

## Response to Scotland's 4<sup>th</sup> National Planning Framework Position Statement: 16.02.2021

The SLA are broadly supportive of the NPF4 Position Statement and make the following comments to contribute positively its further refinement. We welcome the opportunity to continue to collaborate and would be happy to take part in any future workshops.

### Q1. Net Zero Emissions

Delivering on net zero emissions will result in change in Scotland – both large and small scale and in rural and urban areas - and with that will come potential conflicts whether through retrofitting, afforestation, renewable energy and its infrastructure, flood management etc.

- a) We need to actively manage and design for change holistically and with joined up policies. We welcome the preparation of a **National Spatial Strategy** if this clearly demonstrates a holistic view on infrastructure, landscape and land use that impact on land, people, nature and place, and delivers on the equitable, effective and managed use of all Scotland's land.
- b) **Terminology** – clear definitions are required within NPF4 and between all policies and strategies on natural capital, landscape, green space, environment, woodland planting, blue-green networks, green infrastructure, ecological networks and a statement as to all the societal benefits they can bring. For example woodland planting can be seen as a monoculture of coniferous planting with restricted benefits or mixed native species that bring greater community, biodiversity, economic and health and wellbeing benefits
- c) **Avoiding conflicts: ensure landscape and place-based approaches** to land use planning and management which offer the potential to reduce land use conflicts (particularly between traditional land uses and new climate change interventions) and to deliver sustainable long term solutions. Ensuring landscape forms the basis of all new infrastructure by developing **National indicators for landscape** and reporting on national indicators within the National Performance Framework.
- d) Expanding the use of **Natural Capital accounting** would inform asset management and investment decisions around infrastructure and development.
- e) **Multifunctionality - diverse, high quality, well designed, equitable** and well managed places have the potential to deliver climate change mitigation and adaption, **to increase the resilience** of our communities and businesses to the impacts of climate change and to protect and positively enhance nature. To encourage this:-
  - **Develop policies, controls, incentives and support schemes to drive the delivery of a multifunctional approach to landscape by landowners and/or developers to meet climate change**, biodiversity net gain, health and wellbeing, net zero carbon and housing targets and help resolve land use conflicts.
  - **Embed the proper design, management and effective use of all landscapes** (rural and urban) into the statutory climate change, biodiversity, health and economic duties of all public sector bodies.
- f) **Protected Landscapes** – we welcome commitment to protect National Parks and National Scenic Areas. However given the potential impact with the requirements for Net Zero emissions on our most precious landscapes we believe that a new statute based on best international practice should be developed setting out a basis for protection for the public good.

## Q2 Resilient Communities

- a) **We welcome the inclusion of high quality design and quality green space** . To enable this to be monitored effectively **appropriate Landscape quality standards and indicators** need to be defined to ensure delivery of positive health and wellbeing, environmental outcomes to address climate change action and biodiversity, and inclusive growth and reduced inequalities.
- b) In addition a new mechanism for the collection and collation of **landscape data** to properly embed landscape thinking in the revision and digital transformation of Scotland's planning system
- c) Recognise **good practice** in decision making by promoting and supporting programmes that recognise, accredit and reward good practice in design, delivery, management and use of quality landscape.
- d) We welcome the inclusion of **natural infrastructure** and blue and green infrastructure in developments. This could be further strengthened by ensuring it is defined and **included in the definition of an infrastructure-first approach**. Landscape needs to be recognised as a vital component of infrastructure ( not just an asset) and the value it brings to climate change, health and wellbeing and our economy. This includes the value of soil/air/water/biodiversity as the building blocks as well as integrated blue / green infrastructure, whilst ensuring its character and setting is valued'.
- e) We welcome bringing forward good opportunities for quality homes, plus other uses, in places that would benefit from them, including **vacant and derelict land** and adaptation and re-use of disused properties. For this to effectively happen will need these areas **accurately mapped** and decisions about actions needed to revitalised them developed with owners and communities.

## Q3: Wellbeing economy

We agree that Scotland's many great places and exceptional natural environment, landscapes and wildlife are assets that the sector depends on, and so a sustainable, planned approach to future development will help to ensure the long term future of the industry.

- a) **Any decisions on development, land use or land management should not result in net loss of landscape quality or biodiversity**. In fact, change can be used to enhance landscape quality, offset adverse impacts and deliver biodiversity net gain.
- b) Landscape is free at the point of appreciation and use but requires investment to maintain the economic, social and cultural benefits it provides. **Landscape has intrinsic value(s) which should be recognised in asset management and evaluated and costed when changes in land use are proposed**.
- c) We welcome the commitment to build on investment through the Rural Tourism Infrastructure Fund. This should provide an opportunity to strengthen active management and incorporate landscape outcomes as requirements of new agriculture and rural development support mechanisms. **A mechanism for investing** in landscape and landscape-led design solutions will help Scotland meet its ambitious renewable energy and climate targets, whilst maintaining its reputation for quality food and drink and as a visitor destination driven by its landscape.

### Such opportunities could include

- the support of public goods through payment systems.
- offset payments as investments that return multiple benefits such as biodiversity net gain, contribution to net zero carbon emissions, caring for the historic environment, and bioeconomy focused activities.
- Mechanism (such as a levy) through which visitors could contribute to the cost of maintaining and enhancing the landscapes that they come to enjoy

#### Q4. Better Greener Places

- a) **Set fairer standards for quality green space – so there is equity to all:** Poor landscape and deprivation often occur together, meaning that those in greatest need are least able to access quality outdoor spaces. This contributes to health inequalities in Scotland. **Landscape Quality needs to be defined. Invest in maintenance and management**
- b) We note the statement *many of our existing policies on the natural environment are fit for purpose* - it is essential there is alignment in terminology ( refer to Question 1 point a)
- c) We agree that **collaborative, empowering approaches to placemaking and to local decision making will further support community resilience**

We welcome many of the points around higher quality design, the use of Scotland's natural assets, vacant and derelict land, aligning the strategy with the Land Use Strategy and identifying opportunities to align emerging Regional Spatial Strategies. There is clear overlap between Questions 1-3 and we refer you to our previous comments highlighted below

#### Question 1

- c) **National indicators for landscape defined**
- d) **Expanding the use of Natural Capital Accounting**
- e) **Encouraging multifunctionality - diverse, high quality, well designed, equitable and well managed places**

#### Question 2

- a) **Setting landscape quality standards and indicators**
- b) **Establishing landscape data**
- c) **Setting standards of good practice**
- d) **Landscape and Natural infrastructure defined as infrastructure**
- e) **Vacant and derelict land accurately mapped**

#### Question 3

- a) **No net loss of landscape quality or biodiversity** as part of change
- b) **Landscape should be recognised in asset management and evaluated and costed when changes in land use are proposed.**
- c) **Supporting a mechanism for investment**