored to support local distinctiveness across the country.

NATIONAL DEVELOPMENTS

Given that the National Developments are presumably intended be an integral part of NPF4, the process for assessing them seems strangely detached from the Position Statement. The phrase "We will consider whether proposed national developments can help us to deliver on this vision" appears at the end of each section, but there is no explanation of how this process will be undertaken or of the criteria against which each will be assessed. The link given does not lead directly to the list of National Developments, which are rather hidden away under 'Resources' and shown on a confusing map-based platform which actually makes it more difficult to understand what has been proposed. Several of the proposals are simply speculative developments for private gain which should be dismissed straight away.

## About you

### What is your name?

Name:

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### Are you responding as an individual or an organisation?

Organisation

### What is your organisation?

Organisation:

The Association for the Protection of Rural Scotland

### The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

**I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.**

I consent

## **Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Slightly satisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Very satisfied

**Please enter comments here.:**