

Questions - Part 1 – A National Spatial Strategy for Scotland 2045

1 Sustainable places. Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment. Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?:

We welcome the references in the draft NPF4 to tackling the climate emergency and nature crisis. However, it seems to lack the required urgency necessary to achieve the ambitions it sets out. The Framework must ensure that every planning decision helps to make Scotland a more sustainable place, so it must be just as clear that unsustainable developments will be prevented as that sustainable ones will be enabled. Developments that contribute to net climate emissions or result in a loss of biodiversity are no longer acceptable.

We support the general commitment to "creating and strengthening nature networks and investing in nature-based solutions to support nature recovery", but a strategy for an overall National Nature Network is required. Making this a National Development would be a clear signal that the Scottish Government is serious about delivering a nature positive Scotland.

It is extraordinary that the draft NPF4 lacks any reference to the national Land Use Strategy (LUS), despite this being raised as a concern in both the Call for Ideas and in response to the Position Statement. There should be the strongest possible links between the NPF4 and LUS, as each will contribute significantly to Scotland's response to the climate emergency and the nature crisis. A clear link is needed because the character of Scotland's rural landscapes is only partly influenced by those built developments subject to the statutory town and country 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 in NPF4, but it 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. Clarifying the relationship between the Framework and the LUS should help to allay some concerns that have been expressed about NPF4 being too urban-focused.

To deliver net-zero, nature-positive places, planning departments need better resourcing including of support services (eg ecologists) and planners and Councillors will need training, eg in carbon accounting and net biodiversity gain, to understand how to assess cases and to ensure planning decisions are in line with NPF4's aims.

2 Liveable places. Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?:

We support the aims of the approach, but rather than just a "hope to empower more people to shape their places" we would like to see communities being given both the resources and active support to develop community-led Local Place Plans and a right to appeal planning decisions to approve permission; particularly on proposals that are potentially not in the long-term public interest or do not conform with agreed development plans. Communities need a level playing field, where they are recognised as key stakeholders and given the same rights within the planning system as developers.

3 Productive places. Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing. Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?:

4 Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?:

APRS welcomes the statements under "Distinctive Places" that commit to responding to the global biodiversity crisis by putting nature recovery and connected blue and green infrastructure "at the heart of all future places" and of safeguarding "our shared heritage for future generations". Protected landscapes can be a key part of such a response.

Scottish Government has resisted our previous calls (see under Q21 below) for new National Parks to be included as a National Development in NPF4, seemingly on the basis that the location (or locations) are not yet decided. If, despite the commitment in the Scottish Government and Scottish Green

Party - Shared Policy Programme, this is still the SG's view, we suggest that the creation of one or more new National Parks should be highlighted at the start of the Spatial Strategy under "Distinctive Places", because the stated aspirations there very much align with the aims of National Parks in the 2000 Act. The new Parks will be designated within the timeframe of NPF4 and will have implications for the planning system in those areas, but most importantly can be a landscape-scale tool in moving to being a more "nature-positive and resource efficient" country.

5 Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?:

6 Spatial principles. Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

Do you agree that these spatial principles will enable the right choices to be made about where development should be located?:

The six overarching principles are presented as the basis for the NPF strategy and policies for building a "climate conscious and nature-positive future" and are generally welcomed. One noticeable omission from the principles is that, despite multiple references to nature and biodiversity (and enhancing and benefiting it), there is no commitment to protect existing biodiversity from damage by development. The mitigation hierarchy, starting with avoidance of damage to biodiversity, needs to be made clearer across the NPF.

In order to enable the right choices to be made about development, it should be made clear here (given it is stated that the spatial principles underpin both the NPF spatial strategy and the policies), that decision-makers should use the spatial principles to guide decisions, especially if a case arises where the spatial strategy and policy seem to conflict?

It would be helpful for links with other National Strategies and legislation that underpin or reinforce these principles to be noted. The previous NPF included a table of a policy hierarchy and something similar would be helpful. For example, for rural areas it could indicate how these six principles and the resulting NPF policies interact with the Land Use Strategy.

7 Spatial Strategy Action Areas. Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?:

8 North and west coastal innovation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

9 North and west coastal innovation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

10 Northern revitalisation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

11 Northern revitalisation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

We welcome the reference to the Cairngorms National Park under Action 7, including its clear recognition that the benefits of the National Park's holistic approach extend well beyond its boundary. We suggest that it should be stressed here how important it is that all public bodies should further the aims of the National Park Plan, including when responding to planning applications.

12 North east transition. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

13 North east transition. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

14 Central urban transformation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

We welcome the recognition of the role that Country Parks and National Parks can play in protecting high quality environments. However, we are concerned that the proposal here to "reimagine development on the urban fringe" lacks clarity and its interpretation could sit uncomfortably with Policy 29.

15 Central urban transformation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area? :

We particularly welcome the wording under Action 20, which mirrors the benefits of and necessity for designating Green Belts around pressurised urban areas. However, its title ("Reimagine development on the urban fringe") sits rather uncomfortably with the proposals and with Policy 29. We also support the recognition of the landscape-scale opportunities that the Loch Lomond and the Trossachs National Park offers for nature conservation and climate benefits. However, protection of biodiversity assets needs to be emphasised alongside "restoration and enhancement".

16 Southern sustainability. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

17 Southern sustainability. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

18 National Spatial Strategy. What are your overall views on this proposed national spatial strategy?

What are your overall views on this proposed national spatial strategy?:

Questions - Part 2 - National developments

19 Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?

Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?:

20 Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?:

21 Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?:

APRS would like to see the creation of new National Parks included in the list of National Developments. The proposal was previously assessed by SG prior to the publication of the draft NPF4 and deemed to be "Broad strategy rather than specific project or development proposals" and not suitable for this status (Annex D, Report of Assessment for the Draft National Developments).

However, given the Scottish Government's recent firm commitment to designate at least one new National Park in the current parliamentary session, we urge this decision to be reconsidered. New National Parks will be place-based; of national status; have implications for the planning regime of any area selected, and, most importantly, the aims of National Park status will help address the nature and climate emergency at a landscape scale - key ambitions of NPF4. The Scottish Government and Scottish Green Party - Shared Policy Programme recognised that National Parks can benefit the economy and the environment, "support progressive development, address the climate emergency in the way we use our land, and improve public and community wellbeing" (p.40) and committed to funding this. The benefits and opportunities offered by Scotland's two existing National Parks are highlighted in the National Spatial Strategy, so those offered by the creation of new National Parks should be highlighted here too.

Questions - Part 3 - National Planning Policy

22 Sustainable Places. 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. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions? :

Yes - addressing climate change and nature recovery should be the primary guiding principles. The introduction to Part 1 - A National Spatial Strategy for Scotland 2045 - states that "we must embrace and deliver radical changes so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing...". The new NPF needs to make the required radical changes clearer and also make it clearer to decision-makers which of the National Policies should be given more weight than others, so as to ensure that all approved development is in line with these principles.

It is imperative that the way we plan and manage places helps to tackle the climate and nature crises; managing and controlling development and explicitly preventing some development which is unsustainable or which will lock in future carbon emissions are necessary parts of this.

NPF4 must encourage development that supports mitigation and adaptation to climate change, but must also place requirements on all developments to contribute to net-zero and biodiversity net-gain targets, or at the very least not to have a negative impact on meeting them.

We support the first two paragraphs, although we suggest the following changes:

In paragraph 2, "Economic prosperity" could be changed to "economic resilience" so as to better support Community Wealth Building and link to policy 5.

The sentence before policy 1 should change to:

"The following Universal Policies apply to all planning decisions" (ie remove "should").

23 Policy 1: Plan-led approach to sustainable development. Do you agree with this policy approach?

Do you agree with this policy approach?:

We agree that all local development plans should manage the use and development of land in the long term public interest and we support the link to the national outcomes and UN Sustainable Development Goals. However, the NPF needs to clarify how it ensures that the plan-led approach will be adhered to, and we have the following questions about this policy:

- How will Policy 1 actually ensure that the plan-led approach is adhered to?
- What can communities do if a decision affecting their locality is contrary to the development plan?
- Will the Scottish Government monitor whether or not planning decisions are in line with local development plans?
- Does there need to be a stronger statement about planning decisions adhering to the development plan? This could be a presumption against most development contrary to the local development plan (see also our comments on Policy 9, where there is a partial presumption against non-allocated housing developments but with too many exceptions).
- What will happen if a local development plan (LDP) is ignored in a planning decision?
- How will the transition period before new LDPs are adopted be managed?
- How will the long term public interest be assessed and by whom?
- How can the public appeal a decision that they believe is not plan-led or not in the long-term public interest?

24 Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency? :

No, while we welcome the policy intention that significant weight must be given to the global climate emergency, we believe that Policy 2 is only a step in the right direction and needs strengthening, along with more prioritisation and clarification elsewhere in the document.

If this policy is to ensure that the planning system takes account of the need to address the climate emergency, it should include an additional clause that covers the requirement for planning and local development plans to address the climate emergency and work together to eliminate or minimise emissions. Currently Policy 2 only focuses on individual development proposals which could result in an uncoordinated approach. (For comparison Policy 3 includes a clause on development plans and Policy 4 has a clause relating to "planning", which presumably means the planning system as a whole).

2a - We strongly support Policy 2a.

An addition should be made to policy 2 to make it clear that giving significant weight to the climate emergency and ensuring proposed development is in the long-term public interest will require the restriction of some types of development. Decisions that take into account circular economy, embodied carbon/energy and the lowering of resource use could require consideration to be given to alternatives, including no development.

2b - How does Policy 2b apply to developments where the decarbonisation pathway is not clear? Where are the pathways listed?

2c - Policy 2c refers to significant emissions without defining what that means. New housing at the scale proposed in the MATHLR will certainly produce significant emissions in the development phase and over its whole life-cycle, especially taken "in combination with other proposals, allocations or consented development". "Significant emissions" should be defined, and it should be made clear that housing is included in this policy. It seems unlikely that development that involves the generation of "significant emissions" can be considered in the long-term public interest.

2c - Policy 2c includes the phrase "for the development to be viable" and appears to put viability for commercial developments on a par with "development in the long-term public interest". Commercial viability should not be used to excuse the generation of significant emissions.

2c - We support the introduction of whole-life assessments of a development's greenhouse gas emissions but this should rapidly be introduced for housing developments below the national, major, or EIA thresholds set out.

2c - Off-setting will have the effect of locking-in future emissions from high-emitting developments and activities and should not become a commonplace alternative to lowering emissions. Off-setting measures will come with their own risks and environmental impacts. Whilst we are glad to see a mention of nature-based solutions in 2c, this is not given as much prominence or clarity as required. Furthermore, as nature-based solutions require assignment of land management for this purpose, how is land going to be allocated for nature-based solutions and off-setting and, if so, for how long (in perpetuity?) does that allocation and management requirement last? Will these off-setting requirements become legal planning conditions so that they can be enforced?

Policy 2d - we strongly support Policy 2d.

25 Policy 3: Nature crisis. Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis? :

No, Policy 3 will not ensure that the planning system takes account of the need to address the nature crisis, as there is no mention of considering the option of preventing development in order to safeguard existing biodiversity. Furthermore despite multiple mentions of "nature networks", the policy does not indicate how local authorities are to create nature networks and how this will be done strategically across Scotland.

As currently worded, Policy 3a begins by stating "Development plans should facilitate biodiversity enhancement, nature recovery and nature restoration across the development plan area". The use of the word "should" means that this is optional and "facilitate" does not signal the strong, leading position that LDPs should take. This statement must be strengthened; for instance the wording could be changed to: "Development plans must support and encourage the delivery of biodiversity enhancement, nature recovery and nature restoration across the development plan area".

3a - We need clarification on "creation of nature networks". Is this a land designation/allocation? How will it be strategically joined up at the national level and across local authority boundaries? 3a currently suggests a piecemeal approach rather than a strategic response to a crisis.

3b - Policy 3b needs to say "must" not "should". It needs to specify what a nature network is, or reference a national strategy that defines them and sets out what is required of local authorities and planning decisions. 3b needs to relate to stronger biodiversity guidance where all the terms used here are defined, including: contribute; enhancement; degraded; restoring; building and strengthening nature networks and the connections between them. What is expected from whom, where and when?

Policy 3c - We would support Policy 3c if, firstly, there were recognition that some development will need to be restricted to achieve minimal adverse impacts and, secondly, it addressed the need for clear guidance on how the "careful planning and design" will be assessed. How will the government resource this?

3d - We generally support the first sentence of Policy 3d and the bullet points, but have the following questions:

- How will it be demonstrated that the proposal will conserve and enhance biodiversity and how will this be monitored?
- Where is the mitigation hierarchy defined?
- In the fourth bullet how are "reasonable timescale" and "reasonable certainty" defined?
- Should Policy 3d also apply to large housing schemes even if not subject to EIA?

Applications for farmed fish or shellfish development should not be excluded from this requirement. Policy 3 should apply to all development in the same way that Policy 2 does.

Policy 3e - applications for farmed fish or shellfish development should not be excluded from policy 3e or from 3d. The implication of their exclusion seems to be an unjustified acceptance of any negative impacts on biodiversity from them.

Policy 3e - it is peculiar, given that this policy is about the nature crisis, that this requirement is framed in "measures in proportion to the nature and scale of the local development" rather than the priority being the best outcome for biodiversity.

26 Policy 4: Human rights and equality. Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?:

No. Policy 4 rightly raises the need for planning to consider human rights and promote equality but gives little indication as to how this will be done. In terms of the expectations on communities to engage proportionately and meaningfully, the absence of an equal right of appeal for communities against planning decisions means that they start any engagement from a position of disadvantage. Despite this, Policy 4b places the same responsibility on communities as it does on planning authorities, applicants and key agencies.

How does the likely unequal coverage of Local Place Plans sit with this policy?

27 Policy 5: Community wealth building Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Do you agree that planning policy should support community wealth building, and does this policy deliver this?:

Yes, we agree that planning policy should support community wealth building, but Policy 5 seems very underdeveloped. Community wealth building should be defined in the Glossary.

In Policy 5b it is not clear why only national and major developments should contribute to CWB objectives rather than all but the most minor developments? For instance, most large housing developments would not be included in the current wording, but no reason is given for why they couldn't be.

28 Policy 6: Design, quality and place. Do you agree that this policy will enable the planning system to promote design, quality and place?

Do you agree that this policy will enable the planning system to promote design, quality and place?:

Yes, Policy 6 will promote good design, quality and placemaking. We particularly welcome Policies 6c and 6d. The Six Qualities of Successful Places are key to achieving many of the other overarching policy aims of NPF but also wider Scottish Government outcomes relating to health and wellbeing, efficient and climate- and nature-positive use of land and resources, circular economy principles and, importantly, valuing natural and cultural landscapes.

We also support Policy 6e.

29 Policy 7: Local living. Do you agree that this policy sufficiently addresses the need to support local living?

Do you agree that this policy sufficiently addresses the need to support local living? :

We welcome the focus of the 20 minute neighbourhood concept on reducing people's need to travel by unsustainable means and on encouraging healthier and flourishing mixed communities. We welcome the recognition in Policy 7a of the importance of providing communities with local access to natural spaces as well as to other facilities. However, the "principles of 20 minute neighbourhoods" mentioned in 7b should be defined, referenced or included in the Glossary.

30 Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?:

APRS supports the Infrastructure First approach, but notes that infrastructure needs to be defined as it can mean different things to different groups. We suggest that the same definition as used in the Infrastructure Investment Plan should be used, as this includes natural infrastructure.

We welcome the reference to the "drive towards a more sustainable use of infrastructure", and to "making better use of existing assets".

31 Policy 9: Quality homes. Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?:

No. There is particular concern that the "sustainable" aspect of this policy aspiration needs more thought in order to deliver climate- and nature-friendly housing. Rather than this slightly modified "business as usual" approach, we would like to see a more transformative approach taken in draft NPF4 to find the most effective way of delivering housing needs in a climate and nature emergency. There is a need for more affordable homes for those unable to afford market-rate housing and for a greater variety of types of dwelling to suit a range of needs. But new housebuilding, the infrastructure required and the subsequent use of new homes will all generate emissions, however well they are designed. And if badly planned, they will generate even more. In addition, unsustainable house-building is storing up downstream costs and problems for later that taxpayers end up suffering or paying for in social terms including non-active lifestyles, pollution, paucity of greenspace and connection with nature and the straining of health and education services.

We welcome the statement about better energy efficient housing supporting a greener, fairer and more inclusive wellbeing economy and would like to see a stronger link made to community wealth building. It is of concern that housing seems to have been excluded from several of the conditions relating to climate and biodiversity - see comments on Policies 2 and 3. Further more it is not clear how overall climate emissions from housing delivery will be assessed, other than on a partial per development basis under 2c. Presumably it will be left to local authorities to determine at the Local Development Plan stage when the emissions of housing provision through retrofit and refurbishment of existing buildings, using empty homes and the re-use of brownfield sites rather than new build should be considered. Whilst the alternatives to new build are promoted by policies elsewhere in the draft, the policy around the HLR and the MATHLR doesn't seem to consider them.

We support the removal from National Policy of the presumption in favour of development that contributes to sustainable development in Scottish Planning Policy (2014), which has contributed to problematic decisions permitting housebuilding on designated Green Belt and other unallocated greenfield sites. The Scottish Government must resist the insertion of any new version of the so-called "tilted balance" or similar mechanism into NPF4 or the Delivery Programme, as this would undermine the universal policies, the wider climate and biodiversity policy intentions of the framework and its underpinning spatial principles.

It is suggested that in order to aid understanding for laypeople/communities that it is explained in the text of the NPF rather than supporting documents that the figures calculated for the Housing Land Requirement (HLR) and the MATHLR (referred to in Policy 9) include a generous uplift as a contingency for anticipated difficulties in developing some of the allocated housing sites. We suggest that some of the terminology in the draft is further clarified to ensure the primacy of the development plan and that local authorities are able to direct new housing to the most sustainable locations making the most of existing infrastructure.

We agree that the location of allocations for new homes should be consistent with the principles of 20 minute neighbourhoods (Policy 9c) and an infrastructure-first approach (Policy 9c) and that development proposals should reflect the six qualities of successful places (Policy 9d).

We strongly suggest that the HLR should not be referred to as the housing target, as it is in Policy 9a, as this could be misconstrued. We understand that the HLR is an estimate of housing land supply which includes a very large contingency (25-30%) to allow for problems which may emerge with particular sites. Surely the Housing Supply Target (HST), required in Local Housing Strategies, is closer to a housing target, whereas the HLR is a means of helping achieve the HST? The term "housing target" implies that all the HLR allocated land is to be built on, thereby ignoring the sizeable generosity/flexibility built in to allow contingency for problems with delivery. In other words, the HLR already contains a back-up supply of housing land.

The deliverable housing land pipeline proposed in Policy 9b seems a preferable approach to that in the existing Scottish Planning Policy in many ways, but further details are required on the Delivery Programme and on how Housing Land Audits will be improved to remove concerns about their reliability (as raised in recent Scottish Government research). There are still concerns that arguments similar to the current ones over effective housing land figures could continue, albeit focused on "deliverable land" and the Delivery Programme and pipeline management rather than local development plans.

In Policy 9c 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 and may need clarifying.

In Policy 9e the proposal seems to have no input, consideration or approval from the actual community. 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. The proposed threshold of 50 dwellings is too high, as proposals for fewer than 50 dwellings can have significant impacts on local communities, particularly in rural areas. Will the benefits promised become planning conditions, or how else will they be monitored?

We very much support the first sentence of Policy 9i: “New homes on land not identified for housebuilding should not be supported”, which is underpinned by Policy 1 Plan-led approach to sustainable development. The wording of the exception set out in the first bullet should be clarified to ensure it is understood it is intended to incentivise faster build out, and that it is the planning authority which determines progress in delivery rather than developers. Given that we don’t know how delivery programmes will be developed, there is concern this could be an area of disagreement and conflict over what exactly “progress in the build-out of sites” means.

There is a wider concern, that if an additional site is brought in with the agreed timescale for development specified in the second bullet point, it is probable that, in the absence of improved demand, the new site will simply take the place of capacity that would have come forward from the existing stock. The net effect on the development pipeline is likely to be negligible and could result in the more difficult to develop sites in the pipeline being by-passed. Policy 9i could thus lead to the needless addition of less sustainable housing sites.

In Policy 9i we strongly support the third bullet focussed on the plan-led system and which emphasises relevant policies and it must be retained. We would like to see Green Belts added to those policies included in the third bullet point.

We welcome the support for a moratorium on greenfield housing developments around urban centres (as recommended in the Town Centres Review 2021) given by draft NPF4 Policies 29d and 30c.

32 Policy 10: Sustainable transport. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?:

We agree that the planning system should support development that minimises the need to travel unsustainably, and particularly welcome Policy 10g: “Design of new transport infrastructure can be a valuable opportunity to incorporate blue and green infrastructure and nature rich habitats (such as natural planting or water systems) where possible.”

33 Policy 11: heat and cooling. Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures? :

34 Policy 12: Blue and green infrastructure, play and sport. Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?:

We welcome the aims of the policy which seeks to support and enhance blue and green infrastructure and the recognition of the wide range of benefits it offers.

We would like to see the importance of the right of responsible access on open land and of existing access routes specifically recognised in the policy.

This policy should not be seen as a substitute for a National Nature Network which would have a different, strategic function. Furthermore, this policy is focussed on settlements and edge of settlement areas so would not include nature-rich places across the whole of Scotland.

35 Policy 13: Sustainable flood risk and water management. Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?

Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?:

We would like to see recognition of the need to protect and enhance the contribution of undeveloped open land (including Green Belt) around urban centres to enable natural flood risk management.

36 Policies 14 and 15 – Health, wellbeing and safety. Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?:

We would like to see greater clarity that development proposals that will be detrimental to active lifestyles, health and wellbeing will not be supported.

37 Policy 16 – land and premises for business and employment. Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?:

Questions - Part 3 - National Planning Policy continued

38 Policy 17: Sustainable tourism. Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?:

Yes, and this would be another good place to refer to the benefits to the tourism industry of the existing and the promised new National Parks.

39 Policy 18: Culture and creativity. Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?:

40 Policy 19: Green energy. Do you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?

Do you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?:

We need renewable energy to tackle the climate crisis, but it must be recognised that renewable energy developments often have impacts on landscape and nature. Therefore, a plan-led approach must recognise constraints on development and guide development to most suitable areas. This means that the requirement to produce spatial locational guidance at local authority level, which is in the current SPP, should be reinstated.

Given the climate emergency and net zero target, large biomass plants are unlikely to be suitable for inclusion as renewable generation, as there is a need to consider lifecycle carbon emissions. The demand for bioenergy feedstocks can also pose risks to wildlife and habitats. "Renewable energy" and "low carbon fuels" are not currently defined in Policy 19, but should be. If hydrogen is included, a clear distinction should be made between so-called "green" and "blue" hydrogen. The policy wording should be strengthened to ensure that solar arrays do not adversely affect protected species and habitats, and this should be included in the list of considerations for solar development.

Wind farms often impact on peat and carbon-rich soils. Guidance needs to be provided on how to assess impacts on these areas, including the impact on carbon released when such soils are disturbed by development.

41 Policy 20: Zero waste. Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?:

42 Policy 21: Aquaculture. Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?

Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?:

43 Policy 22: Minerals. Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?:

44 Policy 23: Digital infrastructure. Do you agree that this policy ensures all of our places will be digitally connected?

Do you agree that this policy ensures all of our places will be digitally connected?:

45 Policies 24 to 27 – Distinctive places. Do you agree that these policies will ensure Scotland's places will support low carbon urban living?

Do you agree that these policies will ensure Scotland's places will support low carbon urban living?:

Policy 24: Centres - we support this policy.

Policy 25: Retail - we support this policy, particularly 25a 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.

46 Policy 28: Historic assets and places. Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings?

Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings? :

47 Policy 29: Urban edges and the green belt. Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?:

Yes, we strongly support Policy 29 and the clear setting out of the multiple benefits of Green Belts in the two paragraphs of preamble and in Policy 29a. We support the clear link in Policy 29a between the use and protection of Green Belts and the prevention of unsustainable development with resulting benefits to the environment and quality of life. We support Policy 29a, particularly the specific references to the roles of Green Belts in benefiting quality of life and minimising unsustainable travel, and hope that the Scottish Government will encourage the designation of further Green Belts in pressurised areas, where appropriate.

We strongly support the presumption against most types of development on Green Belt as set out in 29b, but suggest that it should be made clear that all the potential exceptions in 29b, not just the fourth bullet on recreation and sport, should be compatible with a countryside or natural setting. The mainly open landscape of the Green Belt should be protected, as should the ability for people to access it responsibly.

We are also concerned that the reference to "directly connected retailing" in the second bullet of 29b needs to be tightened up, as it could be used to justify more large retail garden centres with substantial associated catering and retail developments which encourage unsustainable travel rather than on-site horticulture or market gardening.

We ask for a tighter definition of "established need" for development as referred to in the fifth bullet of Policy 29b, particularly given the climate and biodiversity crises and the cumulative cost to the environment of all development.

We strongly support Policy 29c, including the four bullets. However, the first bullet refers to "the purpose of the Green Belt at that location" without explaining what that purpose might be and where it is stated. So we suggest that a clarification should be added to the effect that all the roles, uses and benefits given in the preamble to the policy (under Urban edges and the green belt) and those purposes mentioned in 29a are considered "purposes".

We agree with the part of 29c that says that the primary consideration will be whether the development could instead be located on an alternative site outwith the Green Belt and why a Green Belt location is essential. The subsequent wording relating to the "qualities of successful places" should mirror that used elsewhere in the document and say "the six qualities of successful places" to make clear it refers to those set out in Policy 6.

We strongly support Policy 29d, which in conjunction with 30c will help to strengthen many of the other policies in the NPF4 aimed at reducing emissions, protecting countryside and biodiversity and making settlements more liveable and sustainable.

Overall we welcome the suite of policies in the draft NPF4 that together mean that shortfalls in housing land supply calculations will no longer be considered a valid reason for allowing otherwise unacceptable speculative housing development on Green Belt land.

Local development plans should promote the positive management of Green Belt areas for wider environmental, landscape and recreation benefits.

Additionally, we suggest that the term "Green Belt" is added to the Glossary so that all stakeholders have a clear definition to refer to, and would suggest the following:

"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."

For consistency the title of Policy 29 in the text of NPF4 should read "Urban Edges and the Green Belt" rather than just "Urban edges" as it does at present.

48 Policy 30: Vacant and derelict land. Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?:

Yes, as well as the benefits to communities affected, Policy 30 is supported as a key policy in shifting the development mindset towards how we transform our approach to development to better consider the climate and biodiversity crises, land use, food production, health and wellbeing.

We strongly support Policies 30a and 30b.

We strongly support Policy 30c - that greenfield sites should not be supported for development unless the site is allocated in the development plan or the proposal is explicitly supported in the development plan, and there are no suitable brownfield alternatives. This also underlines the need for a strong link between NPF4, the Land Use Strategy and Regional Land Use Strategies.

In addition to strongly supporting Policy 30 e we would like to see NPF4 refer to the embodied energy and carbon in existing buildings and give a clear signpost as to how this will be more urgently addressed by the planning system. We generally welcome the re-use of existing housing stock and other existing buildings and bringing empty homes back into use. This is good both in terms of reducing carbon emissions and reducing the need for further greenfield expansion.

Policy 30 should include a requirement that a full assessment is made of the contribution existing brownfield sites make to biodiversity and this should be considered in the development decision.

49 Policy 31: Rural places. Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

Do you agree that this policy will ensure that rural places can be vibrant and sustainable? :

In 31b the proviso that any proposal considered under this policy must be consistent with climate change mitigation targets is important - as it is everywhere else too.

In 31c 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.

In Policy 31d 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".

We support Policy 31f and would add that the consideration of designating Green Belts in such areas may be appropriate in the local development plan.

In 31g there should be a definition of "sustainable development" as this could be viewed very broadly. It could be linked to the third bullet which is similarly broad but does mention environmental protection policies.

We support the clear intention to protect prime agricultural land and culturally or locally important land, set out in Policy 31h. However, 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.

50 Policy 32: Natural places. Do you agree that this policy will protect and restore natural places?

Do you agree that this policy will protect and restore natural places?:

It is positive that it is recognised that Scotland's natural environment underpins all our other aims and we welcome the recognition here that "the planning system should protect, restore and enhance Scotland's natural assets". However, much stronger wording in Policy 32 and elsewhere in the framework is needed to ensure that protection is offered by the planning system.

We support 32a and the commitment to establish and grow nature networks, but a national, strategic approach to doing so is needed.

We agree with 32b but given the nature crisis, stronger direction as to what "unacceptable impact" means is required. All public bodies have a legal duty to further the conservation of biodiversity and this must be reflected in this policy.

Policy 32c needs to clearly set out that development should not damage European sites and there is a very strong presumption against this.

We welcome the reference to the National Parks (Scotland) Act 2000 in Policy 32d but suggest it should also reiterate Section 9(6) of the Act, which sets out a version of the long-established and important Sandford Principle.

We support the reference to the precautionary principle in 32h and the protection of Wild Land Areas as set out in 32i.

51 Policy 33: Peat and carbon rich soils. Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands? :

We support this policy, but there are too many potential exceptions at d) - surely the conservation of our remaining peatlands is so important that no new commercial peat extraction should be allowed at all. The nationally important industry should be named to make the specific context for a decision clear.

We agree that local development plans should protect valued soils. However, Policy 33c still states that certain development could be acceptable on peatland and carbon-rich soils. Cumulatively these could be significant. The language should be tightened up to ensure fewer loopholes, and exceptions must be monitored and measured to determine the level of resulting peatland loss. There needs to be clear guidance on how decision-makers assess what are acceptable impacts on peat and on how to assess the likely effects of development on CO2 emissions. There is no mention of the carbon calculator currently used in the assessment of wind farms of 50MW and above.

52 Policy 34 – Trees, woodland and forestry: Do you agree that this policy will expand woodland cover and protect existing woodland?

Do you agree that this policy will expand woodland cover and protect existing woodland?:

This is a considerable improvement on the ambiguity of current Scottish Planning Policy and has the potential to eliminate inappropriate development as a threat to ancient woodlands, and ancient and veteran trees. We welcome the acknowledgement of the importance of trees and woodland to meeting

climate targets and reversing biodiversity loss and the new protections given to ancient woodlands and veteran trees. We agree that local development plans should identify and protect existing woodlands and identify potential for woodland expansion – but expansion must be sensitive to other habitats that have a high biodiversity value.

53 Policy 35: Coasts. Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?:

Questions - Part 4 - Delivering our spatial strategy

54 Do you agree with our proposed priorities for the delivery of the spatial strategy?

Do you agree with our proposed priorities for the delivery of the spatial strategy?:

If the primary aim of NPF4 is to ensure a plan-led system, monitoring needs to be introduced on a national level to assess whether this is being achieved - ie monitoring of whether developments are, or are not, complying with development plans. In addition, local planning authorities must be resourced properly both in terms of planning departments and supporting expertise, eg ecologists and environmental planners. Decision -makers will also require training, for example in assessing carbon emissions of developments.

55 Do you have any other comments on the delivery of the spatial strategy?

Do you have any other comments on the delivery of the spatial strategy?:

Questions - Part 5 - Annexes

56 Annex A. Do you agree that the development measures identified will contribute to each of the outcomes identified in section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

Do you agree that the development measures identified will contribute to each of the outcomes identified in section 3a(3)(c) of the Town and Country Planning (Scotland) Act 1997? :

The Policies do not provide strong enough detail and are not weighted sufficiently in favour of good development. Importantly there is little that convinces us that the wrong type of development will be prevented through these policies.

57 Annex B. Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?

Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?:

Our main concern is that the MATHLR process has been undertaken without reference to the climate crisis, meeting net zero targets and addressing the biodiversity crisis. The draft NPF4 appears to leave local authorities to somehow square the MATHLR with meeting climate targets.

The MATHLR figures have been calculated from household projections based on 2011 census data, which is now very out of date; the effects of Brexit and the Covid pandemic are not yet reflected in the economic and migration scenarios used. We understand that the MATHLR is only an estimate, but how and when will the figures be reviewed?

We also note that when a local authority raises its area's MATHLR the overall Scotland MATHLR also rises - there is no balancing decrease in the estimate of households made to the MATHLR elsewhere in the country. The MATHLR calculation methodology described in the supporting documents always rounds the housing figures upwards and does not take into account population declines. This means that where aspirational increases are proposed in one area, there are no balancing reductions in housing units required elsewhere in the country and the national figure continues to rise.

The large amount of land being allocated for housing and the generous 25 or 30% flexibility allowance added as a contingency introduces uncertainty for local authorities as to where best to target infrastructure investment, and as to whether it is possible to ensure that the right sites are developed in the right way to make 20 minute neighbourhoods a reality.

This raises a concern that the MATHLR methodology may be at odds with any planned route towards a zero carbon future. This concern is accentuated if the housing need the MATHLR represents is intended to be met by new-build homes on previously undeveloped land. The draft NPF4 does not make clear how refurbishment of vacant dwellings, re-using other buildings (eg in town centres) or short-term lets or second homes as primary dwellings could contribute to reducing the levels of housing need - and how this could be reflected in a local authority's MATHLR. The adjusted figures may well be accounted for in housing strategies, but how will this be reflected in the MATHLR or HLR numbers that then influence the amount of land that a local authority has to allocate for housing?

The MATHLR is an estimate of "all tenure" housing land supply; there is a further concern that this may not deliver efficiently on the affordable and specialist need housing that is really needed, as delivering the variety of homes required would be less profitable to build than volume market rate "executive" homes.

As the MATHLR indicates the amount of land that local authorities must allocate for a 10 year period, the resulting delivery programme must ensure that LAs are able to control the housing land pipeline over that period and ensure the policies prioritising brownfield sites and the redevelopment of existing buildings are prioritised rather than the pressure to meet housing targets meaning environmental policies are set aside. Both of these are important

priorities.

58 Annex C. Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?:

Many terms are used in the draft document which could helpfully be defined in the Glossary, eg Community Wealth Building, Ancient Woodland, significant emissions, nature based solutions, "delivered" housing land and Infrastructure.

A definition of Green Belt in the Glossary would certainly be helpful to clarify the difference between Green Belt, greenspace and greenfield sites. We suggest the following:

"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."

Questions - Integrated Impact Assessments

59 Environmental Report. What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? :

60 Environmental Report. What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.

What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.:

61 Environmental Report. What are your views on the potential health effects of the proposed national developments as set out in the environmental report?

What are your views on the potential health effects of the proposed national developments as set out in the environmental report?:

62 Environmental Report. What are your views on the assessment of alternatives as set out in the environmental report?

What are your views on the assessment of alternatives as set out in the environmental report?:

63 Environmental Report. What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?:

64 Society and Equalities Impact Assessment. What are your views on the evidence and information to inform the society and equalities impact assessment?

What are your views on the evidence and information to inform the society and equalities impact assessment?:

65 Society and Equalities Impact Assessment. Do you have any comments on the findings of the equalities impact assessment?

Do you have any comments on the findings of the equalities impact assessment?:

66 Society and Equalities Impact Assessment. Do you have any comments on the findings of the children's rights and wellbeing impact assessment?

Do you have any comments on the findings of the children's rights and wellbeing impact assessment?:

67 Society and Equalities Impact Assessment. Do you have any comments on the fairer Scotland duty and the draft NPF4?

Do you have any comments on the fairer Scotland duty and the draft NPF4?:

68 Society and Equalities Impact Assessment. Do you have any comments on the consideration of human rights and the draft NPF4?

Do you have any comments on the consideration of human rights and the draft NPF4?:

Do you have any comments on the consideration of human rights and the draft NPF4?:

69 Society and Equalities Impact Assessment. Do you have any comments on the islands impact assessment?

Do you have any comments on the islands impact assessment?:

70 Business and Regulatory Impact Assessment. Do you have any comments on the partial business and regulatory impact assessment?

Do you have any comments on the partial business and regulatory impact assessment? :

About you

What is your name?

Name:

John Mayhew

What is your email address?

Email:

john@aprs.scot

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?:

Slightly satisfied

Please enter comments here.:

It felt very odd to enter details of name and organisation at the end rather than the beginning.