



APRS
The Association for the
Protection of Rural Scotland

DRAFT FOURTH NATIONAL PLANNING FRAMEWORK (NPF4) **CONSULTATION PROCESSES**

THE DOCUMENTS AND HOW TO RESPOND

DRAFT NPF4

Tom Arthur MSP, (Minister for Public Finance, Planning and Community Wealth) launched the Scottish Government's draft Fourth National Planning Framework (NPF4) in November 2021 with a call for as many people as possible to engage with the consultation. There are several opportunities to comment and get involved; details with links to further information are given below.

NPF4 will become part of the Development Plan for the whole of Scotland, so will have an influence on **all planning decisions** for at least a decade once it is finalised and agreed by the Scottish Parliament next year.

The [draft NPF4](#) itself is fairly lengthy but contains several distinct parts including:

- **National Spatial Strategy.** This spatial policy sets out how we may achieve "**Sustainable, Liveable, Productive and Distinctive Places**". It gives some 'spatial principles' [eg a) **Compact growth.** *We will limit urban expansion where brownfield, vacant and derelict land and buildings can be used more efficiently. This will safeguard land to provide the services and resources we will need in the future, including carbon storage, flood risk management, green infrastructure and biodiversity. By increasing the density of settlements we will reduce the need to travel unsustainably and strengthen local living.*] and sets out five **Action Areas** with associated actions [*North and West Coastal Innovation; Northern Revitalisation; North East Transition; Southern Sustainability; Central Urban Transformation*].
- **National Developments.** There are 18 proposals for the status of National Development; this establishes the need for these projects (planning consents are still needed) to help achieve the spatial strategy.
- **National Planning Policy.** This includes **universal policies** [eg *We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits*] which will apply to all planning decisions and **35 subject policies** which will replace the current Scottish Planning Policy (SPP, 2014). **Green Belts** are dealt with in [Policy 29 Urban Edge](#), which is fairly similar to the SPP version but should be strengthened by supportive policies elsewhere in the document. Policy 9 Quality Homes sets out a new approach to the allocation of housing land by planning authorities. Other policies will have impacts on for example protected areas, peatland, woodland and energy.
- **Delivering Our Spatial Strategy.** Delivering NPF4's ambitions will "require collaborative action from the public and private sectors and wider communities".

This section will be further developed as a 'live document' after the framework is adopted, but proposes aligning resources and infrastructure first approach.

- **Annexes.** The three annexes are an NPF4 outcomes statement, housing numbers and a glossary.

In addition there is quite a quantity of [supporting information and resources](#), including background information paper on the housing land figures. Lastly, an **Integrated Impacts Assessment of NPF4** (which covers the [Environmental Report](#); [Life-Cycle Greenhouse Gas Emissions Report](#) for National Developments; [Society and Equalities Impact Assessment](#); and the [Business and Regulatory Impact Assessment](#)) has been published along with a **Non-technical Summary**; some of the questions at the end of the Scottish Government consultation (details below) relate to these documents (Questions 59-70).

THE SCOTTISH GOVERNMENT CONSULTATION ON DRAFT NPF4

The Scottish Government consultation is running until **31 March 2022**. Details of the process are [online](#) and you can respond via the consultation portal (preferred) or via email. The online consultation form has 70 questions and you can answer as many of these as you wish and/or submit via email.

The Scottish Government will be running some online events in January and February on each of the Spatial Strategy action areas and on four themes: Sustainable Places; Liveable Places; Productive Places; Distinctive Places – but details are not available yet. Community groups can apply for small grants to assist with responding. Details are on the [consultation resources](#) page.

THE SCOTTISH PARLIAMENT COMMITTEE SCRUTINY PROCESS

The Scottish Parliament has up to 120 days to scrutinise NPF4 and has to approve the final version. The scrutiny is being led by the [Local Government, Housing and Planning Committee](#) but they have suggested other committees should also input to the process. They have issued a **Call for Views** to the public on the draft document and have posed specific questions that you can respond to with respect to any part of the document. We expect the Committees to take further evidence based on the responses to their consultation and then report their findings on the draft. The questions posed include:

- how can we design our environments to address climate change?
- how do you use space to stay healthy and well?
- how can planning encourage people to live in rural areas?
- how can land and spaces best promote equality?
- how can we use land and spaces to meet biodiversity targets?
- your priorities for your environment and whether the NPF4 will deliver this.

More information and details of how to respond (by submitting an electronic form) are available [here](#). The deadline for submitting your views to the Committee is **10 January 2022**. You could also raise any issues related to NPF4 with [your MSPs](#).

NATURESCOT CONSULTATION ON DEVELOPING WITH NATURE

For anyone interested in the detail of **how biodiversity is dealt with in NPF4**, [NatureScot is consulting on draft guidance on securing positive effects for biodiversity](#), in particular from local developments. This is to inform and fill out the approaches set

out in the draft NPF4. The guidance is aimed at anyone making or considering a planning application for a “local development” **not subject to Environmental Impact Assessment** (EIA is required for any application likely to have significant effects on the environment). Examples include smaller developments of new housing, industrial and retail buildings, amongst others (further information on local, major and national developments can be found in [Circular 5 2009: Hierarchy of Developments](#)).

The Draft NPF4 sets out new requirements for the planning system to take greater account of nature in the decisions it makes. Policy 3 sets out planning policy in response to the Nature Crisis, and 3(e) requires that proposals for local development should only be supported if the application includes ‘appropriate measures’ to enhance biodiversity, in proportion to the nature and scale of development. The NatureScot guidance describes these biodiversity measures, and the considerations that should be taken in to account when determining whether they are appropriate. There is a short survey form with responses due by 4 February 2022.

As APRS develops its views on the NPF4 proposals we will try to inform as many people as possible, via further emails, Facebook, Twitter and our evening APRS Planning webinar on 20 January, when APRS planning experts will be on hand to advise and discuss issues relevant to NPF4 and Local Development Plans. See the [Events page](#) on our website for further details. Please do get in touch if wish to book a place or have any questions that we might be able to help with. Contact details are as follows:

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