



## **Scottish Government**

Written consultation response

# **Scotland's National Planning Framework 4 (NPF4) Position Statement**

The Scottish Council for Development and Industry (SCDI) is an independent and inclusive economic development network representing all sectors and all geographies of the Scottish economy. Our mission is to convene our members and partners across the private, public and third sectors to collaborate to deliver inclusive and sustainable economic growth for the benefit of all.

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# Scotland's National Planning Framework 4 Position Statement

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

The National Planning Framework 4 (NPF4) represents a decisive opportunity to ensure that Scottish Planning Policy is fit for purpose to deliver a just transition to net-zero and maximise 'clean growth' benefitting people, economy and planet.<sup>1</sup> We agree that planning for net-zero emissions should be an essential and overarching priority for NPF4. This priority runs through all four overlapping objectives set out in the Position Statement.

Planning will have to play a significant role in transforming our places to decarbonise our economy and our society. Scottish Planning Policy needs to be more ambitious to achieve net-zero and deliver a nature-rich future for every citizen and every community in an inclusive and fair way. It should be visionary and plan-led to provide greater certainty and consistency, maximising its potential as a positive tool for clean growth. We support the need to ensure that climate change is a guiding principle for all plans and decisions in all of Scotland's communities.

NPF4 should raise development standards, deliver positive effects for biodiversity and align with Scotland's legal emissions targets and the Climate Change Plan update. NPF4 should result in developments which are more accessible with higher environmental, sustainability and biodiversity standards – including in relation to active travel, construction materials, energy efficiency and access to nature.

NPF4 should ensure that all development plans are aligned and consistent with Scotland's net-zero targets. As well as embedding the UN Sustainable Development Goals and Scotland's national outcomes, NPF4 should embed Scotland's existing climate targets and future nature targets, which we have called for to focus attention and action on reversing biodiversity loss.<sup>2</sup>

Stronger incentives and regulations should be in place to enhance the environmental sustainability of developments. Developments which are incompatible with Scotland's climate and nature targets should not go ahead. Planning authorities should have stronger powers to reject or reform proposals which do not meet high standards of sustainability and quality.

The presumption in favour of sustainable development should be strengthened and expanded to accelerate Scotland's progress towards net-zero. NPF4 should recognise a presumption in favour for net-zero developments within the context of plan-led development. This should apply to key projects which are essential to achieve net-zero – such as active freeways, native woodland creation, onshore wind farms, pumped storage hydro or fabric-first net-zero emissions housing.<sup>3</sup> Developers should be able to demonstrate where they will

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<sup>1</sup> [www.scdi.org.uk/policy/clean-growth-download-our-manifesto](http://www.scdi.org.uk/policy/clean-growth-download-our-manifesto)

<sup>2</sup> [www.scdi.org.uk/policy/clean-growth-download-our-manifesto](http://www.scdi.org.uk/policy/clean-growth-download-our-manifesto)

<sup>3</sup> [www.scdi.org.uk/policy/download-our-green-recovery-plan](http://www.scdi.org.uk/policy/download-our-green-recovery-plan)

integrate and add to existing sustainable infrastructure such as active travel at the same or higher quality. Solutions which bring innovative options such as large scale off-grid communities for rural areas using a mix of energy sources should be encouraged.

NPF4 should support the mainstreaming of circular economy approaches, practices and technologies across the construction and engineering sectors to reduce and eliminate waste from developments.

It is welcome that the sustainable travel hierarchy will be embedded into the appraisal and assessment of development proposals as well as the proposals themselves. There needs to be a greater shift in the spread of investment towards future-proof low- and zero-carbon transport infrastructure.

However, there will still be an overdue need to improve roads infrastructure in rural areas, which are critical economic arteries, and to increase public safety. In addition, roads infrastructure will need to be updated to facilitate the transition to Electric Vehicles (EVs) and Connected and Autonomous Vehicles (CAVs).<sup>4</sup>

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

As we look to recover from the pandemic, it is vital to build the resilience of our communities, our society and our economy for future crises and disruption, whether they are also related to public health or whether they are caused by demographic, technological or climate change. NPF4 will have to take account of the changes, not least how and where we work, during and due to the COVID-19 pandemic, because of how the crisis has changed employers' and workers' thinking about business and working practices.

NPF4 should link planning for resilient communities to Community Wealth Building strategies, given the symbiotic focus on localism and resilience.<sup>5</sup>

We support the Scottish Government's '20-minute neighbourhoods' agenda and welcome the commitment to embed it within NPF4. It may be beneficial to identify and invest in pilot locations in cities, towns and rural areas to develop the concept further in practice. 20-minute neighbourhoods will require higher levels of urban density in walkable, mixed use neighbourhoods across our towns and cities, reconnecting citizens to revitalised local assets like the High Street and under-used, vacant or derelict buildings and land, bringing jobs and employers back to our cities or re-shaping their use to attract new jobs and employers.

The Scottish Land Commission has highlighted the significant 'missed opportunity' which nearly 11,000 hectares of vacant and derelict land represents as places to build new homes, provide new business premises, grow local food, generate local energy, provide spaces for play, exercise and leisure or new sites of inward investment.<sup>6</sup>

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<sup>4</sup> [www.scdi.org.uk/ruralcommission](http://www.scdi.org.uk/ruralcommission)

<sup>5</sup> [www.north-ayrshire.gov.uk/council/community-wealth-building/community-wealth-building.aspx](http://www.north-ayrshire.gov.uk/council/community-wealth-building/community-wealth-building.aspx)

<sup>6</sup> [www.landcommission.gov.scot/our-work/housing-development/vacant-and-derelict-land](http://www.landcommission.gov.scot/our-work/housing-development/vacant-and-derelict-land)

NPF4 should support local authorities and public bodies to change their approach to land disposals to bring more sites into use valuing the wider economic and social benefits along with the disposal value. It could also as well explore ways to allow landowners and developers to spread the costs of bringing marginal sites into use.<sup>7</sup>

New residential and commercial developments should not contribute to suburban sprawl which encroaches on greenbelt land or damages biodiversity. NPF4 should protect important areas of green space and biodiversity from new developments, unless there is a highly significant economic and/or social justification. Planning must incentivise and prioritise developments which balance the natural and built environments, building in harmony with animal and plant life. We agree that developments should not lock-in car dependence, should be accessible by active travel and should be well served by public transport to ensure their long-term sustainability and resilience.

In supporting the implementation of an infrastructure-first approach, NPF4 should consider this holistically to include natural capital, such as blue and green infrastructure. For example, challenges and opportunities around water resources should consider not only flood management and prevention, but also more efficient use and supporting innovative and sustainable agricultural production.

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

We believe in a Scottish economy which works for everyone, everywhere. NPF4 should support the planning process to deliver economic and social wellbeing for all. It should support the Scottish economy to become more equal, more productive and attract more businesses, entrepreneurs and investors to create good jobs with good wages. It should have a clear focus on providing the affordable, sustainable housing which is needed to retain and attract talent and for key workers in industries and public services. It should identify and leverage new developments which will attract inward investment and increase exports.

It is important that inequalities between and within places are addressed by Scottish Planning Policy and reflected in NPF4. Inequality between regions and communities is significant, and in many cases widening, across Scotland. There are also substantial inequalities in the planning system across the country in terms of timeliness and efficiency of processes and decisions, which can exacerbate or contribute to wider social and economic inequalities in outcomes.

Depopulation continues to negatively impact many rural and other areas. Our population continues to shift over the long-term from rural to urban areas and from the West to the East. There is a need for developments which create new jobs, build affordable, quality, net-zero housing or attract inward investment in the parts of Scotland which need it most to be supported and accelerated to mitigate or reverse these trends.

Home or remote working is likely to remain a significant long-term feature of many working lives in the years ahead. Planning policy, especially in relation to housing standards, will

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<sup>7</sup> [www.scdi.org.uk/ruralcommission](http://www.scdi.org.uk/ruralcommission)

need to adapt to take account of how the era of the ‘home office’ impacts on the needs of individuals, families and communities.

It is increasingly vital to level the digital playing field across Scotland by accelerating investment in digital connectivity. Many children in deprived households have faced exclusion from learning by digital poverty. Many workers in rural and remote communities have struggled to maintain productivity with the burden of poor broadband. Ending digital poverty and inequality should be a policy priority for NPF4. It should support the completion of 100% connectivity through fixed fibre or mobile solutions for all of Scotland, bringing a wider range of providers in to accelerate delivery in harder to reach locations.

NPF4 should support co-working spaces and remote working hubs, not only but especially in rural areas. As we look to recover from the COVID-19 crisis, planning will need to balance support for reducing unnecessary travel to reduce emissions with support for infrastructure which recovers and maintains social ties through connection, collaboration and community.

Scotland faces a number of public health crises and challenges, such as the lowest life expectancy in Western Europe and high levels of urban pollution, which 20-minute neighbourhoods could be harnessed to address.<sup>8</sup> We need to address the negative impacts on health and wellbeing which places can create, as well as be more ambitious about shaping how and where we live to make a positive contribution to our happiness and quality of life.

NPF4 should support the delivery of the Scottish Government’s Export Growth Plan, Inward Investment Plan and Capital Investment Plan. It should support the tourism sector to recover from the pandemic and the growth of the visitor economy, as well as our attractiveness to investors and our exporters’ access to global markets.

Planning proposals and decisions should reflect the opportunities and interdependencies across the various sectors of the Blue Economy – from marine tourism to renewable energy to food & drink – to maximise benefits for coastal communities and identify opportunities for cross-sectoral collaboration.

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

Designing the optimum developments and investing in the right infrastructure is critical to creating better, greener places where people and businesses want to live, work and invest. The pandemic has accelerated some major spatial changes to our towns, cities and villages which have been happening for some time – such as the hollowing out of the high street; partly due to increasing numbers of out-of-town retail developments and the inexorable rise of online shopping.

There is a welcome focus in the Position Statement on exploring ways to reducing the need to travel unsustainably, including in the design and location of new developments, aligned with the 20-minute neighbourhoods concept.

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<sup>8</sup> [www.scdi.org.uk/policy/mindthegap](http://www.scdi.org.uk/policy/mindthegap)

As part of a Green Recovery, NPF4 will need to encourage and empower communities, planning authorities and developers to work together to revitalise our town and city centres by repurposing existing infrastructure and vacant or derelict urban land. There are opportunities to think and act innovatively, reimagining our towns and cities and the relationship between the built and the natural environment.

NPF4 should support our town and city centres to build a more diverse, mixed and resilient urban economy with a refreshed ecosystem of office, commercial, industrial, residential and natural space. Our town and city centres must be places for living, leisure and connecting with people and nature, as well as for working and shopping.

Our towns and cities need to build on the temporary active travel interventions which have facilitated social distancing during COVID-19. Permanent changes should be made to the way our places work and how we move around them to permanently reclaim spaces for people, building on the successes of the more limited Spaces for People programme.

Scotland's major towns and cities should develop Green Town Plans or Green City Plans with support from the Scottish Government and local partners which set out the concrete actions they will take together to reduce emissions and improve transport to create highly connected, highly sustainable places. Many of Scotland's local authorities have set net-zero targets or declared climate emergencies but still need to make difficult decisions to translate rhetoric into reality.

These holistic cross-partner plans should deliver and coordinate short- and long-term actions, from creating new parks and revitalising vacant land to expanding low-speed/low-emission zones and cycling routes. They should accelerate modal shift, apply lessons from the 20-minute neighbourhood concept and address inequalities in access to green space and public transport for a just transition.<sup>9</sup>

We need to think about how to help places recover in the short-term, but we cannot afford to miss the opportunity to bring fresh thinking about our places for the long-term. We should learn lessons from examples of best practice in other countries in moving quickly to reclaim spaces for people and for community. For example, former office space could be retrofitted to provide affordable, quality, net-zero housing, while former retail units could be part of a new national network of repair and remanufacturing workshops or new urban networks of green spaces.

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

The success of NPF4 will be in its ability to ensure its positive vision is implemented effectively at sufficient pace and on a national scale. This means streamlining the planning process to ensure planning supports rather than acts as a barrier to investment and ensuring that the burden of planning evolves to become appropriate for different sized developments. It is important that NPF4 ultimately delivers a more efficient, more streamlined, more ambitious and more appropriately resourced planning system across Scotland, which

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<sup>9</sup> [www.scdi.org.uk/policy/clean-growth-download-our-manifesto](http://www.scdi.org.uk/policy/clean-growth-download-our-manifesto)

facilitates and accelerates our progress towards a more prosperous, resilient and equal net-zero Scotland.

There is also a need to map out how national ambitions will fit together with local and regional initiatives, including City Region and Inclusive Growth Deals. This will mean, for example, ensuring local planning policies are up to date with the latest thinking on sustainability and can flex where developers may be proposing more radical but ultimately more sustainable approaches.

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

N/A.

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

The broad and welcome ambitions of the Position Statement raise critical questions about resourcing and underline the need for greater investment in the capacity and skills of the planning system and its workforce.

Planning authorities will need to be supported to develop the skills and capacity required for 'place-based systems thinking', building on the Place Principle to develop, implement and ensure compliance with more ambitious and more comprehensive strategies to achieve Net Zero and deliver a nature-rich future for every community.

Planning authorities will need to be properly resourced to meet demand as higher volumes of sometimes more complex applications come through the system. Decision-making must be more timely and more efficient, with digital technologies utilised to improve the accessibility and quality of planning applications and engagement with communities and stakeholders.

Local authorities must also have stronger powers and guidelines to reject developments which are incompatible with Clean Growth objectives.