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Local Government, Housing and Planning Committee

National Planning Framework 4



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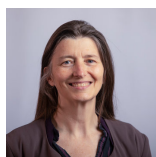
Local Government, Housing and Planning Committee

To consider and report on matters relating to local government, housing and planning falling within the responsibility of the Cabinet Secretary for Social Justice, Housing and Local Government and the Cabinet Secretary for Finance and the Economy, and matters relating to the Local Government Boundary Commission and local governance review and democratic renewal within the responsibility of the Deputy First Minister.



localgov.committee@parliament.scot

Committee Membership



Convener
Ariane Burgess
Scottish Green Party



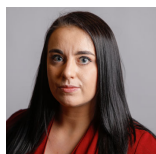
Deputy Convener
Willie Coffey
Scottish National Party



Miles Briggs
Scottish Conservative
and Unionist Party



Graeme Dey
Scottish National Party



Meghan Gallacher
Scottish Conservative
and Unionist Party



Mark Griffin
Scottish Labour



Paul McLennan
Scottish National Party

Executive Summary

1. The Committee welcomes NPF4 and its ambition for Scotland. To best deliver on these ambitions the Committee wishes to highlight a number of key areas to the Scottish Government. An overarching issue, however, is the capacity of the current planning system to deliver on the aims of NPF4.
2. Firstly, while recognising that it is for decision makers to make an informed judgement on a case by case basis, the Committee believes that greater clarity on priorities is required if the ambitions of NPF4 are to be delivered in a coherent and consistent way. What the Committee heard from stakeholders is that they do not feel they have sufficient clarity on what they should be prioritising in making decisions. The Committee urges the Scottish Government to consider again whether more could be done to provide decision makers with the clarity and certainty they are seeking.
3. The Committee also considers that more clarity and certainty is needed in the choice of language in some cases to support the delivery of the ambitions of NPF4. The Committee notes the explanations provided by the Scottish Government for its choice of language. NPF4 should be an accessible and usable document and it is of concern to the Committee that there is such uncertainty about the meaning of terms and words. These concerns are being highlighted to the Committee by people very familiar with the planning system. If these people are struggling to understand its meaning and intentions then it brings into question the extent to which people without that understanding and familiarity will be able to use it. The Committee would ask the Scottish Government to reflect on the comments made to this committee about the language used in NPF4 and consider how to create greater clarity and certainty.
4. The Committee wholeheartedly supports the prominence given to the climate emergency in NPF4. It is essential though that this prominence is reflected in planning decisions. This will require a significant change in approach for the planning system and we would welcome further reflection from the Scottish Government on how that change will be driven and how it will be balanced against competing priorities. The Committee would also welcome the Scottish Government's reflections on the concerns expressed by the Climate Change Committee and in particular, how it believes NPF4 will match ambition with action.
5. The Committee invites the Scottish Government to consider what more can be done to ensure that communities are supported to engage in shaping the places in which they live, particularly communities from more disadvantaged areas. The Committee would also ask the Scottish Government to consider what more can be done to alleviate consultation fatigue including ensuring that consultation is undertaken timeously and communities are involved in a collaborative rather consultative manner.
6. The Committee welcomes 20 minute neighbourhoods and notes that stakeholders recognise this as a good planning concept. There are undoubtedly, however, very significant challenges associated with delivering on 20 minute neighbourhoods. Whether it's a new development, an existing urban setting or rural or island context careful consideration will need to be given to how it can be applied in each context.

Communities will need to be involved in shaping the places in which they are to live and amongst other things, there will need to be a focus on infrastructure and sustainable transport to deliver on these ambitions. The Committee welcomes the Minister's recognition of the importance of STPR2 in delivering on 20 minute neighbourhoods, but would welcome further information from the Scottish Government on how it intends to deliver on 20 minute neighbourhoods across Scotland and in particular in rural and island areas where the challenges of creating 20 minute neighbourhoods would appear to be most pronounced.

7. The Committee hopes that NPF4 can make clearer what is expected of local authorities when considering applications for renewables, so that ambitions for renewables can be delivered across Scotland in an equitable and timeous manner. At the same time the Committee notes the reservations of Scottish renewables sector and asks the Scottish Government to reflect on them. The Committee also emphasises that any application must be considered carefully and a balance must be struck between our renewable energy ambitions and their impact on biodiversity.
8. The Committee welcomes the Minister's commitment to affecting an improvement in our town centres through NPF4 and other initiatives and will be paying close attention to how these progress. The Committee is keen to see how NPF4 and any other powers available can be deployed effectively in order to improve our town centres. The Committee explored the use of amenity notices in connection with this and considered whether they were an effective tool in delivering change, but no conclusion was reached on this.
9. The Committee would welcome the Scottish Government's view on how the issue of resourcing planning departments is addressed. The Committee welcomes the Minister's commitment to exploring how full cost recovery can be delivered. Having properly resourced planning departments will be essential to the success of NPF4. Given the current state of local authority planning departments it is debateable whether even with full cost recovery within the development management function they will have the resources to move toward the kind public led planning necessary to realise the ambitions of NPF4. In any event, it is key that any funding coming to local authorities from full cost recovery is retained by planning departments. It is also key that not only is there a very significant increase in the number of local authority planners but both current and new planners must be given the training and skills to work in this new environment.
10. We need to properly monitor and evaluate the effectiveness of NPF4 and how it is being delivered by local authorities. To that end, the Committee would welcome a commitment from the Scottish Government to producing an annual evaluation of NPF4 against the outcomes set out in Town and Country Planning (Scotland) Act 1997. The Committee would also welcome consideration of how benchmarking in local government could be used to ensure that the ambitions of NPF4 can be delivered.
11. The Committee highlights the concerns expressed to it about the lack of ambition inherent in MATLHR. While the Committee notes that these are merely minimums and not a cap it is concerned that having minimum targets may limit ambition at a time when we need to be ambitious to meet Scotland's housing needs. The Committee asks the Scottish Government to review HNDA at the earliest opportunity to develop a tool that is up to date and fit for all areas of Scotland, so that more appropriate projections can be made for local authority areas. The

Committee would also welcome further information on how that review will be conducted. The Committee also asks the Scottish Government to explain how it intends to ensure that MATHLR, Housing to 2040 and HNDA are better aligned to deliver on the ambitions for housing in Scotland.

12. Finally, given these issues, the Committee is concerned that it will not have sufficient opportunity to consider the final version of NPF4. It is conceivable that a final version will be materially different from the draft version. The Committee welcomes the Minister's commitment to appear before it on the final version of NPF4. At the same time, the Committee would welcome an assurance from the Scottish Government that sufficient time will be allowed for the Committee to undertake thorough scrutiny of the final NPF4 before Parliament is invited to approve it.

Introduction

13. The National Planning Framework 4 (NPF4) was introduced to the Scottish Parliament for scrutiny on 10 November 2021.
14. The National Planning Framework is the spatial expression of Scottish Government policy. It sets out how places and environments will be planned and designed in the years to come.
15. NPF4 was referred for consideration to the Local Government, Housing and Planning Committee.
16. In this report, the Committee offers its reflections on NPF4 and the capacity and suitability of the current planning system to meet the ambitions of NPF4. The Committee hopes that the Scottish Government gives careful consideration to its recommendations as it prepares the final version of NPF4 for laying before the Parliament.
17. In producing this report the Committee has worked closely with both internal and external partners.
18. The Committee would like to thank the Health, Social Care and Sport Committee, the Net-Zero, Energy and Transport Committee and the Rural Affairs, Islands and Natural Environment Committee for their contributions to the Parliament's scrutiny of NPF4. Their careful scrutiny of NPF4 from the perspectives of their committee remits has been immensely helpful to us and will hopefully help shape the final version of NPF4.
19. The Committee would also like to thank the stakeholders who enabled us to hear from different voices in the events and visits the Committee undertook to inform its scrutiny of NPF4. In particular, we'd like to thank Scotland's Regeneration Forum, Built Environment Forum Scotland, Rural Housing Scotland, Scottish Rural Action, Voluntary Health Scotland, Scotland's Towns Partnership and the Scottish Youth Parliament, all of whom provided invaluable input into our scrutiny.

The National Planning Framework

20. As noted earlier, the National Planning Framework is the spatial expression of Scottish Government policy. The Town and Country Planning (Scotland) Act 1997, as amended by the Planning etc. (Scotland) Act 2006 and the Planning (Scotland) Act 2019, provides the legislative framework for the National Planning Framework (NPF).
21. The Town and Country Planning (Scotland) Act 1997 is the basis for the planning system and sets out the roles of the Scottish Ministers and local authorities with regard to development plans, development management and enforcement.
22. The 1997 Act requires that a strategy for spatial developmentⁱ be created and should include a statement of what Scottish Ministers consider to be priorities for developmentⁱⁱ. It should also contain:
 - Targets for the use of land in different areas of Scotland for housingⁱⁱⁱ;
 - An assessment of how proposed national developments^{iv} and the strategy as a whole^v will impact on the achievement of greenhouse gas emission targets;
 - An indication of how national developments will meet housing needs^{vi}, improve health and wellbeing^{vii}, repopulate rural areas^{viii}, improve equality^{ix} and secure "positive effects for biodiversity"^x.
23. The strategy can also designate developments or classes of development as "national developments"^{xi}.
24. The draft NPF4 describes national developments as developments "that strongly support the delivery of the spatial strategy, i.e. are 'needed'."
25. The Planning (Scotland) Act 2019 also provided that the Scottish Planning Policy (SPP) would be incorporated into the NPF, meaning both the objectives and actions

i [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3)(a)

ii [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3)(b)

iii [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3)(d)

iv [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3)(e)

v [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(e)

vi [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(a)

vii [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(b)

viii [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(c)

ix [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(d)

x [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(f)

xi [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(4)(b)

to meet them would be in the same strategy document.

26. The draft NPF4 is broken down into a series of parts:

A National Spatial Strategy: The national spatial strategy guides decisions on future development across Scotland, which aim to produce:

- Sustainable places, which reduce emissions and restore biodiversity.
- Liveable places, where people can live better, healthier lives.
- Productive places, which produce a greener, fairer and more inclusive wellbeing economy.
- Distinctive places, where we recognise and work with local assets.

The National Spatial Strategy is underpinned by **six spatial principles** for Scotland in 2045 – compact growth, local living, balanced development, conserving and recycling assets, urban and rural synergy and a just transition. It also recognises the different challenges and opportunities across Scotland's regions, which are outlined in five geographic "action areas".

National Developments: There are 18 national developments, which support the delivery of the National Spatial Strategy, these range from significant infrastructure projects such as the development of urban mass/rapid transit systems in Aberdeen, Edinburgh, and Glasgow, to the continued expansion of the Central Scotland Green Network.

National Planning Policy: 35 national planning policies are set out, which will replace those currently found in the Scottish Planning Policy.

Minimum All-tenure Housing Land Requirements (MATHLR): This section sets out the minimum number of housing units that local, city-region and national park authorities must plan, as a minimum, to accommodate in future development plans. The Scottish Government has provided an explanatory report of how the MATHLR has been calculated.

National Planning Framework: Procedure

27. The procedure for submitting revisions of the NPF for scrutiny is provided for in the Town and Country Planning (Scotland) Act 1997^{xii} as amended by the Planning (Scotland) Act 2019^{xiii}.
28. The Scottish Parliament must approve a draft of the revised NPF before it can take effect. A draft cannot be laid for approval unless the Scottish Government has:
- Consulted in accordance with their participation statement;
 - Laid a copy of a draft of the revised framework in the Scottish Parliament;

xii [Town and Country Planning \(Scotland\) Act 1997](#), section 3CA

xiii [Planning \(Scotland\) Act 2019](#), section 2(13)

- Had regard to representations made to them on the copy of the draft within 120 days of laying this in the Scottish Parliament; and
- Laid an explanatory document in the Scottish Parliament which explains how the consultation on the copy of the draft was undertaken, a summary of the representations received as a result of consultation and how they have been considered in producing the draft laid for approval.
- These requirements are set out in the Town and Country Planning (Scotland) Act 1997 as amended by the Planning (Scotland) Act 2019.

Committee scrutiny

29. Recognising the cross-cutting nature of NPF4 the Committee proposed a collaborative approach to scrutiny and wrote to the following committees inviting them to participate in scrutiny of NPF4:
 - Net Zero, Energy and Transport Committee
 - Rural Affairs, Islands and Natural Environment Committee
 - Economy and Fair Work Committee
 - Health, Social Care and Sport Committee
 - Equalities, Human Rights and Civil Justice Committee
30. The Committee's collaborative approach aimed to maximise the effectiveness of scrutiny in the time available. There was a single Parliamentary call for views with individual subject committees then taking the lead on scrutinising the elements of NPF4 within their remits. Each Committee then wrote to relevant Cabinet Secretaries and to our committee with their findings. You can find letters from the other subject committees who considered NPF4 below:
 - [Health, Social Care and Sport Committee letter](#)
 - [Rural Affairs, Islands and Natural Environment Committee letter](#)
 - [Net Zero, Energy and Transport Committee letter](#)
31. The call for views ran from 17 November 2021 to 10 January 2022. You can read the responses [here](#).
32. The Committee agreed to hold five evidence sessions on NPF4, beginning with a session with Scottish Government officials and ending with a session with the Minister for Public Finance, Planning and Community Wealth ("the Minister"). In between the Committee held sessions focusing on the three separate elements of its remit—
 - 18 January 2022 – [Scottish Government Officials](#)
 - 25 January 2022 – [Planning](#)

- 1 February 2022 – [Housing](#)
 - 8 February 2022 – [Local Government](#)
 - 22 February – [Minister for Public Finance, Planning and Community Wealth](#)
33. The Committee would like to thank all those who provided it with written and oral evidence. Your contributions have been of great assistance to the Committee in its scrutiny of NPF4.
34. In addition to the formal evidence sessions the Committee undertook virtual visits to Celebrate Kilmarnock and a Smart Clachan and a physical visit to Govan. In addition, the Committee, along with other parliamentary committees, held an event with key stakeholders and a separate event with Members of the Scottish Youth Parliament. These were all incredibly informative and greatly assisted the Committee's scrutiny of NPF4. The Committee is very grateful to all those who participated in and facilitated these informal sessions and a full list of all those participated is included at the Annex to this report.

Development of the NPF4

35. Fiona Simpson, Chief Planner, Scottish Government, outlined the process followed by the Scottish Government for developing the draft framework in consultation with stakeholders:
- ” “We have taken a co-production approach from the early stages of the process. First, in early 2020, we ran an open call for ideas, which was followed by a fuller consultation on a position statement that we published later that year.”^{xiv}
36. Andy Kinnaird, Head of Transforming Planning, Scottish Government, provided^{xv} a detailed account of the various consultation and collaboration activities the Scottish Government ran and how these were adapted these when restrictions necessitated by the COVID-19 pandemic were instigated.
37. Some concerns have been expressed to the Committee about the time and opportunity afforded to stakeholders to consider the draft NPF4. Planning Democracy expressed concern about the opportunities for civic society to comment on the draft and noted that there had been more consultation on NPF3 prior to it being laid before the Parliament.^{xvi}
38. Pam Ewen of Heads of Planning Scotland also advocated a lengthier consultation period and highlighted the importance of thorough consultation:

^{xiv} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

^{xv} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

^{xvi} [Written submission from Planning Democracy to the Committee's call for views](#)

” Heads of Planning would rather an additional few months were added to the process in order to get it right now, than move forward with policies that may be ambiguous, as we said earlier. At the end of the day, that will save time and prevent appeals and court cases, which only go to slow investment and absorb resources, often unnecessarily. It is important to get NPF4 right and we have the opportunity to do that.^{xvii}

39. That being said, this was not by any means a universal perspective and other organisations welcomed the process around the development of NPF4. The Royal Town and Planning Institute (RTPI) Scotland for example described the process as "inclusive and wide-ranging".^{xviii}

Concurrent consultation

40. Although the Scottish Government did undertake consultation in the development of the draft NPF4, its formal consultation on the draft NPF4 document ran concurrently with the 120 days allotted for Scottish Parliament scrutiny in accordance with section 3CA(3) of the Town and Country Planning (Scotland) Act 1997. Concurrent consultation is a new process for this iteration of NPF. Ahead of laying the draft NPF4, the Scottish Government stated:

”In Autumn 2021, we will lay a draft NPF4 in the Scottish Parliament. At the same time we will carry out extensive public consultation. We anticipate producing a final version of NPF4 for approval and adoption around spring 2022.”^{xix}

41. Andy Kinnaird, Head of Transforming Planning, Scottish Government, provided the Committee with further clarity on the reasoning underpinning a concurrent consultation:

”We had been looking at the new statutory procedure for the NPF that was set out in the 2019 act. New section 3CA(3) of the Town and Country Planning (Scotland) Act 1997 groups together the requirement for ministers to consult in accordance with the participation statement and lay before the Scottish Parliament the draft that we are currently looking at and the need for them to have regard to all representations received within the period of no more than 120 days. We appreciate that there can be a bit of awkwardness around running the two at the same time, but we feel that that is how we needed to do it to make sure that our requirement to take into account all of the representations made within that 120-day period was fulfilled.”^{xx}

42. The Committee is concerned about the extent to which this concurrent scrutiny has undermined our capacity to undertake effective scrutiny of NPF4.
43. In order for the committees considering NPF4 to be able to report within the 120 day period and take the views of stakeholders into account, the Parliament's call for

^{xvii} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{xviii} [Written submission from RTPI Scotland to the Committee's call for views](#)

^{xix} Scottish Government transformingplanning.scot - [What is the National Performance Framework?](#) - Accessed 21 October 2021

^{xx} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022,

views was closed in early January. As a consequence, many of the consultation responses the Scottish Parliament received said that the content reflected initial thoughts on the document and a fully developed response would be sent to the Scottish Government consultation. This has hampered the Scottish Parliament's ability to consider the issues in full, as some stakeholders have been unable to present comprehensive assessments of the document.

44. Planning Democracy amongst others raised concerns about the effectiveness of a concurrent consultation process, suggesting that it would have been preferable for Parliament to be considering a version of NPF4 that had already been shaped by public consultation on a draft.^{xxi}
45. Moreover, stakeholders including RTPI Scotland and Scottish Environment Link noted the resource challenges of having to respond to two consultations on the same issue at a time when organisations are faced with significant resourcing challenges.^{xxii}
46. Having the consultations running concurrently sometimes created confusion leaving some stakeholders unclear of the value of responding to Parliament's consultation as well as the Government's.
47. The Net-Zero, Energy and Transport Committee also expressed concern about the consultation process:

” We do not think the laying process for NPF4 has been well run. It has led to some confusion and some respondents felt rushed to respond. We consider that the draft of NPF4 should only have been laid in the Parliament once the Scottish Government had substantively concluded its pre-laying consultation. The Scottish Government should reflect on this in relation to future drafts of the national planning framework. It should also consider whether it might be possible in future to provide the Parliament with more than the 120 days to scrutinise the draft that is the statutory minimum.^{xxiii}

48. The Committee notes these concerns.
49. The Minister stressed, however, all the different elements that informed the development of NPF4:

” I want to convey the point that, looking at everything in the round—the deliberations on the 2019 act that helped to shape NPF4, the preconsultation and the 120 days of public and parliamentary scrutiny, with a range of engagement activities taking place—I am very confident that we have had a strong and robust process of consultation and engagement, which is reflected in the excellent work that this and other parliamentary committees have undertaken on NPF4.^{xxiv}

^{xxi} [Planning Democracy written submission](#)

^{xxii} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{xxiii} Correspondence from the Net Zero, Energy and Transport Committee, 4 March 2022

^{xxiv} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

50. The Committee welcomes the Minister's comments and recognises the different strands of consultation and engagement that have informed the development of NPF4. At the same time the Committee considers that it may have been beneficial to scrutiny if Parliament had been presented with a draft NPF4 informed by consultation on a full draft of NPF4 as opposed to on a position statement.

51. The Committee recognises that the Scottish Government has carried out the consultation in accordance with the terms of the legislation as agreed by the Parliament last session. However, this is a new process to guide the consultation and scrutiny of a draft national planning framework. The Committee's experience, and that of stakeholders, suggests that now we have gone through the process there are ways in which it could be strengthened. This is something the Committee intends to revisit ahead of the next iteration of the NPF.

52. The Committee is also concerned that it will not have sufficient opportunity to consider the final version of NPF4. It is conceivable that a final version will be materially different from the draft version. The Minister gave an undertaking to the Committee that he would be willing to give evidence to the Committee on the final version before it is approved.^{xxv}

” I am happy to appear before the committee at any time to discuss NPF4. The consultation closes on 31 March, and I appreciate that parliamentary scrutiny of the draft will wrap up in the next couple of weeks. There will be a window of opportunity for further discussion before a final vote.^{xxvi}

53. While the Minister's commitment to appear before the Committee is to be welcomed it remains unclear what the extent of the "window of opportunity" for scrutiny of NPF4 will be.

54. The Committee welcomes the Minister's commitment to appear before it on the final version of NPF4. At the same time, the Committee would welcome an assurance from the Scottish Government that sufficient time will be allowed for the Committee to undertake thorough scrutiny of the final NPF4 before Parliament is invited to approve it.

55. In that regard the Committee has also written to the Parliamentary Bureau inviting it to ensure that sufficient parliamentary time is afforded for scrutiny of this final version once it has been laid.

56. The Committee asks the Bureau to confirm that it will endeavour to secure sufficient parliamentary time for proper scrutiny of the final version of NPF4.

^{xxv} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{xxvi} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

The Fourth National Planning Framework

57. In this section of the report the Committee considers the overall principles of NPF4, how these underpin the framework and if the content of the framework will deliver the intended transformative change.

A National Spatial Strategy for Scotland 2045 and spatial principles

58. The national spatial strategy guides decisions on future development across Scotland and aims to produce:
- Sustainable places, which reduce emissions and restore biodiversity.
 - Liveable places, where people can live better, healthier lives.
 - Productive places, which produce a greener, fairer and more inclusive wellbeing economy.
 - Distinctive places, where we recognise and work with local assets.
59. The National Spatial Strategy is underpinned by **six spatial principles** for Scotland in 2045 – compact growth, local living, balanced development, conserving and recycling assets, urban and rural synergy and a just transition. It also recognises the different challenges and opportunities across Scotland's regions, which are outlined in five geographic "action areas".


Overarching priorities and six spatial principles

60. Stakeholders were broadly supportive of the four overarching policy priorities and six spatial principle set out in the strategy.
61. For example, RSPB Scotland expressed its support, in particular welcoming the commitment to secure positive effects for biodiversity, creating and strengthening nature networks and investing in nature-based solutions.^{xxvii}
62. Scottish Community Development Centre highlighted the significance of the recognition given to sustainable places as did Woodland Trust Scotland.^{xxviii}
63. A number of stakeholders, however, told the Committee that there are gaps in the policy priorities and spacial principles. For those stakeholders the principles and priorities do not address some key issues and as a result they questioned the capacity of NPF4 in its current form to deliver transformative change.
64. The Health and Sport Committee felt the priorities and principles needed to take greater account of health and wellbeing, noting the significant impacts planning policy and the design of neighbourhoods can have on health and wellbeing, both positive and negative.^{xxix}

^{xxvii} [RSPB Scotland written submission](#)

^{xxviii} [Scottish Community Development Centre written submission](#)

^{xxix} Correspondence from the Health and Sport Committee, 24 February 2022

65. The Committee notes that policy 14 emphasises the need to create vibrant, healthier and safe places to tackle health inequalities particularly in places which are experiencing the greatest disadvantage. However, like the Health, Social Care and Sport Committee we have heard from stakeholders that greater emphasis needs to be placed on health and wellbeing in NPF4.^{xxx}
66. At the Committee's stakeholder event, members heard about the importance of health and wellbeing being at the forefront of planning decisions. Participants highlighted amongst other things that planning decisions can precipitate obesogenic food environments. They also noted that planning decisions had also contributed to a higher prevalence of unhealthy food in more deprived areas.
67. Other stakeholders including the SURF - Scotland's Regeneration Forum felt that the overarching policy priorities do not give sufficient prominence to the potential for NPF4 to address poverty and inequality. In particular, the SURF expressed concern that higher capacity community groups in more affluent places are better equipped to engage with the planning system, and to achieve local aspirations more generally, than those in deprived places and as a consequence there is the potential for NPF4 to exacerbate, rather than narrow, existing inequalities between places.^{xxxi}
68. These sentiments were echoed by the Scottish Community Development Centre in its written submission to the Committee. It contended that the principles should be strengthened in terms of community participation and influence in planning, including support for those who are less able to take part.^{xxxii}
69. Concerns were also expressed to the Committee about the extent to which the overarching priorities and principles take sufficient account of the challenges faced by rural communities.
70. The Rural Affairs, Islands and Natural Environment Committee captured these concerns in its letter, questioning the extent to which these overarching principles recognised the challenges faced in rural communities and the extent to which they provided a vision for rural areas.
71. These concerns were also shared with the Committee during its stakeholder event in which some participants felt that these principles did not do enough to set out a long term vision for rural areas.
72. The Minister, however, stressed to the Committee that the framework needs to be read in a holistic way:
-  ...we have to see this in the round. With 35 policies, 18 national developments and six spatial principles, the framework has to be read in a holistic way; there is, so to speak, no one policy that you can fully understand without relating it to all the other policies.^{xxxiii}

xxx Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 85

xxxi [SURF written submission](#)

xxxii [Scottish Community Development Centre written submission](#)

xxxiii Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

73. The Committee therefore welcomes the existing overarching priorities and principles. The Committee also welcomes the Minister's comments on this issue and recognises that the framework needs to be read holistically. At the same time the Committee asks the Scottish Government to consider how the priorities and principles could be built upon to more clearly emphasise the contribution NPF4 needs to make to addressing inequalities, health and wellbeing and the needs of rural and island areas.
74. If NPF4 is going to deliver transformative change then it needs to be a plan, which addresses the needs of all of Scotland's places and people and has clear outcomes and goals.

Using the principles in practice

75. To be effective, NPF4 must be informed and driven by the overarching priorities and principles. Stakeholders have, however, suggested to the Committee that the policy priorities and spatial principles are not clearly carried through from the national spatial strategy to other sections of draft NPF4 or wider Scottish Government action.
76. For example, Planning Democracy asked how in applying the policy priorities and spatial principles compact growth and 20-minute neighbourhoods were compatible with dualling of the A9 and A96 trunk roads.^{xxxiv}
77. RTPI Scotland also raised concerns about the application of the policy priorities and spatial principles:

” Whilst RTPI Scotland supports the aspirations of the spatial principles section we are concerned that not enough clarity has been provided as to the status of the section, especially how it may be considered in the development management and development planning process or of how it can be read across the other sections of the Framework. For example, spatial principle a) on compact growth does not significantly feature in part 3 and is not mentioned at all under policy 30 on Vacant and derelict land and empty buildings. Other spatial principles such as the ‘balanced development’ principle, although we imagine is implicit throughout the Framework, has not been explicitly included anywhere else in the document and could form an important policy basis for development management decisions. RTPI Scotland welcomes the inclusion of the Infrastructure First principle within the Framework and would support its inclusion in this section.^{xxxv}

78. This concern was also expressed by the Net Zero, Energy and Transport Committee which highlighted concerns it had heard about a lack of internal consistency within NPF4.
79. Barbara Cummins of Planning Aid Scotland suggested to the Committee that perhaps part of the problem with consistency is that the document is not meant to be read in a linear way and rather needs to be considered in its entirety. To that

xxxiv Written submission from Planning Democracy

xxxv Written submission from RTPI Scotland

end, she suggested that the Scottish Government should be investing in digital tools to improve accessibility and enable users to cross-refer to related policies that need to be taken into account together.^{xxxvi}

80. Heads of Planning Scotland suggested NPF4's accessibility could be improved by mapping:

” ...disappointing that the document is presented as a static PDF which makes it difficult to extract data from and it limits the scope of the mapping. The mapping throughout is poor and there is a general lack of diagrams and explanatory boxes.^{xxxvii}

81. For the ambitions of NPF4 to be delivered it is essential that the policy priorities and spatial principles are applied consistently throughout the document. Later in this report the Committee considers the relationship between NPF4 and other Scottish Government policy documents and how they must be aligned. As a starting point, however, it is necessary for NPF4 to be internally consistent.
82. The Committee recognises that the framework is to be read holistically rather linearly. With that in mind, the Committee invites the Scottish Government to consider how digital tools might improve the accessibility of NPF4 and understanding of the interrelationship between different parts of the document.
83. The Committee also notes the evidence advocating the inclusion of mapping in NPF4 to gain a better understanding of how Scotland's land is being used. The Committee appreciates that at this late juncture it would not be possible to include mapping in NPF4, but invites the Scottish Government to consider how it could include such information in future iterations of NPF.

Hierarchy of principles and priorities

84. Several witnesses asked for clarity on how developers and decision makers should balance or prioritise the four priorities set out in the national spatial strategy, the six spatial principles, the development priorities set out in the five action areas and individual national planning policies.
85. Christina Granger of the Royal Incorporation of Architects in Scotland argued in oral evidence that:
- ” ...the document covers a huge amount of ground, and because not everything can sit in one place, we need a hierarchy...there needs to be some sort of primacy amongst these policies to help people understand where the priorities themselves lie.^{xxxviii}
86. Scottish Environment Link also stressed the importance of a hierarchy:

^{xxxvi} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{xxxvii} [Written submission from Heads of Planning Scotland](#)

^{xxxviii} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

” In order to achieve the wider goals of Housing to 2040 and NPF4, including community wealth building, meeting targets for diverse housing needs and meeting climate and biodiversity ambitions, planning policy needs to find the most effective means of delivering housing efficiently in terms of land use and resource use. Policy hierarchy needs to be clear about the primacy of universal policies and particularly the significant weight given to the climate emergency with respect to housing developments.^{xxxix}

87. In evidence to the Committee the Chief Planner agreed to revisit this issue, but at the same time stressed that each decision is unique and decision makers must consider what value to give to priorities in each instance.^{xi}
88. Following that evidence session the Committee wrote to the Minister asking him to reflect again on the value of having a clearer hierarchy to inform decision making. In responding the Minister stressed that NPF4 is a package to be read as a whole. He noted that legally it is for the decision maker to determine what weight to give relevant parts of the development plan on a case by case basis, but at the same time he advocated that all plans and decisions should give significant weight to the global climate emergency.^{xli}
89. The Committee is grateful to the Minister for his further reflections on this issue.

90. While recognising that it is for decision makers to make an informed judgement on a case by case basis, the Committee believes that greater clarity on priorities is required if the ambitions of NPF4 are to be delivered in a coherent and consistent way. What the Committee heard from stakeholders is that they do not feel they have sufficient clarity on what they should be prioritising in making decisions. The Committee urges the Scottish Government to consider again whether more could be done to provide decision makers with the clarity and certainty they are seeking.

Clarity of concepts and language

91. NPF4 is a long-term strategy and for decision makers to be able to use it effectively and deliver on its ambitions, there must be clarity. Stakeholders suggested to the Committee that the meaning of some of the concepts and language used in NPF4 could be clearer.
92. Specifically, the Committee heard concerns that certain concepts, such as “community wealth building” and “20 minute neighbourhoods” were not sufficiently well defined.
93. Planning Aid for Scotland called for greater certainty in the definition of these concepts:

^{xxxix} Written submission from Scottish Environment Link

^{xi} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{xli} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

” “...policies in draft NPF4 cover new themes, such as 20-minute neighbourhoods and community wealth building. These policies must be written to allow practical application by public and private sector planners. Further refinement and additional text may need be needed in this regard.”^{xlii}

94. Nicola Barclay of Homes for Scotland also expressed concern about the lack of definition of these concepts. In so doing, she noted that the glossary does not contain a definition of what community wealth building means, requiring people to have to make an assumption about its meaning. She highlighted that in the absence of this kind of definition not only do applicants not necessarily understand fully what that term means, but planning officers have to use their own judgement to work out its meaning.^{xliii}

95. Tony Cain of the Association of Local Authority Chief Housing Officers also expressed reservations about the clarity of some of the concepts in NPF4:

” I also think that there are points at which some of the conceptual approaches are confused. The one that really jumped out for me was on page 15, which talks about affordable homes being provided to “offset the impact of second home ownership and short term lets”. I do not think that that is why we are providing affordable homes in rural areas, and there is something deeply problematic about simply giving up on the impact that second homes and short-term lets have. We are investing £200,000 per home to make up for the fact that the market is driving properties away from availability to local communities. There is some woolly thinking in the document and one or two key areas where the language is not properly defined or developed.”^{xliv}

96. Dr Caroline Brown stressed to the Committee why this clarity is so important:

” From my perspective, some elements of NPF4 are welcome, but they need to be fleshed out in order to provide clarity. That is important because, in a discretionary system in which planning officers, developers and others are talking about what should and should not happen in the future, any doubt about terminology that is not crystal clear allows developers to push against requirements and diminish what they deliver, particularly in a system that is struggling for resources.”^{xlv}

97. Professor Sparks pointed the Committee to a recent example in Stirling where an out-of-town development was given planning permission, despite council officers' recommendation that the development should be rejected. He noted that the framework's glossary does not define out-of-town locations, so that provides wriggle room and expressed concern that developments will continue to be approved despite the policies set out in NPF4.^{xlvi}

98. Robbie Calvert of RTPi Scotland highlighted the legal ramifications of the absence of such certainty:

^{xlii} [Planning Aid Scotland written submission](#)

^{xliii} Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

^{xliv} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{xlv} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{xlvi} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

” Planners will have to defend those policies at appeal. Although we appreciate there are complexities inherent in planning, it is still necessary to give clear consideration to and stress test some of the policies in the framework, and provide decision makers with as much certainty and clarity as possible. I appreciate the point that the Scottish Government made about being too descriptive in the use of definitions, but we still feel that there is an opportunity to provide further guidance and detail on a number of policies.^{xlvii}

99. Reflecting specifically on 20 minute neighbourhoods, the Minister suggested to the Committee that there was flexibility in the concept of 20 minute neighbourhoods to apply it in different ways to suit different contexts.^{xlviii}

100. The Committee recognises a need for flexibility to some extent, but is not convinced that as it currently stands NPF4 strikes the right balance. The Committee will return later in this report to look at some of these concepts, but in more general terms the Committee asks the Scottish Government to look again at terms such as "community wealth building" and "20 minute neighbourhoods" to consider whether these are sufficiently well defined. In the absence of that clarity there is a risk that NPF4 does not deliver on its ambitions and that planning decisions are made which run contrary to the ambitions of NPF4.

101. Several witnesses, including the RTPI Scotland and the Law Society of Scotland, also raised concerns about a lack of clarity and certainty for decision makers in the wording of some policies, examples given include the use of words such as "should" or "supported" rather than "must" or "approved".

102. Robbie Calvert of RTPI Scotland highlighted an example to the Committee:

” Regarding net zero ambitions, in policy 19, on green energy, for example, planners are to support development proposals unless the impacts are considered unacceptable. The word "unacceptable" is not defined within the framework, and that could lead to a lot of challenges at appeal and public inquiry.^{xlix}

103. The Law Society of Scotland highlight concerns in relation to policies 5 to 35 of the National Planning Policies, suggesting that the use of the word "should" offers insufficient clarity on whether or not the policy in fact must be complied with.¹

104. SURF expressed similar concerns in its written submission:

^{xlvii} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{xlviii} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{xlix} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

¹ [Law Society of Scotland written submission](#)

” One recurring point concerned the general language in the draft document, which uses words like “should” instead of “will”, to suggest actions that are being encouraged rather than required. In the experience of many in the SURF network, “soft” strategies that argue for change are much less effective than “hard” strategies that place clear and robust responsibilities on institutions and organisations. If NPF4 is to make a serious effort to progress its ambitious thematic goals, the language could be revised to provide clarity on duties that must be followed.^{li}

105. Pam Ewen of Heads of Planning Scotland also highlighted specific examples of words and terms she felt needed to be defined:

” ...there are lots of words—I will not go through them all—that need to be defined. What are “good, green jobs”? What is “high quality”? What are “great places”?^{lii}

106. The Minister in evidence to the Committee suggested that while the Scottish Government would reflect on these concerns, often the terminology being used had particular meanings in planning legislation.^{liii}

107. With reference to the issue of the choice of “should” rather than “must” Andy Kinnaird, Head of Transforming Planning at the Scottish Government, explained the Scottish Government’s approach:

” On the use of language and whether we should say “must” or “should”, we followed a convention across the draft to use the term “must” only in relation to statutory requirements and to use “should” where something is more a matter of policy or practice. That should not be read as meaning that “should” is a weaker message— there is still an expectation that it should be done.^{liv}

108. The Committee notes the explanations provided by the Scottish Government for its choice of language. NPF4 should be an accessible and usable document and it is of concern to the Committee that there is such uncertainty about the meaning of terms and words. These concerns are being highlighted to the Committee by people very familiar with the planning system. If these people are struggling to understand its meaning and intentions then it brings into question the extent to which people without that understanding and familiarity will be able to use it. The Committee would ask the Scottish Government to reflect on the comments made to this committee about the language used in NPF4 and consider how to create greater clarity and certainty.

^{li} [SURF - Scotland's Regeneration Forum written submission](#)

^{lii} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{liii} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{liv} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

Action Areas for Scotland 2045

109. The draft NPF4 sets out five action areas. In the draft NPF4 it explains the purpose of these areas:
- ” Each part of Scotland can make a unique contribution to building a better future. Our shared spatial strategy will be taken forward in five action areas. Each area can support all spatial principles, and the following section sets out priorities for each of the action area.
110. The five action areas are:
- North and West Coastal Innovation
 - Northern Revitalisation
 - North East Transition
 - Southern Sustainability
 - Central Urban Transformation
111. During the time available to Committee to scrutinise the draft NPF4 it has not focussed its attention on these action areas. However, the Committee encourages the Scottish Government to give careful consideration to the issues highlighted on the action areas by the Rural Affairs, Islands and Natural Environment Committee and Net Zero, Energy and Transport Committee

National Developments

112. Part 2 of the draft NPF4 lists 18 “national developments”: significant developments of national importance that will help to deliver the spatial strategy.
113. Fiona Simpson, Chief Planner, Scottish Government, provided the Committee with a detailed account of how the National Developments in the plan had been selected and referred to the report the Scottish Government produced on the integrated impact assessment. She explained that the work done to develop the spatial strategy had influenced the selection of national developments and said:
- ”The proposed national developments in the draft are those that we think will help to deliver the spatial strategy to a degree that is more than just locally and regionally significant.”^{lv}
114. Scottish Environment Link welcomed the national developments, but was unsure how they would be delivered in the absence of a delivery plan.^{lvi}
115. The Royal Institute of Chartered Surveyors also welcomed the national developments, but questioned how they fitted with the rest of the framework:

^{lv} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022
^{lvi} [Written submission from Scottish Environment Link](#)

” While the list of National Developments provides a helpful summary of worthy projects across Scotland, it is not clear how they fit within the context of the document as a whole. It is not clear how this section is supposed to be used as part of the ‘planning framework’ or whether they are examples that should be emulated where possible. It is also not clear how they represent the forward-looking future of Scotland, given they are projects that are already underway.^{lvii}

116. Planning Democracy suggested that the National Developments could have been developed in a more collaborative way through the use of Citizens Assemblies.^{lviii}
117. In its letter to this Committee the Health, Social Care and Sport Committee questioned whether sufficient consideration had been given to the health and wellbeing impact of the national developments.
118. The Net Zero Energy and Transport Committee also raised concerns about the National Developments. In particular it highlighted the concerns from stakeholders that it is not always clear what benefit arises from something being listed as a National Development, and that some developments listed in this draft have been carried forward from NPF3 without much evident progress.
119. It is worth noting that the previous Local Government and Regeneration Committee made the following recommendation in its report on draft NPF3 on how parliamentary oversight of, and public engagement in, the process for choosing national developments could be improved:

” We recommend the Government refine its approach to the development of the successor to NPF3 by beginning with a parliamentary process to consider and debate the types of national developments Scotland will need in the period beyond NPF3. This will provide clarity on the strategy and criteria upon which national developments will be selected by the Government, and allow for an assessment of how effective the national developments set out in the current NPF have been [as per our recommendation at paragraph 55]. It will also ensure the Parliament has the opportunity to consider how such developments support and deliver other key policy areas such as sustainable development, climate change targets and economic growth etc.^{lix}

120. During the time available to the Committee to scrutinise NPF4, the National Developments have not been an area that the Committee has chosen to focus on. However, the Committee would ask the Scottish Government to reflect on the recommendations of its predecessor committee and to offer further clarity on how the National Developments relate to the rest of the framework.

^{lvii} Written submission from the Royal Institute of Chartered Surveyors

^{lviii} Written submission from Planning Democracy

^{lix} 3rd Report of the Local Government and Regeneration Committee 2014, Proposed National Planning Framework 3 and review of Scottish Planning Policy

National Planning Policy Handbook

121. Part 3 of NPF4 sets out policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents.
122. The Committee's scrutiny has focused on thematic consideration of the policies rather than looking at each of the 35 policies in detail. The Committee has, however, received useful information from many stakeholders relating to individual policies and the Committee would urge the Scottish Government to consider those submissions in developing the final version of NPF4.

Sustainable Places

123. Policies 1 to 6 all fall under the heading of sustainable places. Fiona Simpson, Chief Planner, Scottish Government, explained the overarching purpose of these priorities:

”Policies 1 to 6 are the universal policies and are largely new. They cover key principles to do with the importance of a plan-led system, the climate emergency, the nature crisis, human rights, equality and discrimination—addressing which is now a statutory outcome for the NPF—and community wealth building, which is a key theme that we want to cut across decisions. We updated our policy on good quality design.”^{ix}

Policy 1: Plan-led approach to sustainable development

124. Policy 1 states:

”All local development plans should manage the use and development of land in the long term public interest. This means that new local development plans should seek to achieve Scotland’s national outcomes (within the meaning of Part 1 of the Community Empowerment (Scotland) Act 2015) and the UN Sustainable Development Goals.”^{ixi} ^{lxii}

125. Policy 1 of the National Planning Policy emphasises that Scotland operates a plan-led system. Moreover, the Chief Planner in evidence to the Committee noted the importance of the plan led approach to the delivery of key Scottish Government policy goals, such as tackling the climate and nature emergencies.
126. Witnesses including Professor Cliff Hague and the Scottish Land Commission, however, argued that the planning system in Scotland is currently developer led rather than plan-led, with planning effectively a means of managing private development. They contended that there are considerable limits on the ability of the Scottish Government and local authorities to deliver their policy objectives in such a planning environment. They argued that a more pro-active role for the public sector in land assembly and development, as happens in countries such as Germany and

^{ix} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

^{ixi} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 68

^{lxii} [UN Sustainable Development Goals](#) - accessed 9 December 2021

The Netherlands, should be adopted.

127. Tony Cain of the Association of Local Authority Chief Housing Officers was sceptical about the prospect of NPF4 being able to precipitate a move toward a plan-led system:

” The ambition for a plan-led approach is absolutely right but we are a long way away from where we were 40 or 50 years ago, when local authorities and public agencies were definitely drivers of development and delivery within the planning system. They are not that now. They are not resourced to do that, and they are not necessarily skilled to do it either. The delivery process is now largely led by the private sector, so if we want to change the way in which the process is led, we need to re-equip local authorities, in particular, and give them the confidence that they can take decisions locally and that those decisions will stick. I do not think that that is where the sector is at the moment; it is not currently in control of what gets built. The process is essentially passive. A plan will be approved and then councils will, for the most part, wait and see what appears in the planning inbox. Nothing in the NPF will change that.^{lxiii}

128. Heads of Planning Scotland in its written evidence welcomed the ambitions of this policy, but had some reservations about its deliverability within the current planning environment:

” All the sentiments expressed here are laudable, but its success will rely heavily on culture change across the board, co-design and partnership working and clarity. Fundamentally it will require a rethink on how we develop places, and it will require a significant change in the design approaches by developers to be successful.^{lxiv}

129. In the course of its visit to Govan the Committee also heard about the ambitions there for a public-led planning system. The Committee was very impressed by what it heard and recognised the efforts of local authority planners there to give effect to such a system. Nonetheless, the Committee was still left with a sense that there are significant resource and culture barriers in the way of such a system.

130. Clare Symonds of Planning Democracy Scotland stressed that it is not only about a culture change, but that for communities to have confidence in a plan-led system, decisions must be made in accordance with that plan. She argued that where decisions are made that run contrary to development plan policies, communities should have the right to appeal, usually known as “community” or “third party” right of appeal, and asked for it to be included in the planning legislation.^{lxv}

131. The Committee explored with the Minister whether NPF4 could drive a public plan-led system, in which local authorities would have considerably more agency to shape their local communities and to manage land use more proactively. The Minister argued that NPF4 combined with other Scottish Government initiatives is creating the environment for a public-led planning system:

^{lxiii} Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

^{lxiv} [Written submission from Heads of Planning Scotland](#)

^{lxv} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

” I believe that NPF4 supports that. We may come on to discuss later in the meeting the question of how prescriptive or flexible certain policy language should be and the need for that flexibility so that local authorities can apply the policy to their circumstances. As well as our approach to planning policy, we will be undertaking additional work during this parliamentary session on land assembly, compulsory purchase and compulsory sales orders. There are also provisions in the infrastructure levy in the Planning (Scotland) Act 2019. We will consider those as part of a broader review of planning obligations. We are undertaking a range of activity beyond what we are doing with NPF4 that can help to support those ambitions.^{lxvi}

132. The Committee considers that for NPF4 to be successful it needs to be founded on a public-led planning system. The Committee welcomes the Minister's comments on encouraging a public-led planning system and asks the Scottish Government to reflect further on how this planning approach can be further developed and embedded. The Committee has heard concerns about the ability of planning departments, in terms of resources and culture, to embrace a public-led planning system and asks the Scottish Government to reflect on these concerns and set out what action it would intend to take to respond to these concerns.
133. In placing this emphasis on a public-led planning system, the Committee is not in any way seeking to undervalue the importance of private developers to delivering on the ambitions of NPF4 and recognises the key contribution they have to make.
134. The Committee considers there might be lessons to be learned from other planning systems and intends to look at other such systems in the near future.

Policy 2: Climate emergency

135. Policy 2(a) states that:

” ”a) When considering all development proposals significant weight should be given to the Global Climate Emergency.”^{lxvii}

136. In evidence to the Committee the Minister explained policy 2 is:

” ...at the heart of NPF4. We recognise that the planning system must do all that it can to support us in our journey to net zero...”^{lxviii}

137. At the Committee's stakeholder event there was enthusiasm for the prominence given to the climate emergency, but that enthusiasm was tempered by scepticism about the extent to which it will in reality inform planning decisions.

^{lxvi} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{lxvii} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 69

^{lxviii} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

138. Galloway and Southern Ayrshire Unesco Biosphere stressed the importance of considering nature and biodiversity alongside net zero and the importance of ensuring consequences of off-setting any emissions also result in nature-based solutions that enhance biodiversity.^{lxix}

139. Clare Symonds of Planning Democracy welcomed the prominence given to the climate emergency, but highlighted the challenges that might present:

” Going from having a narrow focus on delivering the Government’s economic strategy to including priorities on planet and nature is great, but changing the default orientation of the system that has long seen development as an intrinsically good thing will take some doing. The training and resourcing for that is crucial.^{lxx}

140. WWF Scotland also welcomed the prominence given to the climate emergency, but like Planning Democracy expressed concern about how the planning system will change its character and did not feel that NPF4 offered sufficient clarity on how that change in approach will be effected.^{lxxi}

141. RSPB Scotland queried how the requirement to facilitate biodiversity enhancement will be demonstrated and enforced:

” We particularly welcome the commitment to “secure positive effects for biodiversity, creating and strengthening nature networks and investing in nature-based solutions”. The success of such an approach will be measured by how it is implemented, therefore the NPF must include mechanisms to deliver on these aims.^{lxxii}

142. Concerns about action to match ambition were emphasised by the conclusions of the Climate Change Committee's recent report to the Scottish Parliament:

” "The report shows that, whilst Scotland’s vision for a well-adapted nation is welcome, more needs to be done to translate ambition into actions that are commensurate with the scale of the challenge."^{lxxiii}

143. The Committee wholeheartedly supports the prominence given to the climate emergency in NPF4. It is essential though that this prominence is reflected in planning decisions. This will require a significant change in approach for the planning system and we would welcome further reflection from the Scottish Government on how that change will be driven and how it will be balanced against competing priorities. The Committee would also welcome the Scottish Government's reflections on the concerns expressed by the Climate Change Committee and in particular, how it believes NPF4 will match ambition with action.

lxix Written submission from Galloway and Southern Ayrshire Unesco Biosphere

lxx Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

lxxi [Written submission from WWF Scotland](#)

lxxii [Written submission from RSPB Scotland](#)

lxxiii [Climate Change Committee: 2022 Report to the Scottish Parliament](#)

Policy 4: Human rights and equality

144. Policy 4, paragraph (b) notes that:

"b) Planning authorities, applicants, key agencies and communities have a responsibility to consult and engage others collaboratively, meaningfully and proportionately. Throughout the planning system, opportunities are available for everyone to engage in local development planning and the development decisions which affect them. Such engagement, undertaken in line with statutory requirements, should be early, collaborative, meaningful and proportionate. Support or concern expressed on matters material to planning should be given careful consideration in developing and in considering development proposals."^{lxxiv}

145. The Scottish Community Development Centre in its written submission to the Committee stressed the importance of ensuring that more disadvantaged groups are able to engage and shape their communities:

” Although, community activism around climate change is already strong in Scotland, communities not already engaged, who are often the most affected by climate change and actions to prevent it, require support to contribute to planning and take positive action. This is especially true in our disadvantaged communities where there are fewer resources and existing organisation is thinner on the ground. There should be a recognition of the need for support and proactive engagement with marginalised and disadvantaged communities. If community climate hubs are to contribute to planning for sustainable places, they need to be community-led, with support to represent diversity and involve wider, more marginalised groups. They also need to be given adequate power to control, utilise and protect local resources.^{lxxv}

146. This sentiment was echoed by participants in the Committee's stakeholder event where it was suggested that groups who are well informed and funded can more easily participate in consultation and participatory budgeting activities.

147. At the same event participants highlighted though that across communities there is a sense of consultation fatigue. It was suggested that this was driven in part driven by communities having long waits to see the results of their contributions and in part because communities were consulted in the sense of being given options to choose from rather than involved in developing those options in collaboration with developers and public authorities.

148. The Committee invites the Scottish Government to consider what more can be done to ensure that communities are supported to engage in shaping the places in which they live, particularly communities from more disadvantaged areas. The Committee would also ask the Scottish Government to consider what more can be done to alleviate consultation fatigue including ensuring that consultation is undertaken timeously and communities are involved in a collaborative rather consultative manner.

^{lxxiv} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 70

^{lxxv} Scottish Community Development Centre written submission

149. Some witnesses argued that draft NPF4 paid insufficient attention to equalities. In response to a question about the needs of children, women, older people and disabled people, Dr Caroline Brown stated:

” “There are many promising things in the draft NPF. However, one of the things that is missing is any mention of those specific groups and their needs... pointers about how those groups are disadvantaged and about the inequalities that they face can help us to work out what we have to do. The NPF does not mention those groups. It talks about equalities but, if we do not know what the inequalities are, we cannot fix them. We need to say what those inequalities are.”^{lxxvi}

150. In his appearance before the Committee the Minister recognised this omission and committed to revisiting it for the purposes of the final version of NPF4:

” I recently had an excellent and informative discussion with Engender, and we will reflect on that before we put forward the final draft of NPF4. The framework has to be for everyone. Notwithstanding our obligations under the equalities legislation and the obligations placed on NPF4 by the 2019 planning act and by policy 4, it is important that we always recognise that a person’s definition of “accessible” or “safe” or of what might constitute a 20-minute neighbourhood will be predicated on their own personal circumstances. Planning professionals recognise that instinctively when they apply the principles, and I am conscious of the ask to make that more explicit within NPF4. I gave an undertaking to Engender—and I give an undertaking to the committee—to do that as we move towards the final draft.”^{lxxvii}

151. The Committee welcomes the Minister's commitment to making explicit provision about the needs of children, women, older people and disabled people in the final version of NPF4. The Committee will be applying careful scrutiny to the final version of NPF4 to ensure that this has been properly addressed.

Liveable Places

152. Fiona Simpson, Chief Planner, Scottish Government, explained to the Committee the purpose of policies 6 to 15:

” “In policies 6 to 15, some of the newer policies are to do with 20-minute neighbourhoods, an infrastructure-first approach, play and health. They flow from much of the debate on the Planning (Scotland) Bill, the statutory requirements and the emphasis on local liveability, which will be important in the future, in the context of net zero.”^{lxxviii}

^{lxxvi} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{lxxvii} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{lxxviii} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

20 Minute Neighbourhoods

153. Key to the idea of liveable places is the concept of 20 minute neighbourhoods. The draft NPF4 states that:
- ” 20 Minute Neighbourhoods are a method of achieving connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle (within approx. 800m) of their home.”^{lxxix}
154. The framework states " The principle can be adjusted to include varying geographical scales from cities and urban environments, to rural and island communities.”^{lxxx}
155. Moreover it notes that:
- ” The application of the 20 Minute Neighbourhood will vary across the country and will need to be adjusted to suit local circumstances particularly in rural areas where the delivery of services and extent of local infrastructure may not necessarily be supported by the surrounding density of population.”^{lxxxi}
156. The concept of 20 minute neighbourhoods in and of itself was welcomed by those the Committee heard from. Amongst others, Pam Ewen of Heads of Planning Scotland and Craig Isles of South Ayrshire Council, described 20 minute neighbourhoods as good planning and a concept that planners have been working on for a number of years.^{lxxxii}
157. At the Committee's stakeholder event participants highlighted the following key considerations that should be taken into account when designing 20 minute neighbourhoods:
- The need to work collaboratively with communities and community groups when considering 20 minute neighbourhoods to assess the needs in each community, rather than an arbitrary one size fits all approach;
 - Ensuring that 20 minute neighbourhoods include:
 - Local jobs
 - Cultural and heritage activities
 - Transport links
 - Community hubs
 - That we should be striving for mixed use high streets, where people live and

^{lxxix} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 73

^{lxxx} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 73

^{lxxxi} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 73

^{lxxxii} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

work in the area as well as shop.

- That we should not be tied to a 20 minute definition as often the geography of an area will not conform to that. What may technically be a 20 minute journey, may involve a steep hill, or crossing busy roads etc. which limits the use of amenities for many, especially those with accessibility needs.

158. At that same event stakeholders expressed reservations about whether this model would work in all contexts, particularly in rural settings.

159. Friends of the Earth Scotland expressed concern about how 20 minute neighbourhoods could be delivered in rural and island areas without increasing car use:

” Delivering 20 minute neighbourhoods - where people can walk, wheel or cycle to essential services near their home precluding the need for driving - is a flagship policy for the Scottish Government....However, NPF4 does not grapple with the more complex parts of delivering 20 minute neighbourhoods. Namely, that austerity, cost-cutting and centralisation have led to a withdrawal of key services from communities. Many people need to drive miles simply to use an ATM, for example. This point was well-made by Perth & Kinross Council in the earlier consultation. How will these services return to walking distance?^{lxxxiii}

160. In its letter to the Committee the Rural Affairs, Islands and Natural Environment Committee expressed concern about how the model would work in a rural setting:

” The evidence heard at the stakeholder engagement event suggested that stakeholders did not consider the concept of 20-minute neighbourhoods to be workable in a rural context. **The Committee therefore considers that greater thought is needed to if, and how, 20-minute neighbourhoods can apply in a rural setting and this needs to be made clear in the NPF4.**^{lxxxiv}

161. While welcoming the concept, Pam Ewen of Heads of Planning Scotland also stressed that there are significant challenges around deliverability in certain contexts:

” Heads of Planning whole-heartedly supports the concept and the theory, but we need to work through how that can be delivered in rural areas— and how it can be retrofitted. Often, such discussions are about how we will apply NPF4 when new development proposals come to us, but that is only a small minor part of Scotland’s land use change. We need to consider how we will retrofit and what role the public sector has in creating and bolstering 20-minute neighbourhoods.^{lxxxv}

162. NPF4 itself recognises the challenges that arise in rural and island areas:

^{lxxxiii} RSPB Scotland written submission

^{lxxxiv} Local Government, Housing and Planning Committee, *Official Report*, 8 February 2022

^{lxxxv} Correspondence from the Rural Affairs, Islands and Natural Environment Committee

” “Island and coastal communities will need a bespoke and flexible approach to the concept of 20 minute neighbourhoods, for example by identifying service hubs in key locations with good public transport links.”

163. Tony Cain of the Association of Local Authority Chief Housing Officers stressed, however, that significant financial investment will be required to deliver on this model in a rural setting:

” If you want a 20- minute neighbourhood within which you also have health services, libraries, a post office, leisure facilities, parks, and the travel system that supports all that, particularly in rural areas where people who do not own a car genuinely struggle because public transport is often woefully inadequate, you have to invest heavily in the provision of public services.^{lxxxvi}

164. Ian McDiarmid of Shetland Isles Council explained how they have already been trying to work to these principles in Shetland:

” We have zones of preferred development, which aim to be much of what is in the 20-minute neighbourhood concept. The Knab redevelopment site, which is mentioned in NPF4, is an on-the-ground example of how we are trying to implement such policies about living locally. Developing for communities and not for commuters is applicable to every part of Scotland, and not just in an urban context.^{lxxxvii}

165. As previously noted by Pam Ewen, Professor Hague recognised that the problem of creating 20 minute neighbourhoods is not limited to rural areas:

” We need to recognise that the 20-minute neighbourhood applies not only to new developments but to many of our existing neighbourhoods, in which public and private services have been diminishing over the past 10 or 20 years. Using the concept in that context is critical. It is not simply about creating a nice design for a new city development; it is about tackling the legacy that we have.^{lxxxviii}

166. Nicola Barclay of Homes for Scotland highlighted that creating 20 minute neighbourhoods would be a challenge for new developments too:

” Our members certainly have no issue with 20-minute neighbourhoods. They like the concept, but they would probably like a bit more detail on how they deliver that in new places. Although there is a big push for reusing brownfield land, that will not meet all of our housing need, so we have to ensure that any new greenfield releases are connected as well.^{lxxxix}

167. Professor Hague also highlighted the importance of policy 10 on sustainable travel to the success of 20 minute neighbourhoods in ensuring connectivity between neighbourhoods where accessibility is poor. He noted that even in big cities such as Edinburgh, Glasgow, Aberdeen and Dundee, some neighbourhoods are relatively

^{lxxxvi} Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

^{lxxxvii} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{lxxxviii} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{lxxxix} Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

poorly served by basic public transport.^{xc} This sentiment was echoed by Craig Isles of South Ayrshire Council and the Net Zero, Energy and Transport Committee in its letter to us.

168. In his evidence to the Committee the Minister recognised that to deliver on 20 minute neighbourhoods would require more than just planning. In particular he highlighted the importance of the Strategic Transport Projects Review 2 (STPR2) to 20 minute neighbourhoods and the infrastructure that is required.^{xc}^{ci}

169. The Committee welcomes 20 minute neighbourhoods and notes that stakeholders recognise this as a good planning concept. There are undoubtedly, however, very significant challenges associated with delivering on 20 minute neighbourhoods. Whether it's a new development, an existing urban setting or rural or island context careful consideration will need to be given to how it can be applied in each context. Communities will need to be involved in shaping the places in which they are to live and amongst other things, there will need to be a focus on infrastructure and sustainable transport to deliver on these ambitions. The Committee welcomes the Minister's recognition of the importance of STPR2 in delivering on 20 minute neighbourhoods, but would welcome further information from the Scottish Government on how it intends to deliver on 20 minute neighbourhoods across Scotland and in particular in rural and island areas where the challenges of creating 20 minute neighbourhoods would appear to be most pronounced.

Policy 8: Infrastructure First

170. Policy 8 explains the purpose of an infrastructure first approach:

^{xc} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

^{xc}^{ci} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

- ” a) Local Development Plans and delivery programmes should be based on an infrastructure-first approach. They should:
- align with relevant infrastructure plans and policies; including the Infrastructure Investment Plan (investment hierarchy) and National Transport Strategy (sustainable travel and investment hierarchies), the Strategic Transport Projects Review, and the National Marine Plan;
 - be informed by evidence on infrastructure capacity, condition, needs and deliverability;
 - set out the infrastructure requirements of the spatial strategy, informed by the evidence base, and how and by whom this will be delivered; and
 - indicate the type, level and location of the contributions (financial or in kind) that development will be required to make.
- b) Where a development proposal creates an infrastructure need, it should demonstrate how account has been taken of the Scottish Government Investment Hierarchy, including the utilisation of existing infrastructure.”^{xcii}

171. While the adoption of an “Infrastructure First” approach to unlocking development sites was widely welcomed, witnesses were unsure what this would mean in practice and how it might actually be delivered. The Royal Institution of Chartered Surveyors (RICS) indicated that it:

” “...supports Infrastructure First as a policy, but it has various complications in practice. This includes the difficulty in ensuring developers contribute to infrastructure and other costs, particularly when requirements could negate slim profit margins. Funding innovations – such as a potential infrastructure levy – should be investigated as a means of ensuring greater support for infrastructure costs.”^{xciii}

172. In evidence to the Committee the Minister highlighted the existing provisions for an infrastructure levy in the Planning (Scotland) Act 2019 and noted that the Scottish Government will be considering these as part of a broader review of planning obligations.^{xciv}

173. Craig Isles of South Ayrshire Council noted, however, that developers will not have the funds to pay infrastructure levies upfront and stressed that there will be a need for central funding to deliver infrastructure.^{xcv}

174. Nicola Barclay of Homes for Scotland stressed the importance of an infrastructure first approach from a developer perspective:

^{xcii} Scottish Government (2021). [Draft of Scotland 2045: Our Fourth National Planning Framework: consultation](#), page 75

^{xciii} Written submission from Royal Institution of Chartered Surveyors

^{xciv} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{xcv} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022



The plan-led system needs to ensure that, for any sites that are allocated, you already know that water is available, that it is not on a flood plain, that there is capacity on the road and in the school, or that you are going to do something about all those things. It is also important that we programme the sites to tie in with when infrastructure will be provided. I said earlier about how we cannot always bring forward longer-term sites because they are longer term for a reason, which is principally about the delivery of infrastructure.^{xcvi}

175. Pam Ewen of Heads of Planning welcomed the infrastructure first model too, but in so doing noted that this only works with a capital investment programme and an understanding of the consequences of that growth and the pressure that that puts on local councils.^{xcvii}

176. The Committee welcomes the infrastructure first approach. It is vital in the development of places that there are the shops, public spaces and services necessary for communities living in these places to prosper. The success of this will be very much dependent on establishing a public plan led approach. It also needs to be accompanied by investment. It is welcome to hear that the Minister is looking at an infrastructure levy. The Committee would welcome an indication from the Minister of how the infrastructure levy will support an infrastructure first approach.

Productive Places

177. Fiona Simpson, Chief Planner, Scottish Government, explained to the Committee about the purpose of policies 16 to 23:



"Policies 16 to 23 are about productive places. We took account of the changing context of work in that regard. For example, policy 16 covers homeworking and live-work units. There are new policies on sustainable tourism, culture and creativity, and we have made significant changes in draft policies 19 and 20, on green energy and zero waste, which have a critical role to play in the drive to net zero."^{xcviii}

Policy 19: Green energy

178. Policy 19 is concerned with continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045.
179. The Committee explored with the Scottish Government whether the draft NPF4 provided sufficient clarity to renewable energy developers and whether it was being appropriately prioritised. In evidence to the Committee, Fiona Simpson, Chief Planner said:

^{xcvi} Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

^{xcvii} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{xcviii} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

” “We have updated the policy on renewable energy, and it sets out that there is support for renewable energy development with regard to wind farms other than in national parks and national scenic areas. From that, we expect each proposed development to be assessed on a case-by-case basis.”^{xcix}

180. Like others who gave evidence to the Committee, Ian McDiarmid of Shetland Islands Council intimated that the policy in NPF4 sets the right direction for renewable energy.^c

181. Jane Tenant of RTPI Young Planners highlighted that focus should not be solely on wind farms:

” We have focused on wind, but from an environmental management perspective, I can say that it is about a mix of project types and scales. It is about decentralising a lot of our energy to district or neighbourhood level, through heat and power schemes, heat pumps and so on. There are a variety of ways in which we can meet the targets; it is not all about wind, although wind is one part of it.”^{ci}

182. Pam Ewen of Heads of Planning Scotland questioned whether Scotland has the capacity to deliver on the ambitions for wind farms, noting that some councils have already indicated that they are at full capacity.^{cii}

183. Following on from Pam Ewen, Craig Isles of Shetland Islands Council suggested that the burden of delivering on the ambitions for wind farms is not being shared equally between councils.^{ciii}

184. Craig Isles noted too that the consideration of planning applications for wind farms place a huge burden on local authority planning departments at a time when resources are so limited.^{civ}

185. The Committee explored issues around renewables with the Minister. Specifically, given concerns about delays in delivery of renewables the Committee asked whether there should be a presumption in favour of renewables in NPF4. The Minister agreed to revisit the language in NPF4 to see if such presumption could be made more explicit, but noted that any application should be informed by policy 2(a), which states that:

” When considering all development proposals significant weight should be given to the Global Climate Emergency.”^{cv}

186. In its written submission Scottish Renewables, however, suggested that policy 19 does not offer the necessary certainty and clarity:

^{xcix} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

^c Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{ci} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{cii} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{ciii} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{civ} Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

^{cv} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

” We welcome the numerous assertions within the draft NPF4 of the need to expand renewable energy generation as a key enabler of achieving net-zero. However, the current proposed draft NPF4 overall as a roadmap does not support the shared ambition of The Scottish Government and renewable energy industry for an expansion of clean energy deployment.^{cvi}

187. RSPB Scotland in its evidence to the Committee highlighted the potential negative implications of renewables applications on biodiversity:

” Whilst RSPB Scotland does not disagree with the overall national spatial strategy, we have concerns regarding potential challenges that developing onshore and offshore renewables will present. The need to protect biodiversity and unique habitats of the areas is not fully recognised. However, the high-level strategy will not be what delivers on the ground. Whether transformational change happens and whether it happens in time will depend to a large degree on strong policy, guidance and decision-making. Better guidance is needed to support decision making, especially when faced with difficult judgements, potentially conflicting aims and the need to support net-zero and nature positive ambitions.^{cvii}

188. The Committee welcomes the Minister's comments and hopes that NPF4 can make clearer what is expected of local authorities when considering applications for renewables, so that ambitions for renewables can be delivered across Scotland in an equitable and timeous manner. At the same time the Committee notes the reservations of Scottish Renewables and asks the Scottish Government to reflect on them. The Committee also emphasises that any application must be considered carefully and a balance must be struck between our renewable energy ambitions and their impact on biodiversity.

Distinctive places

189. Fiona Simpson, Chief Planner, Scottish Government, explained to the Committee about the overarching purpose of policies 24 to 35:

” The final section, policies 24 to 35, is about distinctive places. Again, there has been a fair amount of change. There are significant changes to policies on city, town and local centres, which aim to respond to the town centres review.

We have a new policy on vacant and derelict land, which is important for supporting sustainable patterns of development. Policy 31, which is on rural development, is a significant change. In the debate on the Planning (Scotland) Bill, a lot of emphasis was placed on growing the population of rural Scotland. We have updated our other policies in the section—including those on peat and carbon-rich soils, on woodland and trees and on coasts—to reflect climate change.”^{cviii}

^{cvi} [Scottish Renewables written submission](#)

^{cvii} [RSPB Scotland written submission](#)

Policy 26: Town centre first assessment and Policy 30 Vacant and derelict land

190. The Committee explored with stakeholders how high streets could be rejuvenated. These raised issues of relevance both to policies 26 and 30 and as such the report considers them together.
191. Both in the Committee's formal sessions and in the informal sessions held by the Committee, members heard concerns about the decline and dereliction of high streets.
192. In particular, members asked witnesses what local authorities could do to effect a change in high streets. Sarah Shaw of Glasgow City Council explained some of the challenges for councils tackling amenity issues:

” When it comes to enforcement, councils have powers to take direct action and serve amenity notices in various situations. The problem is that, often, they do not have a budget to take direct action; the costs of the action have to be clawed back from the owner of the property, which is not always practical. There are practical issues with councils taking direct action. It is not so much a question of giving councils legislative powers; it is partly about giving them the resources to act. The whole concept of repurposing town centres to make them much more multifunctional and less focused on retail should help, but there are practical issues. It will not always be possible to convert shops into housing, but the aim is helpful. NPF4 mentions having more of a focus on town and city centre living. There is a policy that shops that are used for residential purposes should still have active frontages. That is important in a town centre. Similarly, it is important for retail and other town centre uses to have active frontages. We should make that clear.^{cix}

193. Craig Isles of South Ayrshire Council highlighted the particular challenges of vacant and derelict buildings:

” We face a more extreme situation with vacant and derelict buildings. A prominent example in South Ayrshire is the Station hotel in Ayr, of which, I am sure, Mr Coffey is aware. It has an absent landlord, who is not a British national. It is very difficult to engage with that individual. He does not want to engage with the council to resolve the issue. In addition, the building is dangerous and it is costing the council money to make it safe for the public.^{cx}

194. David Stewart of the Scottish Land Commission echoed the concerns about vacant and derelict land and stressed that the best way to respond to these challenges is through a public interest led planning system.^{cx}
195. The Committee did, however, hear about positive examples of town centre regeneration. In particular, the Committee was impressed with the work being undertaken by Celebrate Kilmarnock which has driven community led regeneration.
196. The Committee explored these issues with the Minister who highlighted the suite of

cviii Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

cix Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

cx Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

cxii [Scottish Land Commission written submission](#)

policies in NPF4 intended to discourage out of town developments and place a greater emphasis on town centres. He also highlighted a series of initiatives separate to NPF4 that are intended to drive the rejuvenation of high streets:

”there is the work on permitted development rights that I mentioned earlier, the work on land assembly and CPO, and the work on masterplan consent areas. A huge amount is being done on the planning system and what we can do with it. Other work that I am taking forward through other aspects of my portfolio includes work in response to the review of the town centre action plan that was conducted by Professor Leigh Sparks. We are working at pace with COSLA to deliver an action plan in response to that.

You will also be aware of the forthcoming national strategy on economic transformation, following which we will publish a retail strategy, which has been developed with stakeholders. We are seeking to pull a range of different levers to influence the amenities, services and range of opportunities that are available in our town centres and urban spaces. It will take a collaborative approach, and local government obviously has huge involvement as the lead agency in delivery. We provide support, including for example through the £325 million place-based investment programme and the £50 million vacant and derelict land programme, which has a role to play.^{cxii}

197. The Committee welcomes the Minister's commitment to affecting an improvement in our town centres through NPF4 and other initiatives and will be paying close attention to how these progress. The Committee is keen to see how NPF4 and any other powers available can be deployed effectively in order to improve our town centres. The Committee explored the use of amenity notices in connection with this and considered whether they were an effective tool in delivering change, but no conclusion was reached on this.
198. The Committee would be keen, however, to hear from the Minister on what lessons can be learned from effective initiatives such as Celebrate Kilmaronock.

Delivering our spatial strategy

199. The final part of NPF4 is concerned with delivery. Fiona Simpson, Chief Planner, Scottish Government explained that the Scottish Government was still developing this section:

” The final part of the document touches on delivery, which is still a work in progress. The Committee conscious that this is a draft and that more work will be needed on delivery, but it has touched on the importance of thinking about how the NPF will be delivered and about the tools and mechanisms that could support that.^{cxiii}

200. In this section of the report the Committee considers not only what the document

^{cxii} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{cxiii} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

provides for by way of delivery, but also what it considers needs to be in place for effective delivery. Specifically, the report goes on to consider:

- The resourcing of planning departments
 - Budgetary information
 - Outcomes statements and measurements of outcomes
 - Interaction with other plans and policies
201. Many witnesses raised concerns about the deliverability of various aspects of draft NPF4. Aberdeen City Council highlighted that:
- ” “The delivery mechanisms are absent from the National Development chapter. As such, better focus on delivery actions and agents is required.”^{cxiv}
202. There were widespread calls for a delivery programme to be published, including from the Built Environment Forum Scotland and SURF. Homes for Scotland questioned how it could properly assess the Framework in the absence of a fully formed delivery section. The Royal Incorporation of Architects in Scotland also expressed similar concerns:
- ” A delivery plan is essential and required to understand how the strategic priorities etc will be brought forward. A clearer indication of the collaboration required and the organisations and their responsibilities is essential.”^{cxv}
203. The Minister, however, stressed to the Committee that it would not be appropriate to produce a delivery plan until the framework has been finalised.^{cxvi}
204. The Committee would welcome sight of a fully formed delivery plan at the earliest opportunity, so that it can apply careful scrutiny to it.

Resourcing of planning departments

205. To provide for the kind of public interest led planning needed to deliver the ambitions of NPF4 local authority planning departments need to be properly resourced. However, there was almost universal concern across witnesses, from Homes for Scotland to Heads of Planning Scotland about the resourcing of planning departments.
206. RTPI Scotland stated that planning departments in Scotland have collectively experienced a 42% cut in real terms since 2009, despite an increase in planning duties and obligations.^{cxvii}
207. COSLA, RTPI Young Planners and Heads of Planning Scotland indicated that there would be a need for 700 new planners over the next 10 to 15 years help reach net

cxiv [Aberdeen City Council written submission](#)

cxv [Royal Incorporation of Architects in Scotland written submission](#)

cxvi Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

cxvii Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

zero carbon targets. Jane Tenant of RTPI Young Planners noted that this problem was exacerbated by the age profile of council staff:

” Recent studies have shown that only around 9 per cent of local authority staff are under 30 years old, which means that we are top-heavy as a profession. The replacement demand for planners is particularly high. We have 2,100 members in Scotland, so we will need to replace 500 or 600 planners over the next 15 years, which is ultimately a quarter of what we have.^{cxviii}

208. Pam Ewen of Heads of Planning stressed the urgent need for new planners:

” As chair of HOPS, I cannot stress enough the critical need to properly resource planning authorities. That need is for now; it is not for three or seven years’ time and it cannot wait another decade.^{cxix}

209. Robbie Calvert of RTPI Scotland noted that without proper resourcing it will be almost impossible to deliver on the ambitions of NPF4. For example, quality community engagement will not be able to be undertaken as it is so resource intensive.^{cxx}

210. Councillor Heddle giving evidence on behalf of COSLA, advocated for full cost recovery in order to be able to properly fund planning departments. In particular he stressed the resource that will need to be put into training not only new planners, but also existing planners who will need to be re-skilled to meet the ambitions of NPF4.^{cxxi}

211. Similar concerns were expressed in the Committee’s informal sessions and are also highlighted in the letters from the Rural Affairs, Islands and Natural Environment Committee’s and Net Zero, Energy and Transport Committees.

212. SURF- Scotland’s Regeneration Forum highlighted similar resource issues effecting local government regeneration officers:

” There is a capacity challenge among local government regeneration officers, who reported in SURF’s 2021 Manifesto consultations as being overwhelmed with new policy and strategy. There is a concern that NPF4 will add to a busy and complex policy landscape around place-based regeneration, with its conflicting priorities and added reporting pressures, rather than simplify it. This issue is set in a challenging context of budget cuts, departmental mergers and early retirement of skilled staff in local government in Scotland; a legacy of the 2008 economic crash.^{cxxii}

213. Professor Hague suggested that within the constraints of limited resources, perhaps there could be a redirection of resources:

cxviii Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

cxix Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

cxx Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

cxxi Local Government, Housing and Planning Committee, [Official Report](#), 8 February 2022

cxxii [SURF - Scotland's Regeneration Forum written submission](#)

” ...perhaps we could shift some of the capacity in planning departments towards work on regenerating existing neighbourhoods instead of dealing with applications for new developments beyond the edge of the city, which go against the development plan and are a drain on the resources of all concerned.^{cxxiii}

214. Professor Hague also stressed the importance of having a system that is as simple and clear as is possible when resources are so stretched.^{cxxiv}

215. The Committee explored its concerns about resources with the Minister. The Minister recognised these concerns:

” I absolutely recognise that concern. Indeed, I have made that point very clear in my engagement with stakeholders and in my responses to questions in Parliament on my statement back in November introducing the draft NPF4. Delivery is absolutely key. The visions and ambitions in NPF4 are one thing—we need to deliver on the ground. Human and financial resources are, of course, inextricably linked. At the outset, I want to say that I respect the fact that local authorities are autonomous bodies and that it is for them to decide how they allocate their budgets, but I hope that we would all recognise the immense value of planning and planners. We have introduced regulations on fees, and I am working with stakeholders not just on the implementation of those regulations but on looking at full cost recovery in future. Full cost recovery might be a neat expression, but it is quite a complex area and delivering it in practice requires a lot of detailed work and consideration. I have committed to taking that work forward.^{cxxv}

216. The Committee would welcome the Scottish Government's view on how this issue of resourcing planning departments is addressed. The Committee welcomes the Minister's commitment to exploring how full cost recovery can be delivered. Having properly resourced planning departments will be essential to the success of NPF4. Given the current state of local authority planning departments it is debateable whether even with full cost recovery within the development management function they will have the resources to move toward the kind public led planning necessary to realise the ambitions of NPF4. In any event, it is key that any funding coming to local authorities from full cost recovery is retained by planning departments. It is also key that not only is there a very significant increase in the number of local authority planners but both current and new planners must be given the training and skills to work in this new environment.

Budgetary information

217. In evidence to the Committee the Minister made clear that NPF4 is a development

cxxiii Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

cxxiv Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

cxxv Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

plan and not a capital investment plan.^{cxxvi}

218. Prior to this in its technical document on the 2018 Planning Bill, the Scottish Government made clear that NPF4 would not be a "spending"^{cxxvii} document but said it would "have clear read across to funding arrangements"^{cxxviii}
219. Concerns were raised about how viable NPF4 is in the absence of capital investment programme to accompany it. Pam Ewen of Heads of Planning Scotland argued that:
- ” The capital programme is absolutely essential, but it is not just about capital; it is also about understanding the revenue consequences—I use the word “consequences” lightly—of new development and growth and the pressure that that puts on local councils. It is about understanding the capital and revenue implications of NPF4 and setting out clearly how that will be driven forward.^{cxxix}
220. Robbie Calvert of RTPI Scotland also expressed concern about the absence of a capital investment programme:
- ” For example, the infrastructure investment plan contained only three of the national developments, and none is mentioned in the programme for government, so we are concerned about where the investment will come from to help to deliver those things. From that perspective, a capital investment programme would be useful. I agree absolutely that it is necessary to understand what kind of resource will be required by the planning system in order to deliver the intentions of the framework and other things that were introduced in the Planning (Scotland) Act 2019, such as local place plans.^{cxxx}
221. It was noted, however, by a number of witnesses including Professor Hague and Professor Sparks that funding does already exist and it is about aligning it to NPF4.

222. The Committee would welcome further reflection from the Scottish Government on what more could be done to make clear where funds do exist and how they align with the ambitions of NPF4. However, the Committee would also welcome further reflection from the Scottish Government on why NPF4 does not need to be accompanied by a capital investment programme.

Outcomes Statement and measurement of outcomes

223. The Planning (Scotland) Act 2019 requires the Scottish Government to publish a

^{cxxvi} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{cxxvii} Local Government and Communities Committee, 8th Report, 2018, [Stage 1 Report on the Planning \(Scotland\) Bill](#) (SP Paper 318), page 22

^{cxxviii} Scottish Government. (2017, December). [Review of the Scottish Planning System: Technical Paper](#).

^{cxxix} Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

^{cxxx} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022

statement of how its draft National Planning Framework meets the following outcomes:

- "(a) meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people^{cxxxix},
- (b) improving the health and wellbeing of people living in Scotland^{cxxxix},
- (c) increasing the population of rural areas of Scotland^{cxxxix},
- (d) improving equality and eliminating discrimination^{cxxxix},
- (e) meeting any targets relating to the reduction of emissions of greenhouse gases, within the meaning of the Climate Change (Scotland) Act 2009, contained in or set by virtue of that Act^{cxxxix}, and
- (f) securing positive effects for biodiversity^{cxxxix}."

224. Andy Kinnaird, Head of Transforming Planning, Scottish Government, told the Committee:

”We included a first cut of the statement at annex A of the draft NPF4 in the interests of transparency, and I appreciate that that is what the Law Society is referring to. The first cut cross-refers to some of the policies contained in the draft NPF4, which we think demonstrates how those will contribute to the outcomes. However, we have also included a specific consultation question to explore the new requirement and the draft text that we have offered to make sure that it is sufficiently robust. We will revisit things with the benefit of the responses that we receive when we formally produce the statement that is required to accompany the final version of NPF4. However, it might have been revised by that time.”^{cxxxvii}

225. In order for the Committee to check on the progress of NPF4 there needs to be clear outcomes against which the Committee can measure its effectiveness.

226. Dr Caroline Brown stressed the importance of monitoring:

^{cxxxix} [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(a)

^{cxxxix} [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(b)

^{cxxxix} [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(c)

^{cxxxix} [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(d)

^{cxxxix} [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(e)

^{cxxxix} [Town and Country Planning \(Scotland\) Act 1997](#), section 3A(3A)(f)

^{cxxxvii} Local Government, Housing and Planning Committee, [Official Report](#), 18 January 2022

” We definitely need implementation and monitoring...Planning has not been very good at reflecting on how well it has performed in the past. Yesterday, I was wondering to myself whether a published evaluation of NPF3 was available; I could not find one. I do not know whether anything like that has been fed into the preparation of the draft—forgive me if I have missed it. However, such questions are important. I do not suggest that we should invent a new system for doing that or should add burdensome requirements for reporting on it, but it is fundamental to knowing whether what we are trying to do is happening, and whether the policies that are in place are delivering for us.^{cxxxviii}

227. We need to properly monitor and evaluate the effectiveness of NPF4 and how it is being delivered by local authorities. To that end, the Committee would welcome a commitment from the Scottish Government to producing an annual evaluation of NPF4 against the outcomes set out in Town and Country Planning (Scotland) Act 1997. The Committee would also welcome consideration of how benchmarking in local government could be used to ensure that the ambitions of NPF4 can be delivered.

Interaction with other plans and policies

228. For NPF4 to be successful and deliverable it must have a clear relationship and consistency with other related strategies and policies. Witnesses raised concern, however, about the lack of an explicit link in NPF4 to other strategies and policies.

229. The Association for the Protection of Rural Scotland expressed disappointment that NPF4 did not include any reference to the Land Use Strategy:

” 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.^{cxxxix}

230. Tony Cain of the Association of Local Authority Chief Housing Officers suggested that there are weaknesses in the link between the document and some other

^{cxxxviii} Local Government, Housing and Planning Committee, [Official Report](#), 25 January 2022
^{cxxxix} [Association for Protection of Rural Scotland written submission](#)

strategies that either are in place, should be in place or will be in place. In particular he highlighted the omission of Housing to 2040 from NPF4.^{cxl}

231. Amongst others, Ailsa Macfarlane of Built Environment Forum Scotland expressed concern about the lack of reference to the heat in buildings strategy.

232. The Rural Affairs, Islands and Natural Environment Committee also expressed concern about the lack of reference to other related strategies:

” ...the relationship between NPF4 and a number of other policies and strategies could be more explicit and the NPF4 could elaborate on how conflicts between them are dealt with – which strategies take priority.”

233. It should be noted that this concern was also expressed in relation to NPF3 by the Infrastructure and Capital Investment Committee which highlighted COSLA's suggestion that NPF should be coordinated with plans such as the Climate Change Plans and Zero Waste Plans.

234. The Minister in evidence to the Committee argued that as NPF4 is a long-term strategy it would not be appropriate to include reference to strategies and policies that might not have the same life-span. He did stress though that NPF4 is closely aligned with strategies such as Housing to 2040 and the strategic transport projects review 2 (STPR2):

” There have been requests that there be, throughout the NPF, explicit name checking of, and cross-referencing to, other policy documents, but it is important to bear it in mind that the NPF is a long-term strategy that will have a statutory role in decision making, so we must be careful not to cross-refer to a range of documents that might not have the same lifespan, thereby causing policies to become outdated. That risks causing confusion and uncertainty. I can assure the committee that we are strongly aligned with other policies and strategies—for example, the strategic transport projects review 2, “Housing to 2040”, place-based approaches and our land-use strategy, to name but a few.

235. The Committee welcomes this assurance from the Minister that NPF4 is strongly aligned with other strategies. The Committees does recognise too the risks associated with explicit reference to strategies and policies that may become outdated during the life of NPF4. At the same time, the Committee would ask the Scottish Government to consider what more could be done to enable users of NPF4 to better understand how NPF4 links to other strategies and the synergies between them, so that they can take them into account in decision making.

Housing Numbers

236. In the final section of this report the Committee considers the Minimum All-tenure Housing Land Requirements (MATHLR) , which appears in Annex D to the draft NPF4. MATHLR sets out the minimum number of housing units that local, city-

^{cxl} Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

region and national park authorities must plan, as a minimum, to accommodate in future development plans.

237. Each Planning Authority in Scotland has been presented with a minimum all-tenure housing land requirement and each has been invited to present an alternative scenario if they wish to do so.

238. A number of witnesses questioned the housing figures in MATLR. For example, Homes for Scotland argue that they:

” “...serve no beneficial purpose and could actually create confusion and undermine the aim of delivering more homes”.^{cxli}

239. It was suggested by the Scottish Property Federation that the minimum targets are not set high enough and would reflect a reduction on the number of homes being built annually.

240. The Committee wrote to all local authorities to seek their view on the minimum targets. The majority of responses expressed concern about the minimum targets suggesting that they were not high enough. For example, East Ayrshire Council indicated that the minimum all-tenure HLR for East Ayrshire is a 350 unit requirement (including flexibility allowance of 30% or 0.30) over a ten year period. The Council indicated that figure would be insufficient to meet the aspirations and real demand for new homes in the area, as well as the vision and aims of the forthcoming Local Development Plan 2 (LDP2). Instead, they proposed a figure of 4100 units over a ten year period.

241. Comhairle nan Eilean Siar also expressed concern about the application of MATHLR outwith an urban setting:

” We would note our immediate concerns about the whole MATHLR process, which is very much geared towards higher populous authorities with significant development and volume house building. There was limited scope in the methodology to recognize the specific nuances (e.g. no private sector volume house builders/building, significant windfall development, exacerbated supply chain, land tenure, hidden housing need) and smaller absolute numbers characteristic of smaller and islands authorities. The application of a 50 unit rounding completely disadvantaged us.

We concluded that the rounded down figure was too conservative (in effect, halving our evidenced need) and we would require considerable upward flexibility in order to meet projected demand, economic aspirations, and population initiatives.^{cxlii}

242. Concerns were also expressed about the robustness of the Housing Need and Demand Assessment^{cxliii} (HNDA) tool and the low figures it has produced in some areas.

243. Nicola Barclay of Homes for Scotland suggested that a complete review of HNDA is

cxli [Homes for Scotland written submission](#)

cxlii [Comhairle nan Eilean Siar written submission](#)

cxliii <https://www.gov.scot/publications/hnda-practitioners-guide-2020/>

required:

” We need to get the process right. HNDA needs to be reviewed, root and branch, to make sure that we are creating the baseline numbers for which we can then provide. Then we can have the conversations about where and of what type and tenure the housing should be. Unless we have the numbers right in the first place, we are on a hiding to nothing and we will be planning for decline. That is not, I think, what the Scottish Government wants to do.^{cxliv}

244. Tony Cain of the Association of Local Authority Chief Housing Officers, however, suggested that perhaps the low numbers reflect that the problem is not so much a lack of homes as lack of affordable and accessible homes in Scotland.^{cxlv}
245. Perhaps there also needs to be reflection on different models of house building. The Committee was very impressed with the work it heard about in relation to the development of a Smart Clachan in Comrie. Smart Clachans are community based initiatives to support repopulation by creating affordable housing and shared facilities which enable new households to remain, return and settle. They would appear to the Committee to fulfil many of the ambitions of NPF4.
246. Planning Democracy felt that the culture towards communities needs to change and be more supportive and collaborative and mechanisms and public finance should be in place to transfer allocated land into community ownership to enable community housing.^{cxlvi}
247. The Committee explored these issues with the Minister and he stressed that these numbers are minimum figures and do not in any way place a cap on the number of new homes that should be built within local authority areas. He also suggested that the focus should not be so much on numbers of homes but rather on creating "great places".^{cxlvii}

248. The Committee highlights the concerns expressed to it about the lack of ambition inherent in MATLHR. While the Committee notes that these are merely minimums and not a cap it is concerned that having minimum targets may limit ambition at a time when we need to be ambitious to meet Scotland's housing needs. The Committee asks the Scottish Government to review HNDA at the earliest opportunity to develop a tool that is up to date and fit for all areas of Scotland, so that more appropriate projections can be made for local authority areas. The Committee would also welcome further information on how that review will be conducted. The Committee also asks the Scottish Government to explain how it intends to ensure that MATLHR, Housing to 2040 and HNDA are better aligned to deliver on the ambitions for housing in Scotland.
249. The Committee would also welcome the Scottish Government's thoughts on alternative models of housing such as Smart Clachans and other community led initiatives as a means to provide housing in different ways and how it can ensure

cxliv Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

cxlv Local Government, Housing and Planning Committee, [Official Report](#), 1 February 2022

cxlvi [Planning Democracy written submission](#)

cxlvii Local Government, Housing and Planning Committee, [Official Report](#), 22 February 2022

that sufficient land is available to enable such approaches.

Conclusion

250. The Committee welcomes NPF4 and its ambition. The Committee has, however, raised concerns in this report about aspects of NPF4 and the capacity of the planning system to deliver on its ambitions. The Committee asks the Scottish Government to reflect on these concerns as it prepares the final version of NPF4 for laying.

Annex A

Partners

1. Built Environment Forum Scotland
2. Rural Housing Scotland
3. Scottish Rural Action
4. Scotland's Regeneration Forum
5. Voluntary Health Scotland

Participants

1. ALGAO / Planning authority
2. Aspire Orkney
3. Biggar Community Council
4. Bridgend Farmhouse Community Hub
5. Built Heritage Officer
6. Cancer Support Scotland
7. Centre for Ecology and Hydrology
8. City Heritage Trust
9. City Heritage Trust and Community Trust
10. Coalfields Regeneration Trust
11. Communities Housing Trust
12. Comrie Croft, Perthshire
13. Corra Foundation
14. Dunoon Area Alliance
15. Fauldhouse Community Development Trust
16. Federation of Small Businesses
17. Fyne Futures
18. Gairloch and Loch Ewe Action forum (GALE)
19. Greener Kirkcaldy
20. Highland Good Food Partnership

21. Lochalsh & Skye Housing Association
22. MAKAR Scotland
23. Mid Steeple Quarter
24. Mull & Iona Community Trust
25. New Cumnock Development Trust
26. Newcastleton & District Community Trust
27. NG Homes
28. Obesity Action Scotland
29. Ochiltree Community Hub
30. Orkney Builders and Pickaquoy Trust
31. Paths for All
32. Planning authority
33. Possilpark Business Improvement District
34. Raasay Development Trust
35. Retired, Planning authority
36. RIG Arts
37. RNIB
38. Rockfield Centre
39. Scotland's Towns Partnership
40. Scottish Community Development Centre
41. Scottish Grocers Federation
42. Scottish Human Rights Commission's Lived Experience Leadership Group
43. See Me
44. SENSCOT
45. Shared Local Authority Archaeology Service
46. Shetland UHI
47. South of Scotland Community Housing
48. St Paul's Youth Forum
49. Stòras Uibhist

50. Tannahill Centre, Ferguslie Park
51. Tombreck Farm
52. University of the Highlands and Islands
53. Wester Hailes Community Trust
54. WHALE Arts

54 organisations represented and attended by 69 individuals (not including facilitators, partners etc.)

MSYPs

1. Fraser Adams MSYP, Cowdenbeath
2. Fabian Butchart MSYP Edinburgh Southern
3. Marcus Flucker Angus South MSYP
4. Mairi Humphreys MSYP Edinburgh Southern
5. Gavin Stewart MSYP, Renfrewshire South
6. Sam Webster MSYP Edinburgh Eastern
7. Amy Winter MSYP, LGBT Youth Scotland
8. Tian Qi Yu MSYP, Dumbarton

