

Response ID ANON-8KUC-UGZV-7

Submitted to National Planning Framework (NPF4)

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About you

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I have read and understood how the personal data I provide will be used.

How your response will be published

I would like my response to be published in its entirety

What is your name?

Name:

John Mayhew

What is your email address?

Email:

john@aprs.scot

Are you responding as an individual or on behalf of an organisation?

Organisation

Would like to be contacted about future opportunities to get involved in this work, such as engagement events?

Yes

Organisation details

Name of organisation

Name of organisation:

The Association for the Protection of Rural Scotland

Information about your organisation

Please add information about your organisation in the box below:

APRS is the leading voice for all of Scotland's rural landscapes, working to tackle the climate emergency and to promote sustainable land use for people and nature. We empower local communities, promote effective planning, champion sustainable rural development and raise awareness of the socio-economic benefits of Scotland's rural landscapes. We do this through education, community engagement, innovative projects, high-level advocacy and partnership working. Our core work is funded by the People's Postcode Trust, contributions from projects, charitable trust donations and membership subscriptions. Our work is currently focussed on three projects: the APRS Green Belts Alliance; the Scottish National Parks Strategy Project; and the Have You Got The Bottle? campaign for a deposit return system for drinks containers.

Consultation and development of the draft NPF4

Please provide your views on the consultation and development of NPF4 and how this has contributed to the draft.

Please provide your response in the box provided.:

Please provide your views on the structure of the National Planning Framework 4 document.

Please provide your response in the box provided.:

Please provide your views on the incorporation of the Scottish Planning Policy and coherence of the NPF4 document overall as a roadmap.

Please provide your response in the box provided.:

Part 1 – A National Spatial Strategy for Scotland 2045

What is your view on the Sustainable Places section?

Please provide your response in the box provided.:

We support the general commitment to "creating and strengthening nature networks and investing in nature-based solutions to support nature recovery", but what is really needed is a specific overall National Nature Network as a National Development.

What is your view on the Liveable Places section?

Please provide your response in the box provided.:

What is your view on the Productive Places section?

Please provide your response in the box provided.:

What is your view on the Distinctive Places section?

Please provide your response in the box provided:

What is your view on the 'Spatial principles for Scotland 2045' section?

Please provide your response in the box provided.:

Do you have any other comments on the National Spatial Strategy outlined in NPF4?

Please provide your response in the box provided.:

We welcome the overall tone of the draft NPF4, particularly its clear focus on tackling the climate emergency and nature crisis. However, it needs to set out more clearly how it will prevent unsustainable developments as well as enabling sustainable ones.

It is extraordinary that the draft NPF4 lacks any reference to the national Land Use Strategy (LUS), whereas there should in fact be the strongest possible links between these two documents, as each will contribute significantly to Scotland's response to the climate emergency and the nature crisis. This is because the character of Scotland's rural landscapes is only partly influenced by those built developments subject to the statutory town and planning system and therefore subject to NPF4; significant change can result from land uses not controlled by that system but subject to the LUS, particularly agricultural and forestry developments. There are two passing references to Regional Land Use Partnerships, but NPF4 needs to include a much clearer explanation of the precise relationships between the LUS, NPF4 and their emerging respective regional implementation mechanisms, ie Regional Land Use Frameworks and Regional Spatial Strategies. We made this point in both our submission to the Call for Ideas and our response to the Position Statement, so are very disappointed that it has still not been adopted.

What is your view on the 'Action areas for Scotland 2045' section?

Please enter your response in the box provided? :

Do you have any other comments on the Action areas for Scotland 2045 outlined in NPF4?

Please enter your response the box provided.:

Part 2 – National Developments

Please provide your views on each of the National Developments in the text boxes provided below.

Central Scotland Green Network :

We support this National Development.

National Walking, Cycling and Wheeling Network :

We support this National Development.

Urban Mass/Rapid Transit Networks (Aberdeen, Edinburgh, Glasgow):

Urban, Sustainable Blue and Green drainage solutions :

Circular Economy Material Management Facilities :

We support this National Development.

Digital Fibre Network :

Island Hub for Net Zero :

Industrial Green Transition Zones :

Pumped Hydro Storage :

Hunterston Strategic Asset :

Chapelcross Power Station Redevelopment :

Strategic Renewable Electricity Generation and Transmission Infrastructure :

High Speed Rail :

Clyde Mission :

Aberdeen Harbour :

Dundee Waterfront :

Edinburgh Waterfront :

Stranraer Gateway :

Please provide any other comments on the National Developments section of the NPF4?

Please provide your response in the box provided.:

It is extraordinary that the draft NPF4 makes no reference to the Scottish Government's commitment announced in August 2021 to "... designate at least one new National Park by the end of this session", ie by 2026. This is clearly a major new national spatial priority and one which is explicitly intended to address the climate emergency and nature crisis. It is therefore an obvious candidate for a National Development, even though the process of deciding the locations of the new National Parks will continue after the publication of NPF4. We regard status as a National Development as an important milestone for the delivery of the Scottish Government's commitment to new National Parks. This is highly relevant to NPF4 given the role of National Park Authorities in the planning system.

We welcome the frequent references throughout the draft NPF4 to the value of nature networks. In particular we support the general commitment in the National Spatial Strategy to "creating and strengthening nature networks and investing in nature-based solutions to support nature recovery". However, what is really needed is a specific overall National Nature Network as a National Development, in order to ensure that consistent and comprehensive delivery of nature networks is co-ordinated across all planning authorities.

Part 3 – National Planning Policy

Please provide your views on each of the National Planning Policies in the text boxes provided below.

Policy 1: Plan-led approach to sustainable development :

Policy 2: Climate emergency :

We welcome Policy 2, but note that the Minimum All-Tenure Housing Land Requirement figures given at Annexe B seem to have been produced prior to any consideration of climate implications. It is therefore unclear whether the draft NPF4 is promoting the provision of Scotland's housing needs in the most efficient way possible in terms of land and resource use and therefore of climate impact. The NPF4 policies to promote the reuse of existing buildings via conversion and retrofit for housing, which we support, should be reflected in how housing targets are to be addressed.

Policy 2: Climate emergency c) only requires national, major or EIA developments to have a whole-life assessment of greenhouse gas emissions, so most housing developments won't be affected. Additional wording which considers the emissions associated with different ways of delivering housing should be added to this policy.

Policy 3: Nature crisis :

Policy 4: Human rights and equality :

Policy 5: Community wealth building :

Policy 6: Design, quality and place :

c) we support this requirement to demonstrate how the six qualities of successful places have been incorporated into the design of every development.

Policy 7: Local living :

Policy 8: Infrastructure First :

Policy 9: Quality homes :

a) The Housing Land Requirement (HLR) should not be referred to as the housing target, as this could be misconstrued by developers or the courts. It is an estimate of housing land supply which includes a very large contingency to allow for problems which may emerge with particular sites.

b) This is a preferable approach to that in the existing Scottish Planning Policy, but further details are required on the Delivery Programme and on how Housing Land Audits will be improved to remove concerns about their reliability raised in recent Scottish Government research.

c) The requirement to allocate land in "sustainable locations" requires a clear definition of what this means. The requirement to be consistent with the

principles of 20 minute neighbourhoods is very important.

e) Provision should be made for local communities to be invited to assess the "statement of community benefit", as they may not share developers' views on the balance between positive and negative impacts of development. It is worth noting that proposals for fewer than 50 dwellings can have significant impacts on local communities, particularly in rural areas.

i) We support this policy, but seek clarification regarding the process to be followed regarding the exception set out in the first bullet point, to ensure that it is the planning authority which determines progress in delivery rather than developers or the courts. We would like to see Green Belts policies added to those included in the third bullet point.

Policy 10: Sustainable transport :

Policy 11: Heat and cooling :

Policy 12: Blue and green infrastructure, play and sport :

Policy 13: Sustainable flood risk and water management :

Policies 14: Health and Wellbeing :

Policies 15: Safety :

Policy 16: Land and premises for business and employment :

Policy 17: Sustainable tourism :

Policy 18: Culture and creativity :

Policy 19: Green energy :

Policy 20: Zero waste :

Policy 21: Aquaculture :

Policy 22: Minerals :

Policy 23: Digital infrastructure :

Policies 24 to 27: Distinctive places :

Policy 24: Centres - we support this policy.

Policy 25: Retail - we support this policy, particularly a) that out-of-town locations for retail development should not be supported.

Policy 26: Town centre first assessment - we support this policy, particularly the requirement to demonstrate no adverse climate impact.

Policy 27: Town Centre Living - we support this policy.

Policy 28: Historic assets and places :

Policy 29: Urban edges and the green belt :

The title of this Policy in the text of NPF4 should read "Urban Edges and the Green Belt" rather than just "Urban edges" as it does at present.

a) we support this policy, particularly the specific references to the roles of Green Belts in benefiting quality of life and minimising unsustainable travel.

b) we support this policy, but are concerned that the reference to "directly connected retailing" in the second bullet could be used to justify very large garden centres with substantial associated catering and retail developments which encourage unsustainable travel.

c) we support this policy, but as the first bullet refers to "the purpose of the green belt" without stating what that purpose is, we suggest that such a statement should be added.

d) we support this policy.

Policy 30: Vacant and derelict land:

a) we support this policy.

b) we support this policy.

c) we support this policy, but the second part of it appears to open an unnecessary loophole by suggesting that proposals on greenfield sites not allocated for development could be supported in some circumstances.

e) we support this policy, but it should also require consideration of the embodied energy contained in existing buildings.

Policy 31: Rural places :

b) the proviso that any proposal considered under this policy must be consistent with climate change mitigation is important here.

c) the support for proposals that "reuse vacant and derelict land or brownfield where a return to the natural state is not likely" demands a definition of "natural state" and an assessment of whether this would provide more public benefit than the proposed development, including for climate and nature.

d) the reference to minimising the use of "good quality land" requires a clear definition of what constitutes such land; we presume this is not the same as "prime agricultural land".

f) we support this policy.

h) we support the clear intention to protect prime agricultural land set out here, but this important commitment is seriously weakened by the five exceptions, which could easily be exploited as loopholes resulting in gradual attrition of this nationally important resource; the wording should therefore be significantly tightened in the final version.

Policy 32: Natural places :

a) we support the commitment to establish and grow nature networks, but what is really needed is a specific overall National Nature Network as a National Development.

b) we support this policy.

d) we welcome the reference to the National Parks (Scotland) Act 2000, but suggest referring in particular to Section 9(6) which sets out a version of the long-established and important Sandford Principle.

h) we support this reference to the precautionary principle.

i) we support the protection of Wild Land Areas set out here.

Policy 33: Peat and carbon rich soils :

We support this policy, but there are far too many exceptions at d) - surely the conservation of our remaining peatlands is so important that no new commercial peat extraction should be allowed at all.

Policy 34: Trees, woodland and forestry :

a) and b) we support these policies.

Policy 35: Coasts :

Part 4 – Delivering Our Spatial Strategy

Please provide your views on each of the key delivery mechanisms in the text boxes provided below.

Aligning Resources :

Infrastructure First :

Delivery of National Developments :

Development Plan Policy and Regional Spatial Strategies :

Monitoring :

Part 5 - Annexes

Please provide your views on Annex A.

Please provide your response in the text box provided.:

Please provide your views on Annex B.

Please provide your response in the box provided. :

Any other comments on the NPF4 Draft

Do you have anything else to add in relation to the draft of the National Planning Framework (NPF4)?

Please provide your response in the box provided. :

Annex C should include a definition of Green Belt. We suggest:

Green Belts are areas of open land around, beside or within a settlement where there is a presumption against most forms of development. The purposes of Green Belts are to protect the valued landscape settings of settlements and to prevent urban sprawl by directing development to more appropriate sites. Green Belts can also provide significant benefits for climate mitigation, nature recovery, public access and recreation, particularly given their proximity to centres of population. Green Belt boundaries are designated by Local Planning Authorities in Local Development Plans.