

NPF4 Call for ideas: <https://www.transformingplanning.scot/national-planning-framework/get-involved/>

NPF4 Background, Process and High Level outcomes: <https://www.transformingplanning.scot/national-planning-framework/what-is-the-national-planning-framework/>

**Attendees:**

Eric Dawson SG  
 Leigh Johnston SG  
 Helen Stephenson SG

Hannah Garrow SG

David Wood PAS  
 Emily Wandsworth CSGN  
 Bruce Mann ALGAO  
 Diarmid Hearns NTS  
 Clare Symonds Planning Democracy  
 Cara Jones AS  
 Rob Lennox ClfA  
 Charles Strang IHBC  
 Euan Leitch BEFS  
 Andy Milne SURF  
 Iain McDowall BEFS  
 Hugh Crawford RTPi  
 Ann MacSween HES  
 Jocelyn Cunliffe AHSS  
 Tyler Lott SPAB  
 Hannah Smith ICE  
 Graeme Purves BEFS  
 Ailsa Macfarlane BEFS

At the invitation of the Scottish Government’s NPF4 planning team, BEFS were asked to invite their members to a roundtable discussion event. This was an informal opportunity to hear a little of where SG thinking sits currently, but also to engage with the team in ‘listening mode’ to consider opportunities for engagement that exist currently.

BEFS thanks the SG team for their time and expertise. The opportunity to have an informal conversation was welcomed by all those attending.

The first link (also above) has some open questions which could help to steer responses for this first investigative phase. NPF4 Call for ideas: <https://www.transformingplanning.scot/national-planning-framework/get-involved/>

These open questions are listed below (they expand significantly with additional prompts when using the online version):

- **What development will we need to address climate change?**
- **How can planning best support our quality of life, health and wellbeing in the future?**
- **What does planning need to do to enable development & investment in our economy to benefit everyone?**

- **How can planning improve, protect and strengthen the special character of our places?**
- **What infrastructure do we need to plan and build to realise our long term aspirations?**

A draft NPF4 is planned for release in September 2020 with a full, formal consultation process following. The current call is a call for ideas which allows for taking stock and shaping the future, and SG were keen to highlight collaborative working and the opportunity in this early phase for positive and constructive input to help inform the form and content of the new NPF4 (which will incorporate the SPP).

All those involved with the formation of the Planning Act will be aware, not only that Scottish Planning Policy is to be incorporated as part of the NPF4 – but that this also means the new Scottish Planning Policy will be part of the statutory Development Plan thus providing greater weight in planning decision making.

As a consequence of the new Planning (S) Act the NPF4 is proposed to have fuller regional coverage. This will be through the preparation of Regional Spatial Strategies.

As policy will be incorporated within NPF4 this will avoid any need for duplication and repetition across Local Development Plans. It will be discretionary for local planning authorities to suggest policies appropriate and necessary for their local place. It is envisaged that new LDPs will become highly spatial and more place-based.

There are many strategic aspects in relation to Scottish Government Policy which should have some bearing on the preparation of the NPF4. Some of which are listed here:

- Strategic Transport Projects Review (STPR2)
- Infrastructure Investment Plan (IIP)
- Housing 2040
- Land Use Strategy
- Climate Action Plan

There was some discussion in the room as to the primacy of strategies/policies within NPF4. The current description of the NPF is as the “spatial expression of economic strategy”. Whilst many members expressed *climate* as the key driver, it seemed clear that Inclusive Economic Growth may play a central role. Health and Wellbeing and addressing inequality were also mentioned.

Current website information suggests that NPF4 will ([as directed by the Planning Act](#)) also address the following high-level outcomes:

- Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people
- Improving the health and well-being of people living in Scotland
- Increasing the population of rural areas of Scotland
- Improving equality and eliminating discrimination
- Meeting any targets relating to the reduction of emissions of greenhouse gases
- Securing positive effects for biodiversity

Graeme Purves has been working with the Welsh Assembly on the draft version of their National Development Framework. Point from review included: considering sustainable rural living has proved a challenge, a challenge which Scotland must also address. (Urban and suburban sustainability challenges being somewhat easier to meet in principle.)

**Question:** What will happen to Planning Advice Notes (PAN)? Slimmer documents can be effective, but where will the crucial detail for day to day advice be found? PAN are seen as invaluable ‘in the field’. The

statutory nature of policies is to be championed as a stronger footing, but *practical advice* was still seen as necessary. There was discussion about how digital platforms can evolve to provide opportunities which can make available supporting GIS information/data and showcase good practice.

This is one of SG Planning Divisions key projects – see link -

<https://www.planningfuturecities.org/news/2019/5/29/digital-innovation-in-planning-insights-from-scotland>.

There was support for the slimmed down document (NPF/SPP) in principle, as had been effective in the 2010/2011 NPPF process in England.

Any BEFS response, and related sector responses, will need to clearly express ‘The Why’ for maintaining/changing/improving policy sections and also ‘The How’, as to how the sector will provide benefits across a range of policy perspectives.

Many expressed their views, and drew on community and Local Authority experience – that within NPF4 Government has an opportunity, and perhaps a duty, to show clear leadership and priorities. It was expressed that where much policy is currently a ‘should’ we could move to a ‘must’. The significance of NPF and SPP being part of the statutory Development Plan was noted in this context.

However, communities and Local Authorities will be tasked with responding to these priorities; to do so effectively they must be resourced and skilled. We cannot expect under-resourced groups of any kind, to suddenly be able to take on the mantle of responsibility without appropriate investment. The crossover between spatial and Community Planning, links with the community empowerment agenda and local governance review, and the possibilities provided by the chance to prepare Local Place Plans all featured as part of this discussion.

Professional bodies also wanted to see strategic direction and policy ambition within the document – with ambition and climate steer directives (which can currently be prevented by cost) foregrounded. Without this clear steer current economic factors, and the status quo, may win out.

BEFS role will be to express the priorities necessary for success – within the context of the climate emergency and ensuring the best outcomes for people and place.

The [purpose of planning](#) is to *manage the development and use of land in the long term public interest*. Whilst this purpose is from the Act, NPF4 should enable the *outcomes* that make that purpose manifest. How that can be expressed through this document, for the benefit of the existing built environment, will be up to BEFS and Members evidential contributions. The early ‘call for ideas’ and subsequent formal consultation on a draft NPF4 provide significant opportunities to suggest contributions and solutions to tackle climate, wellbeing and place challenges.

How we consider our current built environment, in terms of embodied energy, energy efficiency and how a low-carbon place is formed, will need to be enshrined in principles related to retaining, reusing, and repurposing – rather than replacing. This will need to include measures related to material passports, procurement and retro-fitting.

NPF4 can help to change the direction of thinking. Seeing our settlements as part of our current infrastructure helps to reinforce that maintaining and using what we have – stewardship of our places (green/blue and built) for the benefit and betterment of all, needs a planning policy expression.

The historic environment has already made some inroads into these principles through recommendations made by the Our Place in Time [Built Heritage Investment Group](#), and approved during the recent Strategic

Historic Environment Forum (SHEF), Chaired by Fiona Hyslop, MSP – Cabinet Secretary for Culture, Tourism and External Affairs. The following ‘asks’ are relevant to all, not just ‘traditional’ or ‘historic’ structures.

***Changes to taxation structures for traditional buildings:***

*The Scottish Government to consider using existing powers, or where appropriate to lobby for change in relation to:*

*Incentivisation for use and reuse of traditional buildings through income tax powers. A previous example being the HMRC, Business Premises Renovation Allowance (2007-2017).*

*Enabling, through conservation and continued use, the full potential of Scotland’s built heritage asset by removing unequal application of taxation and VAT on restoration, maintenance and conservation works, whether through graduated relief or other fiscal incentives.*

***New Policies and Standards for Climate Change Adaptation and Mitigation for the built heritage including development of appropriate measures for carbon, embodied energy and energy efficiency emergency:***

*The climate emergency demands careful stewardship of our precious resources. The Scottish Government to consider introducing policy to incentivise a culture change, driving maintenance, retention, reuse and repurposing of existing heritage assets rather than the current default to ignore, replace or dispose of them.*

*Recognise and develop a measure for the embodied energy in our existing built environment when considering development and repurposing options.*

*Recognise the unique challenges and limitations of the current assessment for energy efficiency improvements to traditionally constructed properties; energy efficiency is rarely assessed in ways which reflect the true benefits of these construction techniques. Review how built heritage assets are assessed and develop more appropriate assessment EPC tools for traditionally constructed properties.*

The National Performance Framework (and UN Sustainable Development Goals) helps to steer NPF4 – planning is a filter, we cannot force an individual to take an action, but we can incentivise and regulate accordingly.

Current thinking within SG is that Scottish Planning Policy topics might be structured according to a framework of three overlapping and cross-fertilising policy headings - Work, People and Place - within an overarching consideration of addressing the climate challenge.

How we square the tensions between economic growth and climate change will be central to the formation of the document.

Policy direction and clear ambition is needed from Government. A question arose around, what is the status of the National Developments identified and are they going to change? It was observed that planning is being brought up often at the Citizens Assembly.

Historic Environment Policy for Scotland (HEPS) – is a policy statement directing decision making that affects the historic environment in Scotland. It is possible that an ‘ask’ from the sector could be to incorporate HEPS into SPP and therefore, within NPF4, making HEPS statutory. This is a discussion that SG and HES are happy to consider further.