

## **Heads of Planning Scotland (HOPS) response to the Scotland's Fourth National Planning Framework Position Statement**

**19<sup>th</sup> February 2021**

HOPS welcome the opportunity to comment on the NPF4 Position Statement. HOPS is the representative organisation for senior planning officers from Scotland's local authorities, national park authorities and strategic development planning authorities. HOPS has encouraged individual planning authorities to submit comments which highlight local considerations. HOPS are positive about the direction that position statement has taken.

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

HOPS support the prioritisation of addressing net zero emissions within NPF4 and SPP. With over half of Scottish Local Authorities declaring a state of climate change emergency, we note there have already been steps by many to incorporate climate change decisions as part of the planning process. Carbon neutral targets need to be met in relatively short periods of time and it will be key that Scottish Planning Policy can be implemented as quickly and easily as possible by Planning Authorities.

HOPS welcome the intention to introduce a consistent policy to meet Section 3F of the Town and Country Planning (Scotland) Act. Embedding the National Transport Strategy 2 Hierarchy within NPF4/SPP will play a key role given the significant impact of transport on emissions. We hope that its incorporation of this into the appraisal and assessment process will help to inform the decision-making process. We note that work has already been undertaken by several planning authorities to do this at a local level.

HOPS support the steps being proposed with regard to existing and future development. There will be a key role for Planning and Building Standards to work together to improve the standards new development. We note that many local authorities already have in place requirements to meet higher standards than those set nationally for new build construction and appreciate the steps proposed within NPF4/SPP to support the delivery of high-quality emission reducing development. To ensure achieving higher standards HOPS considers that changes are best to come through Building Regulations where they will be required, as opposed to solely relying on planning policy.

Clarity in policy on a wider range in energy generation technology is welcomed. We hope this will also be able incorporate new technologies as they appear. We recognise this is already a rapidly changing field and there will be a need for the planning system to be able to accommodate future changes.

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

HOPS generally support the approach taken.

The effects of COVID-19 have introduced additional pressures on the health and well-being of communities. There is a key need to embed health at the forefront of the planning system. The planning system will need support on public health matters, and we see Public Health Scotland having a role to play as a consultation authority.

HOPS note that individual planning authorities will comment in more detail about their own requirements. The support of “20-minute neighbourhoods” is welcomed as an overarching principle and note the concept is already being supported by many local authorities. HOPS would welcome clear criteria to help support decisions being made to shift towards sustainable transport, access to work, amenities and more inclusive housing provision. Again, the ability to ensure delivery at a local level will require a strong, deliverable national policy.

Local Place Plans are seen as welcome community driven approach to support place based solutions, there is some concern that the cost of these (as shown the in [RTPI Paper: Financial Implications of Implementing the Planning Bill](#)) may be prohibitive to the communities who need them most.

HOPS have previously commented on the technical consultation on proposed policy amendments in regard to housing, the response can be found [here](#). Robust Scottish Planning Policy on housing will support the work that planning authorities undertake. We agree that the current focus of maintaining a 5-year housing supply should be addressed and there will be greater long-term benefits by shifting that policy focus towards delivering quality development to appropriate locations. The emerging Regional Spatial Strategies will help to focus housing priorities beyond local authority boundaries. The infrastructure first approach will be integral to the process of appropriate site selection.

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

HOPS welcome the approaches taken. We agree the shift from economic growth to a wellbeing economy is required.

HOPS would be keen to see more information on how NPF4 will look at population trends. From a national perspective requirement in looking at housing numbers, integrated infrastructure investment etc. will be vital in the creation of healthier and fairer places. There is further opportunity for NPF4 to align with Indicative Regional Spatial Strategies (IRSS) and we would wish further details in how these should look and how Planning Authorities can collaborate on this.

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

HOPS welcome the approaches taken. The Place Principle, 20 Minute Neighbourhoods and Town Centre First approaches will be key to encourage the collaborative working required to make the best decisions required for better, greener places.

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

HOPS recognise the need for clear and accountable planning system, this will have to take a whole system approach to be successful. Monitoring the impact and outcomes of planning policy should be an integral part of the system. NPF should be accompanied by a detailed delivery programme setting

out the responsibilities of stakeholders and including a set of indicators to evaluate the policies set out within

HOPS commend the very ambitious goals set out within the strategy. NPF4 has an opportunity to define what success may look like and establish clear links between to other national strategy documents to help understanding of the important role of the planning system, not only for policy makers but elected members and the public.

HOPS recognise the role that Planning Authorities will have to play in delivering the ambitions within the strategy. Key to helping deliver the ambitions within NPF4 will be utilisation of the skills and experience of local authority staff. In light of decreasing local authority budgets HOPS consider it essential that Scottish Government use this opportunity to look at the benefits that properly resourced planning authorities can bring and use powers available to move towards full cost recovery. In addition HOPS have previously provided a think piece looking at the role of [Chief Planning Officers](#). It will be crucial that Planning is represented at the highest local authority level to help enable the delivery of the strategy. HOPS will continue to support these positions.

HOPS welcome the infrastructure first approach that will be taken and look forward to seeing further information on how delivery of the NPF is intended and funding mechanisms. The delivery aspect of NPF4 will be crucial and detail will be needed on funding, timescales and identifying leading bodies to take various aspects forward. A linked capital investment programme is seen as the best vehicle to help deliver the ambitions of NPF4.

The recently published Digital Strategy will have a significant role to play in the delivery of NPF4 and SPP. One of the key missions within the strategy is to unlock the value of planning data. HOPS acknowledge that up to date, consistent and quality datasets will be crucial in supporting policy changes and evidencing decisions made. HOPS would wish to work closely with the Scottish Government and other partners in ensuring that robust spatial data is available to do this.

HOPS already work closely with Planning Authorities, Scottish Government and COSLA to produce Planning Performance Framework Reports (PPF) and would welcome any future opportunities to work with National Planning Improvement Coordinator and Digital Planning to help improve the monitoring of planning performance across the whole system, including that of policies to be set out within the NPF.

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

No comments.

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

Throughout the document many of the potential policy changes will require robust wording, we particularly note the repeated use of the word “support” within the proposed policies in the

document. It will be key that policy changes are strong and explicit enough to allow Planning Authorities to make decisions focusing on the type of development that the National Planning Framework aims to deliver with confidence.

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