

Heads of Planning Scotland (HOPS) response to the consultation on the Draft National Planning Framework 4 (31st March 2022)

Part 1 – A National Spatial Strategy for Scotland 2045

Sustainable Places

Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment.

Q1: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

HOPS recognise that the new style NPF 4 represents a significant shift in national planning policy as a response to the contemporary planning and environmental challenges we need to face.

HOPS support the anticipated benefits of

- Better use of scarce resources
- More efficient use of energy, in all its sustainable forms
- Investing in Net Zero
- Investing in nature- based solutions.

HOPS support in principle the concept of Sustainable Places and welcome its prominence in the overall spatial strategy for Scotland. Indeed, sustainable development has been at the heart of planning policy for many years. We do not see the 4 individual components of the Spatial Strategy as being independent of each other and we agree that it must be a shared vision across Scotland which has this as an over-arching principle.

HOPS are pleased to note the move towards embedding green infrastructure first, a renewed emphasis on the circular economy and the equitable use of assets.

HOPS have a concern that generally this section “lacks teeth” to enable developers to deliver and although the approach is laudable it is challenging to reconcile pursuing growth with climate resilience.

The principles set out on Page 10 should be an integral part of the policy and there is a need to include references to nature and biodiversity. There also needs to be more of a balance between urban and rural characteristics.

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 places are developed, and it will require a significant change in the design approaches by developers to be successful. There are numerous good quality places that have been developed, however, Draft NPF4 is seeking to be bolder but the policy wording

needs to ensure that the ambition is deliverable and supported by all the players in the planning system.

Draft NPF 4 provides the correct spatial dimension for wider sustainability discussion, but it needs a clear reference to an approach based on “the right development in the right place”.

There continue to be difficulties in securing land control and the ability to better manage housing and infrastructure delivery will continue to be major challenges for affordable housing.

HOPS consider that the use of the term “sustainable” is open to wide and varying interpretations and the policy wording requires to be more forceful, and clear if the new, bolder approaches envisaged for NPF4 are to be realised.

Overall, HOPS feel that the proposed ambition can be achieved but it must be recognised that the NPF has to align with other existing and emerging national strategies (e.g., the 10-year National Strategy for Economic Transformation).

Liveable Places

Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live.

Q2: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

It is encouraging to see that planning’s role in supporting better health and wellbeing actions is explicitly recognised as HOPS see this as an important underlying factor.

HOPS support the Place and Wellbeing outcomes identified by the Improvement Service as set out in their “Integrating Land Use Planning Public Health in Scotland” and consider that this approach should be referenced in Draft NPF4.

HOPS support this concept, in principle, but consider there are inherent difficulties for existing settlements where there is decline and brownfield sites sitting vacant and derelict. 20 - minute neighbourhoods are also a welcome feature, but they are urban biased, and difficult to retrofit or even deliver in rural areas. They can also be a misnomer and used in an artificial manner. Terms such as “local living” or “living communities” may be better descriptions of what we are trying to achieve.

HOPS consider that there is loose wording, and further clarity and more guidance and detail required.

HOPS welcome the references to the impacts of COVID-19, but they need to be expanded to set out how this will impact on the liveability of spaces, and what changes will be needed in

the future to create resilience and capacity. e.g., work from home spaces, dwelling sizes transport links etc.

Delivering liveable places requires a deep understanding of local context and HOPS feel that Draft NPF 4 should be more explicit in stating that LDPs will be the key to delivery and implementation.

Questions remain as to how general terms such as “high quality” and “great places” can be adequately defined.

Part 3 of the Draft NPF4 provides a better understanding of how Government sees these themes being implemented both through the Local Development Plan and Development Management functions and therefore greater interlinking between different parts of Draft NPF4 needs to be done.

Productive Places

Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing.

Q3: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

There appears to be a dichotomy here between economic growth and both zero carbon and green recovery objectives.

It has to be recognised that this principle will not be able to achieve all of these aspirations at the same time and economic, social or economic cannot avoid being compromised to achieve business and economic growth.

“Business and Employment “is rather an out-of-date term which does not cover the vitality and significance of emerging employment solutions.

Digital Infrastructure and Innovation are not mentioned here but it is set out In Policy 23, especially given the knock-on effects of COVID -19.

Definitions are required for many of the terms used, including “community wealth”, “fair work” and “good green jobs”. If such phrases are not defined these will be open to interpretation and debate through planning applications and appeals.

The culture and creativity sections need expanding and in a general sense there are too many policies which include “should’ rather than “musts” which undermines a strong policy approach.

As a general point there are some policies which are clearly Development Management policies and others where the wording and intent is less clear. These need to be made more explicit.

Distinctive Places

Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.

Q4: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Scotland already has many distinctive places, and they should be celebrated. This is not a new concept which will start to happen because of Draft NPF4. It has been embedded in the planning system for some time.

There is a heavy focus on protecting our best places but there is not enough emphasis on challenging developers, local authorities, communities and politicians to create “the best places of tomorrow”.

This section would benefit from including landscape and heritage assets. There is no mention of renewables and how local people can shape their place. This will be a feature of the new Local Place Plans approach and needs to be properly resourced if continuing confidence in the planning system is to be maintained.

Overall HOPS consider that whilst the aspiration is laudable placemaking is often lacking in new developments as developers often design to the minimum standards. Positive stances by local authorities to reject sub-standard designs must be supported by Scottish Government and DPEA decision makers.

Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

HOPS consider that the Spatial Strategy as designed has the potential to deliver provided it is properly aligned with other key national spatial strategies. The spatial principles set out are considered to be appropriate, but more clarity and definitions are required. For example, what does rural and urban synergy mean, and what is “a Just Transition” and “Balanced Development” and how can planning contribute to that? Clarity is also needed on “local living” and “compact growth” and further guidance is required. Again, clear and precise terminology is important to achieve the Draft NPF4 intentions.

There is a lack of reflection on Scottish Planning Policy (SPP) specific paragraphs cuts through this section and landscape and heritage assets should be specifically mentioned.

In general terms these principles are not new, but it needs a strong policy framework to be in place to deliver the spatial principles.

HOPS want to see a more collaborate approach to higher design standards and innovative architectural solutions to all developments, but especially housing developments which, in most cases, remain formulaic and uninteresting.

HOPS' view is every policy and principle will make a contribution to the delivery of sustainable, liveable, productive and distinctive places rather than the reference to “no single policy”.

HOPS consider that there is a need for clarity on the decision- making weight of these principles and there should be more emphasis on aiming for “the right development on the right places” rather than where developers want to go.

HOPS consider that this section is well intentioned, but it seems to lack clarity and definitions, but we recognise that all areas can support all spatial strategies and this needs to be articulated. Some of the concepts translate differently between urban and rural contexts e.g., 20 - minute neighbourhoods which is seen very much as having an urban focus.

Spatial principles

Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

Yes, but HOPS are concerned about what status the 6 principles will have in determining planning applications, if any. It would help all stakeholders if this was spelled out more clearly, and it may be better to refer to these in the Part 3 Policies, which presumably will be the principal material considerations.

1. **Compact Growth** - HOPS supports the sentiment here to “limit” urban expansion and to make the best use of scarce land resources with an emphasis on reusing existing land and buildings. The term limit needs to be better defined.
2. **Local Living** – This principle is supported but it needs further clarity. E.g., how will 20 - minute neighbourhoods work in practice? Rural and Island communities will function entirely differently.
3. **Balanced Development** – HOPS support the concept of “balanced development” whatever that means but planning has always been based on “the right development in the right place”
4. **Conserving and Recycling Assets** – HOPS supports this and believes it is a crucial element in the ambitions for green recovery, climate change issues and the journey towards zero carbon.
5. **Urban and Rural Synergy** – A concept which is supported by HOPS.
6. **Just Transition** – HOPS supports this principle but feels that it warrants more practical reference points and clarification.

Spatial principles

Spatial Strategy Action Areas

Q7: Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Yes, but with some concerns and queries.

HOPS support the principle of designating Action Areas, but we consider that the role set out is confusing, too simplistic and it seems to be a regional approach using national policies.

The areas appear to be contrived, and their geographical delineation is crude and simplistic. Some areas overlap with each other, and this adds to confusion.

We feel that the titling of each grouping - Innovation, Transformation, Transition, Revitalisation and Sustainability – is artificial and these “branding” terms can apply to all of Scotland and are not geographically restrained.

The removal of Strategic Development Plans (SDP) and the introduction of Regional Spatial Strategies further complicates the picture and the status of these area designations for planning application decision making is unclear.

HOPS question the relevance of this section and whether it adds any value to planning decision making.

The deliverability within the designations is also queried and the linkages between areas.

The designation of the whole Central Belt, particularly bringing Glasgow and Edinburgh together, appears optimistic and may marginalise the areas in between.

HOPS consider that this section seems to be contrived and is not considered to add to what Draft NPF4 can deliver. There needs to be more clarity on the role of Regional Spatial Strategies and how Local Development Plans are to reflect these ambitions in their strategies and policies.

Q8: to Q17:

HOPS has not provided specific comments on this part of the Draft NPF4 as we feel that it is more appropriate and relevant for individual local authorities covering these areas to respond on the likely impacts in their areas. They are also better placed to understand the linkages between adjacent areas and the related geographies and patterns of investment being planned.

See HOPS comments to previous Question 6.

National Spatial Strategy

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

Subject to the comments made previously, HOPS considers that it is important to have a National Spatial Strategy and welcome the wider ambitions outlined by the Scottish Government, such as climate change actions, health, and wellbeing.

Part 2 – National Developments

Q19: Do you think that any of the classes of development described in the Statements of Need should be changed or additional classes added in order to deliver the national development described?

HOPS have no specific comments to make on the classes of development identified.

Q20: Is the level of information in the Statements of Need enough for communities, applicants, and planning authorities to clearly decide when a proposal should be handled as a national development?

Yes.

Q21: Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

Yes.

HOPS consider that this is a matter for the local authorities to comment on, but we noted in the Supplementary Information that there were 34 Alternative National Developments submitted by local authorities in the last few years. Although these have been assessed and do not feature in the Draft it would have been helpful to stakeholders and investors to see these potential projects mapped and listed, in the NPF4, especially as we are planning a further 20 years ahead to 2045 and presumably, some of these proposals or variations of them may be developed by then.

a) HOPS views on each of the National Developments in the text boxes provided below.

HOPS support the inclusion of National Developments in terms of continuity and certainty, but HOPS do not have a particular view on the 18 specific sites proposed as national developments and what may be excluded. It is a matter for individual local authorities and partnership groupings to advance the case for any national developments they consider have been omitted from the national strategy. As mentioned in the response to Q21. above, and notwithstanding the previous formal consideration and assessment of candidate sites by the Scottish Government, HOPS understands from its members that there some competent developments which they consider have been omitted from Draft NPF4 and the individual cases for inclusion in the finalised NPF4 will be submitted by the relevant authorities for consideration.

b) HOPS comments on the National Developments section of the NPF4?

HOPS are pleased to see the continuation of designating national developments in NPF4 to provide the national focus for the delivery of the Scotland wide spatial strategy.

Stakeholders, however, will need to understand how success/planning's contribution to achieving these can be measured.? Taking this further, for renewables, HOPS do not see a direct link to planning here e.g., Cruachan and other pumped hydro schemes and wind farms over 50MW and high voltage lines will not be considered under the TCPA but Electricity Act. The same goes for Digital Fibre Network - most likely none of the cabling will require express consent. This is where the context and linkages with other Scottish Government Policies/Frameworks and responsibilities needs to tie up.

It is noted that there are some national developments which apply to all of Scotland, such as a National Walking, Cycling and Wheeling Network and some are much more defined within a specific geographical area, like Chapelcross Power Station Redevelopment. There is also a continuity of national developments from previous NPFs which is helpful in terms of consistency of approach.

HOPS welcome the typology used to illustrate the graphics and appreciates that there is an element of graphic freedom in the precision of the mapping. When national developments are submitted for formal consideration, they will obviously be site/area specific, and this will be easier for local communities and interested stakeholders to understand and appreciate the planning application consultation process.

Part 3 – National Planning Policy

Sustainable Places Policies

Sustainable Places Principle

We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet’s sustainable limits.

Q22: Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Yes.

HOPS support the plan-led approach to sustainable development as reflected in Scotland’s National Outcomes and the UN Sustainable Development Goals.

This policy is also included in the Universal Policy section although it only applies to Local Development Plans.

Addressing climate change is a key overarching principle, however, it is implemented through other national policies. The biodiversity crisis is a key principle, but it is not given much weight in planning decisions at present.

The policy can be strengthened by using the term “climate emergency” rather than simply “climate change” and the outcomes that the policy is intended to deliver need to be clearly set out.

Overall, HOPS consider that this policy section is confusing, and the definition and strategy need to be clarified.

Policy 1: Plan-led approach to sustainable development

Q23: Do you agree with this policy approach?

Yes, with the following observations.

HOPS agree with the principle but does not believe that it is a policy. It is more of a statement or a vision/aim/procedural issue.

As "long-term public interest" is politically defined it is helpful to anchor this in the National Outcomes and Sustainable Development Goal.

HOPS agree with this approach but, consider that there should be more distinction between policies and policy principles, the Development management policies should be policies, but

the policy principles/statements should be separated out to provide greater clarity. It may improve the readability of the document if the Draft was split into Development Plan guidance and Development Management policies to avoid any further confusion.

In overall terms HOPS feel that to be successful, all new development should aspire to achieve the six qualities of place as defined in draft Scottish Planning Policy and reinforced by Creating Places and Designing Streets.

Policy 2: Climate Emergency

Q24: Do you agree that the policy will ensure the planning system takes account of the need to address the climate emergency?

No.

The policy cannot ensure that the planning system takes account of the need to address the climate emergency, but it can encourage, promote and facilitate.

HOPS is pleased to see the continuing references to the Global Climate Emergency set out in Draft NPF4 and the relative weighting being given to the relevant planning policies.

This is an ever increasingly complex area of partnership working across a wide range of stakeholders and this needs to be set out in a clearer way. Planning is an important contributor to this challenging area, but it is not the sole or indeed principal player.

The draft policy does require greater clarity to ensure that it can be implemented. HOPS would also welcome clarity on what tool is to be used to assess this policy consistently, bit by Planning Authorities and applicants. This adds greater complexity to assessing planning applications which will impact on key performance timescales, resourcing and upskilling of Planners.

HOPS support the emphasis placed on responding to the climate emergency and accepts that it is a material consideration when determining planning applications. The policy is not able to guarantee this, but it can substantially influence the approach taken. It would be more appropriate to replace “ensure” with “enable”

The new emphasis on the enhancement of biodiversity is welcomed by HOPS. It is clearly linked to other national strategies, such as “Developing with Nature” by Nature Scot. These external links to other critical plans and strategies need to be more explicit and the use of diagrams to connect these strategies would be helpful.

HOPS note the references to “nature networks” which are defined separately from “green networks” but in practice they often overlap. This may be confusing, if assessed against the “habitat networks” defined by Nature Scot.

Policy 3: Nature Crisis

Q25: Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis.

No.

The policy cannot ensure that the planning system takes account of the need to address the nature crisis, but it can encourage, promote and facilitate.

HOPS agree with the principle but does not believe that it is a policy. It is more of a statement or a vision/aim/procedural issue.

The new emphasis on the enhancement of biodiversity is welcomed by HOPS. It is clearly linked to other national strategies, such as “Developing with Nature” by NatureScot. These external links to other critical plans and strategies need to be more explicit and the use of diagrams to connect these strategies would be helpful.

As "long-term public interest" is politically defined it is helpful to anchor this in the National Outcomes and Sustainable Development Goal, HOPS agree with this approach, but we consider that there should be more distinction between policies and policy principles, the DM policies should be policies, but the policy principles/statements should be separated out to provide greater clarity. It would provide greater clarity.

In overall terms HOPS feel that to be successful, all new development should aspire to achieve the six qualities of place as defined in draft Scottish Planning Policy and reinforced by Creating Places and Designing Streets.

Policy 4: Human rights and equality

Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

No.

HOPS have mixed views on the inclusion of human rights and equality in Draft NPF4 as these aspects are covered elsewhere in statute. Whilst totally respecting the need for human rights to be protected and equality measures to be included, it is difficult to reconcile this with the separate legal duties expressed in legislation and the read across into statutory land use planning decisions on planning applications. e.g., Fairer Scotland Duty.

These areas will require to be subject to further clarification and guidance if they are to be relevant to planning processes, and engagement with local communities and stakeholders.

HOPS consider that Policy 4 is a principle, rather than a policy on human rights and quality matters should remain a focus of LDP preparation (where it is subject to Equalities Impact

Assessments) rather than planning applications. HOPS are not convinced that it needs to be expressly set out in a national planning document.

Policy 5: Community wealth building

Q27: Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Yes.

HOPS agree with the policy of supporting community wealth building, but the policy cannot deliver this automatically.

HOPS support the concept of community wealth building, but the concept is not defined and is difficult to directly reconcile it within planning processes. For example, Policy 5b refers to all national and major applications contributing to community wealth building, but it is not clear how this could be achieved within the parameters of a statutory land use planning process. This may well depend on the individual approach being taken by local authorities and whether they have a discrete corporate approach and strategy to deliver community wealth building.

As this is an emerging concept it would be helpful to include practical examples, case studies and detailed guidance.

It also has to be recognised that the terms Community Wealth Building and the Circular Economy are different concepts.

HOPS consider that this concept should be better set out as a principle not a policy and it is better located in an LDP Strategy or a Local Outcome Improvement Plan.

Policy 6: Design, quality and place

Q28: Do you agree that this policy will enable the planning system to promote design, quality and place

Yes, it will enable better promotion, but it cannot guarantee the final outcomes.

HOPS support the general direction of this policy approach and particularly the inclusion of the 6 qualities of Successful Places, but we feel this section is let down by loose and imprecise wording which will complicate the assessment of developments at the development management stages of determination e.g., “references to the “sense of joy”.

HOPS also feel that there needs to be better integration of this policy section within the overall policy sections to reflect the broader concepts of place-making and policies referred to in older documents need to be urgently updated. E.g., Creating Places 2013 and also

Designing Streets 2010. Design concepts and theories have moved on considerably in the last decade and this progress and thinking needs to be reflected in the Draft NPF4.

The real “success” of this policy approach will be how it is implemented on the ground and how it will be defended on appeal if the 6 tests are not met.

Liveable Places Policies

Policy 7: Local Living

Q29: Do you agree that this policy sufficiently addresses the need to support local living

Yes, but this is only a starting point.

HOPS support the sentiment expressed here but it is unsure it merits a stand-alone policy. HOPS would prefer to see it integrated with Policy 6 above and to include on the 20-minute neighbourhood concept.

There also needs to be more emphasis on rural situations where the place and place making contexts are totally different. Much of the Draft NPF4 presents an urban bias in policy framing and this should be better balanced.

The delivery of local services will largely be the responsibility of other public bodies and organisations and may not be in the control of the local planning authority.

HOPS consider that the many references to “20-minute neighbourhoods” may be considered artificial and too manufactured. The aspirations here are to develop and build local areas where people can live in a more balanced way, in terms of the environment, accessibility to services, with improved impacts on their health and wellbeing. There are other national initiatives, such as the Improvement Service’s “Planning and Wellbeing – Integrated Land Use Planning and Public Health in Scotland” which could usefully be referenced here.

Policy 8: Infrastructure First

Q30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

No.

HOPS consider that this is a critical part of the Draft NPF 4, but it is an area where the detail has remained unresolved despite much previous research and consultation.

A new onus has been placed on Planning Authorities which requires an emphasis to be placed on an Infrastructure First approach with delivery programmes and responsibilities clearly set out.

Fundamentally, there is still a serious mismatch between funding streams for this to be an effective approach unless the Scottish Government can commit to more certainty and intervention when funding is beyond the scope of Councils and developers.

HOPS support the linkages to other national infrastructure strategies e.g., the Infrastructure Investment Plan and the National Transport Strategy 2 but feels that there needs to be better and more focussed integration at national level. This is a critical area where the lack of a Capital and Revenue Delivery Plan is detrimental.

HOPS feel strongly that an agreed national approach and solution is required to deliver front-loaded infrastructure in a timeous manner, which removes financial risks at the local level.

Policy 9: Quality homes

Q31: Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

Yes.

HOPS consider that this lengthy and multi-layered policy is critical to the success of other policies linked to energy, sustainability and place making in particular.

HOPS welcome the concept of Quality Homes and supports the move to a more flexible and locally based approach to the new Minimum All Tenure Housing Land Requirement (MATHLR).

HOPS consider that generally in Draft NPF4 there should be better integration with Building Standards requirements and the linkages should be set out more clearly. E.g., housing standards, new energy requirements.

Overall HOPS consider that there are still some areas where definitions and terminology need to be further clarified and explained to avoid the ongoing disputes about “targets” and “requirements”.

Policy 10: Sustainable transport

Q32: Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

No.

The policy cannot reduce the need to travel as it will depend on decisions taken and actual implementation e.g., public transport investment and travel pricing (inc. roads) are more likely to achieve that.

HOPS support the general premise set out here for developments which generate a significant increase in person trips, but the approach adopted seems to over-simplify the complexity of the problem.

References to 20-minute neighbourhoods, place-making and local living are all commendable but difficult in practice to deliver depending on local circumstances.

Guidance referred to in this policy is also outdated (Development Planning Transport Appraisal Guidance 2011) and in need of much revision due to the research data now available on decarbonisation, travel choices, personal mobility etc.

HOPS welcome the reference to Sustainable Travel and the Investment Hierarchy in the policy but considers that greater clarification is needed for terms such as “significant increase” and “significant prosperity”. It would also be helpful if these elements were included in the NPF or in the policy.

Policy 11: Heat and cooling

Q33: Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

Yes.

This approach is welcomed but it is clearly a developer and construction sector lead role.

HOPS support the key links set out with Local Heat and Energy Strategies and the role envisaged for Heat Networks Partnerships and sees this as a critical cross-cutting role to support the professions working across the built environment, but Draft NPF4 should go further and be more ambitious in looking towards a whole systems approach to energy.

HOPS consider that the omission of references to Building Standards and the relevant mandatory requirements is a serious omission. This policy needs to set out clear linkages to Building Standards and the requirements on heat and insulation efficiency, passive and natural solutions and design concepts.

Policy 12: Blue and green infrastructure, play and sport

Q34: Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

Yes.

HOPS support the emphasis placed on blue and green infrastructure and particularly the elements related to children’s play and its integrated design.

There are clear linkages in the policy content, but blue and green infrastructure should not be in the same policy as “sport and play”

These are seen as key strands in the protection of natural resources and investment in new facilities which will provide opportunities for improving health and wellbeing.

Policy 13: Sustainable flood risk and water management

Q35: Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?

No.

The policy cannot ensure that places are resilient to future flood risk and make efficient and sustainable use of water resources, but it can encourage, promote and facilitate these actions.

The updated policy on flooding and water management is welcomed by HOPS and it naturally relates to the previous policy section on blue and green infrastructure. It is noted however that this policy appears to work against the Masterplanning Principles which Clydeplan have agreed with SEPA and HOPS would like to see this position clarified to avoid any confusion.

The management and control measures for mitigating future flooding episodes is a critical element in the climate emergency and it needs to be given greater priority and resources.

Policy 14: Health and Wellbeing

Q36: Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

No.

The policy cannot ensure that places support health, wellbeing and safety and strengthen the resilience of communities, but it can encourage, promote and facilitate these actions.

HOPS strongly support the new policy approach on Health and Wellbeing but appreciates that it is a complex, cross-sectoral issue where Health Impact Assessments will be of assistance. The precise role of Planning Authorities in this process needs further clarity as it may well require further upskilling of staff and new areas of expertise to be developed.

HOPS is pleased to support the inclusion of the “wellbeing concept” but recognise that it is an emerging strand of planning, but we feel that Draft NPF is rather light on this aspect and lacks any robust content. This is a critical missed opportunity.

HOPS is concerned, as with some other policies, that there is a mixing of elements which are linked to policy direction in plan making, and other elements which relate directly to

development management criteria. Better clarity and distinctions throughout the NPF would be helpful.

Policy 15: Safety

Q36: (repeated): Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

Yes.

This policy is supported by HOPS, but it is limited, as it only relates to safety close to major hazard sites.

HOPS consider that there is a missed opportunity here to link safety considerations into other policies e.g., design policies and the 6 qualities of successful places.

Again, there is no reference to the important role which Building Standards play in relation to safety measures in and around developments.

Productive Places Policies

Policy 16: Land and premises for business and employment

Q37: Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

No.

The policy cannot ensure places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy but it can encourage, promote and facilitate these actions.

Land use planning decisions and the investment in new business and economic development opportunities are inextricably linked and this section would benefit from being strengthened to set out the synergies between planning and business and employment. This is particularly the case in the light of the National Strategy for Economic Transformation which needs to be aligned with the Draft NPF4.

HOPS note that the employment land does not have the same level of guidance and methodology as housing does and this is regrettable.

Policy 17: Sustainable tourism

Q38: Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

Yes.

HOPS support the policy emphasis on sustainable tourism whilst recognising the conflicts and tensions between the environment and the economy.

HOPS consider that the guidance for Local Development Plans could be strengthened and local planning authorities should be given the scope to determine the spatial strategy for tourism and visitor infrastructure (particularly in rural areas), and also be given a role in identifying areas of pressure. This would support criteria 'a' and ensure criteria 'c' is not left to the development management process without a wider approach.

The introduction of the short-term lets policy will have significant resourcing challenges for Planning Authorities, especially in enforcement and monitoring terms.

It will be for individual Planning Authorities to consider the need and impact of short-term lets policy.

Policy 18: Culture and creativity

Q39: Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

Yes.

Whilst supporting the new policy on culture and creativity HOPS recognises the practical issues faced with making provision for public art and encouraging creative and cultural issues.

The agent of change principle is also an area of concern to many Planning Authorities, particularly in mixed use and large urban areas.

Policy 19: Green energy

Q40: Do you agree that this policy will ensure our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045?

No.

The policy cannot ensure that our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045 but it can encourage, promote and facilitate these actions.

HOPS support the concept of green energy but considers that this section can be strengthened and clarified better, and the definition of “unacceptable” impacts requires further clarity. There are other policies in the Framework which appear to be set against this approach and HOPS would like to see better integration of relevant policies.

Scotland’s ambitious 2030 50% target is ambitious, and it would be helpful if the Scottish Government set out what the country’s capacity is for additional wind farms before setting any targets, particularly in the light of Part c of the policy which does not support windfarms in designated areas.

Policy 20: Zero waste

Q41: Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

Yes.

The requirement for Local Development Plans to identify new locations for new infrastructure and support development in line with the national hierarchy is supported by HOPS but this is another area where cross-sector and cross-agency working will be crucial and there is a key co-ordination and leadership role for the Scottish Government needed to assist local authorities.

Similar to many of the policies in this part of the NPF, beyond the planning processes and policies, the implementation and delivery aspects rely heavily on other plans and initiatives.

Policy 21: Aquaculture

Q42: Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?

Yes.

HOPS support this new policy approach. However, this is a specialist area of planning which impacts on only a few Planning Authorities, but it is resource intensive and generates a low fee level. Coupled with the technical aspects and expertise it requires careful and sensitive management.

Policy 22: Minerals

Q43: Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

Yes.

Minerals planning is a specialist area of planning requiring specific skill sets and expertise, which many local authorities do not have. HOPS support the updated policy and is pleased to note that the extraction of fossil fuels is not supported, except in exceptional circumstances. This needs further clarity and better definition to assist the development management decision making processes.

Policy 23: Digital infrastructure

Q44: Do you agree that this policy ensures all of our places will be digitally connected?

No.

The policy cannot ensure that all of our places will be digitally connected but it can encourage, promote and facilitate such actions.

HOPS consider that this is a critical area for further promotion and expansion to assist Planning Authorities in dealing with future data and mapping demands and to make planning processes more efficient and customer friendly.

HOPS supports the policy requirement to require proposals to incorporate universal and future - proofed digital infrastructure, whilst recognising this is a fast- developing area and specialist area which needs to be accompanied by sufficient investment and delivery, as set out in the Infrastructure Investment Plan and the Digital Fibre Network. In the years to 2045

this will be an ever-expanding activity which needs to be fully supported by the relevant public/private sectors.

Distinctive Places Policies

Policies 24 to 27: Distinctive places

Q45: Do you agree that these policies will ensure Scotland's places will support low-carbon urban living?

No.

The policy cannot ensure that Scotland's places will support low-carbon urban living, but it can encourage, promote and facilitate such actions.

This is a complex area of policy which HOPS broadly support but it is seeking further clarity and commitment from the Scottish Government, relating to housing in town centres, the move away from out of town centres, and the renewed focus on strengthening local, town and city centres, through the Town Centre First Principle and other ongoing projects. This is a difficult process to manage which requires buy in from not only local authorities but Key Agencies and other stakeholders, this will have various consequences for existing sites and infrastructure which will need to be sensitively managed over time.

Distinctive Places are often identified by the way a place looks and feels but the policies set out are largely about land use.

Policy 28: Historic assets and places

Q46: Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings?

Yes.

HOPS support this updated policy area but recognises that it needs to be balanced against other policy requirements set out in the Framework. The different balance and weighting needs to be further clarified for the decision makers.

Policy 29: Urban edges and the green belt

Q47: Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

No.

The policy cannot ensure the increase of density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely, but it can encourage promote and facilitate such actions.

HOPS support this policy update but feels it is an area which is less well defined, and it is an area of general confusion by many external stakeholders e.g., the purpose and concept of a green belt is often misunderstood and misinterpreted. This section would benefit from further clarity.

Policy 30: Vacant and derelict land

Q48: Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

Yes.

HOPS support the bulk of this policy but has comments on the criteria listed.

HOPS consider this updated and expanded policy section to be critical for the way forward for future developments as it will enable more greenfield land to be protected and underused land to be developed. It is a further area of complexity related to site costs, land ownership and land values, investment and incentivisation and it deserves to be promoted and elevated to a new policy direction at national level.

Of key importance will be the Delivery Plan on how unviable or too high-risk sites can be brought forward. HOPS consider that Compulsory Sales Orders should be considered.

Policy 31: Rural places

Q49: Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

No.

The policy cannot ensure that rural places can be vibrant and sustainable, but it can encourage, promote and facilitate such actions.

HOPS consider that this part of the Policy Framework to be rather weak, and it is not positive or ambitious enough. There is an obvious and possible understandable bias towards urban policy concepts throughout the Draft NPF4, but the Scottish Government has set out elsewhere an ambitious agenda for rural areas, including their re-population and we feel that this policy direction needs to be strengthened and given more of a rural and Islands specific approach.

HOPS has identified related policies elsewhere in Draft NPF4 (Tourism and Protection of Landscape Character) which could usefully further develop in this Policy.

HOPS consider that Draft NPF4 does not refer sufficiently to Scotland's islands and their particular characteristics and challenges.

Policy 32: Natural places

Q50: Do you agree that this policy will protect and restore natural places?

Yes.

HOPS broadly support the new policy approach set out but there appears to be policy conflicts with Policy 19 on Green Energy, and this requires clarification. As with most planning policies a balanced approach needs to be taken and for example, the balance between environment, economic and energy needs with the further development of on shore windfarms, needed for future self-sufficient energy requirements and targets.

Policy 33: Peat and carbon rich soils

Q51: Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

Yes.

HOPS support this updated policy in principle acknowledging that it is another specialist planning area which requires precise expertise and skill sets.

Policy 34: Trees, woodland and forestry

Q52: Do you agree that this policy will expand woodland cover and protect existing woodland?

No.

The policy cannot ensure the expansion of woodland cover and the protection of existing woodland, but it can encourage, promote and facilitate such actions.

HOPS support this updated policy as it will complement the overall policy direction for increased protection and promotion of biodiversity interests and habitats and nature in general.

HOPS feel that there are opportunities to expand this policy guidance to include more urban trees and landscaping, forestry management for tourist, social and economic purpose, and an overall, strategic national approach to new tree planting in our previous native woodlands. As currently worded, it is rather weak and poorly worded and will be difficult to implement from a development management perspective.

The concept of assessing carbon sequestration is complex and specialist and is not currently funded – some local authorities may not have the skills and expertise to provide this in-house and will require to outsource.

Policy 35: Coasts

Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

Yes.

HOPS support the updated policy approach and considers that this is another critical area for attention and promotion, particularly the need for coastal protection measures to combat climate change. The emphasis on minimising developments in the undeveloped coastal areas is supported although the caveats attached to this policy, - blue economy, net zero and communities and the economy – need to be clarified further to assist decision makers.

HOPS support the use of Shoreline Management Plans as a part of the coastal development planning process.

HOPS consider that the approach set out can be further strengthened by requiring developers to submit evidence that a coastal location is required and alternatively, where a development is required in an undeveloped coastal area.

Part 4 – Delivering our Spatial Strategy

Q54: Do you agree with our proposed priorities for the delivery of the spatial strategy?

Yes, in principle.

Q55: Do you have any other comments on the delivery of the Spatial Strategy?

HOPS agree with the 5 proposed priorities but we consider that, although this section is the shortest section in Draft NPF4, it is the most critical part to clearly set out both the Capital and Revenue funding implications for all stakeholders. Its omission at this stage in the process is serious and substantially weakens the Draft NPF4.

HOPS appreciates that it is difficult to finalise all budget information at this stage, but we would have preferred to have seen estimates to be able to identify any early areas of concern or omission. Whilst appreciating that the Final NPF 4 will set out this financial detail it is a missed opportunity at this critical consultation stage.

a) Aligning Resources

This is a crucial aspect of how a radical and ambitious strategy can be effectively delivered by the practitioners tasked with that management and delivery. It is not just about “planners” but all the essential internal and external inputs from other professionals, including, for example other local authority services, Key Agencies, investors and developers and central government departments who provide infrastructure and built development.

Alignment of resources is key, and it must include alignment of other plans and strategies and also their respective timescales, which hopefully will become clearer in the next version of the Delivery Plan. Draft NPF4 needs to set out a clear Capital and Revenue Investment Programme, the Monitoring processes involved and what additional resources are to be invested in planning services throughout Scotland who are already taking on the burden from the work generated by the Planning Bill which imposed 49 new, unfunded duties.

Any capital investment must be aligned with the associated revenue expenditure, particularly at a time when local authority budgets are challenging, a decade of under investment in planning resources, and there is a nationwide shortage of planners.

The Draft NPF4 introduces many areas requiring specialist skills and areas of expertise which will require additional funding for re- skilling and up-skilling, but even then, there is likely to be a strong need for external expertise for a range of assessments set out in the Draft. HOPS consider that Scottish Government should undertake a review of the new skills needed to deliver NPF4.

Timescales and timing issues are key elements in a successful delivery programme as well as clarity on the respective roles and funding streams available from central and local government, multi- agency, private sector, and partnership arrangements.

HOPS consider that Draft NPF4 must align with the Programme for Government and there also has to be alignment to different legislative frameworks.

b) Infrastructure First

HOPS strongly support the “Infrastructure First” approach but discussions on this issue and the related work on the possibility of introducing an “Infrastructure Levy” in the Planning Act, or similar have been ongoing for some time and the work has not yet been completed. This is regrettable and this lack of clarity and certainty on funding is critical. HOPS remain concerned that this has been an outstanding aspect of Government policy for many years, and yet delivery of infrastructure is often the key challenge to delivering development, particularly in areas of lower land values.

Critical questions remain such as where is the incentive? How will this be imposed? Who pays? and Who delivers?

Very often the quantum of infrastructure funding required can only be provided by the Scottish Government and the funding criteria for this need to be set out.

This is clearly a matter which requires a real partnership approach and particularly with the private sector who need certainty in advance of what is required from them and when. Many different local solutions have been applied to this thorny question and it is essential that all the best practice and experiences from both public and private sectors are brought together when this matter is finalised by Scottish Government.

Whilst HOPS support the Infrastructure First approach there is a lot of fine detail and certainty yet to be provided to assist all stakeholders. Our concerns include the relationship between planning and legal agreements and requirements, delivery models, availability of national upfront funding, and the balance between capital and revenue funding streams. These are all recognised as critical areas for focus requiring clarification.

c) Delivery of National Developments

There are high expectations for successful outcomes and the delivery of these National Developments. Of necessity it will involve positive collaboration between all the key partners within local and central government, key agencies, investors and developers, and again the precise delivery mechanisms need to be set out in the next Draft.

Draft NPF4 and previous NPFs do not have a specific delivery budget and largely restates existing commitments. Again, there is an urgent need for clarification and certainty over the definition of “national”, particularly across the “thematic “proposals, across an Action Area and it would be beneficial to explore how the various RSS areas can be complementary.

HOPS also note that the NPF4 Delivery Programme also needs to consider the delivery of sites beyond those listed as National Developments. Given the potential lifespan of the NPF4 this is of particular concern as new sites may come forward which may be of significance.

HOPS do have a concern that the Delivery Programme for National Developments appears to be a bit of an afterthought at this stage in the process and there are concerns about the reality of delivering some of these projects, the complex manner National Developments are set out in Draft NPF4 and some of the wording appears rather weak e.g., “we will”.

HOPS support the delivery of National Developments in a planned and coordinated way providing there is an agreed set of roles for the different stakeholders, funding and timing is put in place and there are clear monitoring and updating procedures put in place for the Scottish Government to implement. HOPS are not responding to any individual developments as this is more appropriately a matter for individual local authorities and partnerships to comment on.

d) Development Plan Policy and Regional Spatial Strategies (RSS)

HOPS do not consider that there is any further clarity set out in this section on the role of RSSs in terms of their relationship to the delivery of NPF aims and LDPs and clarity is required.

There is a lack of a coherent organisational chart within the documents which sets out the context, roles and interactive relationships between the key documents and strategies. This is a crucial relationship and currently there is still a confusing picture, and some members feel that RSSs are being side-lined, as they sit out with the development plan and their role is not reflected in the spatial strategy.

There is a reality that RSS's require significant funding and resourcing, and this will be challenging. Work on the interim RSSs has been helpful, and we feel that this work will continue to provide more clarity on the respective roles.

HOPS consider that this is an area which is still evolving, but it supports the work being carried out by Scottish Government, local authorities and RSSs on the interim RSSs as this has been helpful and constructive. HOPS consider that this ongoing work will continue to provide more clarity on the respective roles and be able to set out a clear, functional and operational role for RSS's which is complementary to both the NPF and the LDPs.

e) Monitoring

Monitoring is seen by HOPS as an essential part of the NPF process, but it will be a significant and challenging task. This requirement must be led and undertaken by the Scottish Government as the coordinating authority. It is not the role for local authorities. Whilst Planning Authorities will engage, their resources will be focused on Local Development Plan monitoring processes. In this vein, the reference made in Draft NPF4 to “local monitoring” needs to be clarified.

To be successful effective monitoring needs to be based on clear targets set against an Evidence Report and regular updates are required, perhaps on an annual basis, in the form of a Delivery Programme and Annual Monitoring Report or similar, and it needs a real awareness of what the success criteria are which are being measured.

HOPS recognise the importance of effective monitoring of all plans and the NPF is no different in that regard. The different monitoring roles of central and local government need to align, and a consistent methodology adopted to provide a “best fit” approach to avoid duplication of resources. What factors will trigger NPF 4 being amended is also seen as a crucial element. HOPS look forward to seeing an expanded section on Monitoring and Delivery in the finalised NPF4 which takes account of these suggestions as set out in the Business and Regulatory Impact Assessment (BRIA) under Question 70 and we reiterate our desire to be involved with the Scottish Government in this process.

Part 5 - Annexes

Annex A: Outcomes Statement

Q56: Do you agree that the development measures identified will contribute to each of the outcomes identified in Section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

Annex A details the NPF4 Outcomes Statement which sets out the 6 outcomes identified in the planning legislation.

HOPS has no specific comments to make on the connections and policy interactions identified but would like to continue to stress the need for clearer policy wording which needs to be “fit for purpose” in planning decision making and needs to be fully supported by Scottish Government and DPEA in their decision- making processes to back up the decisions made by local authorities.

Policies on their own cannot guarantee delivery of development but they can be used to shape the approach to be taken to individual development proposals to assist in clarity and guidance in advance to the development sector.

Planning services are not sole custodians of some of the high-level commitments on climate change and zero carbon, for example, and the different roles and responsibilities may need to be made clearer. In many cases planning services will only be able to contribute in a minor and supportive way and it will require the collective efforts of all relevant stakeholders to ensure that the objectives of the Spatial Strategy and the policy aspirations set out in Draft NPF4 are achieved.

Annex B: Housing Numbers

Q57: Do you agree with the Minimum All-Tenure Housing Land Requirement (MATHLR) numbers identified above?

Yes.

This Annex refers to housing numbers for Local, City Region and National Park authorities and the HOPS view is that it is more appropriate for housing numbers to be commented on by individual authorities.

We have provided further comments about housing quality and delivery in Part 3.

Annex C: Glossary of Definitions

Q58: Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

HOPS do not consider that the definitions set out in the Glossary are comprehensive or complete and some of them require a better and tighter definition. HOPS have identified the following definitions in need of further clarity;

- **Affordable housing** – Given the emphasis in the NPF on the need for high quality development proposals surely the definition should not state that affordable housing is "Housing of a reasonable quality".
- **Brownfield** – Should the definition exclude agriculture, forestry and previously used land which now has nature conservation or recreation value.
- **Deliverable Land** – It also mentions 'the pipeline period' in its own description?
- **Sustainable Development** – Definition needs to be improved as it is too general and open to interpretation.

HOPS has identified the following terms which would benefit from being added to the Glossary of Definitions;

- **20-Minute Neighbourhood**
- **Accessible** – Scottish Government seems to be using the definitions contained in its Scottish Urban/Rural Classification, but this refers to Part C Guidance Section 3 Page 72 Paragraph 303 which confirms areas are accessible if they are within 30 minutes of a "Major Urban Area"
- **Adaptable**
- **Additional Requirements**
- **Balanced Development**
- **Community Wealth**
- **Compact Growth**
- **Cultural Identity**
- **Culturally Important**
- **Deliverable Housing Land Pipeline**
- **Dense Urban** (potentially with the setting of minimum density)
- **Fair Work**
- **Future Functional Floodplain**
- **Green Economy**
- **Green Jobs**
- **Housing Target** – confusing approach taken to Housing Target and a Housing Land Requirement in Policy 9a
- **Just Transition**
- **Nature Positive**
- **Nature Positive Economy**
- **Negative Emissions Technologies**
- **Net Economic Benefits**
- **Pipeline for housing development**
- **Prime Agricultural Land**
- **Rural and Urban Synergy**
- **Rural Area**
- **Rural Places**

- **Significant Emissions**
- **Significant Weight**

In addition to the points listed above HOPS also note a confusing approach to responsibilities for the NPF and the Local Development Plan e.g., *“Local Development plans should identify a housing target for the area it covers, in the form of a Housing Land Requirement. Representing how much land is required, it should at least meet the 10-year Minimum All-Tenure Housing Land Requirement (MATHLR) set out in Annex B.”*

Section (a) mentions *‘Housing Land Requirement’* and, along with the *‘housing target’* assigns this as a task for the LDP. Unfortunately, the Glossary description contradicts that when read in context with Policy 9(a). It says this is set by the NPF instead.

Integrated Impact Assessments

Environmental Report

Q59. Environmental Report. What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

HOPS have no detailed to comments to submit on the Integrated Assessment Environmental Report which extends to 417 pages as it is comprehensive and covers all the relevant aspects.

Q60. Environmental Report. What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.

No comments to make.

Q61. Environmental Report. What are your views on the potential health effects of the proposed national developments as set out in the environmental report?

No comments to make.

Q62. Environmental Report. What are your views on the assessment of alternatives as set out in the environmental report?

No comments to make.

Q63. Environmental Report. What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

No comments to make.

Society and Equalities Impact Assessment

Q64. Society and Equalities Impact Assessment. What are your views on the evidence and information to inform the society and equalities impact assessment?

No comments to make.

Q65. Society and Equalities Impact Assessment. Do you have any comments on the findings of the equalities impact assessment?

No comments to make.

Q66. Society and Equalities Impact Assessment. Do you have any comments on the findings of the children’s rights and wellbeing impact assessment?

No comments to make.

Q67. Society and Equalities Impact Assessment. Do you have any comments on the fairer Scotland duty and the draft NPF4?

No comments to make.

Q68. Society and Equalities Impact Assessment. Do you have any comments on the consideration of human rights and the draft NPF4?

No comments to make.

Q69. Society and Equalities Impact Assessment. Do you have any comments on the islands impact assessment?

No comments to make.

Business and Regulatory Impact Assessment

Q70. Business and Regulatory Impact Assessment. Do you have any comments on the partial business and regulatory impact assessment?

HOPS acknowledge that a partial Business and Regulatory Impact Assessment (BRIA) has been prepared by the Scottish Government and the recognition that NPF4 is likely to have some impact on all business sectors across Scotland who engage with the planning system through the submission of planning applications.

The most significant impacts will be on those businesses that are dependent on the planning system for identifying new sites for their ongoing operations including, house builders and developers, the renewable energy sector, digital network providers and the minerals and aquaculture sectors.

HOPS would like to see a similar exercise undertaken for Scottish local authorities which would set out the financial and resource impacts for all Councils. There is always an assumption made that these impacts will be cost neutral, but experience shows that this is not the case.

HOPS do not consider that the high-level assessment outcomes set out are likely to be as specific as they have been narrated:

- the identification of national developments and development management policies that are being put in place to support the spatial strategy.

- greater certainty to developers because it establishes the need for development, although additional costs may be associated with progressing proposals through the planning system.
- the introduction of national planning policies which form part of the development plan will provide greater certainty to developers and considerably reduce the number of occasions where they will need to engage with the planning system on the development of policies that affect their businesses.

HOPS is pleased to note the intention of the Scottish Government to work with a range of stakeholders to develop an appropriate Monitoring Programme for NPF4 that allows us to assess progress and act where required. Monitoring will be required at both a national and local level and will need to be proportionate and effective.

HOPS is also pleased to note the references to the monitoring programme will complement, and potentially combine, wider planning performance work including Planning Performance Frameworks and Royal Town Planning Institute work on monitoring outcomes, as well as reflecting national outcomes set out in the National Performance Framework.

HOPS would like to be involved in this proposed monitoring process.

HOPS support the production of a Post-Adoption Statement which will reflect on the views provided on the findings of the assessment and the proposals in the Draft NPF4 and will explain how the comments received were taken into account.

HOPS consider that it would have been more helpful to all stakeholders if some of the detailed content in the Regulatory Impacts had been referenced in the Draft NPF 4. This particularly relates to the overall vision to 2045 and for example, the references to;

- the impacts of Brexit – Brexit Referendum 5-year Summary Impacts ¹
- the economy and global trends for the Scottish economy²

Both these points relate to HOPS earlier comments on the gap in the NPF 4 for some key economic and population indicators looking 20 years ahead to 2045. This is a significant gap in setting the national context for a 20-year vision.

Heads of Planning Scotland
March 2022

¹ <https://www.gov.scot/publications/brexit-vote-5-years-know-far/>

² <https://www.scottish-enterprise.com/learning-zone/research-and-publications/components-folder/research-and-publications-listings/economic-commentary>