

NPF4 Committee for Local Government, Housing and Planning – call for views

10/01/2022

Built Environment Forum Scotland (BEFS) is the umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

BEFS Statement:

In forming this response BEFS received detailed views from Members both in writing and through a round table discussion held on 06/01/2022. Representatives from the following organisations were present, as well as a range of individual practitioners:

Architectural Heritage Society of Scotland (AHSS), Association of Local Government Archaeological Officers (ALGAO), Chartered Institute for Archaeologists (CIfA), Conservation Officers Group (COG), Historic Environment Scotland (HES), National Trust for Scotland (NTS), The Royal Incorporation of Architects in Scotland (RIAS), Royal Institution of Chartered Surveyors (RICS), Royal Town Planning Institute (RTPI), Scottish Civic Trust, The Society for the Protection of Ancient Buildings (SPAB)

BEFS welcomes the committee's call for views on the draft National Planning Framework (NPF4) and commends responses by Member organisations to the committee.

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

[NATIONAL PLANNING FRAMEWORK 4 POSITION STATEMENT](#)

[SCOTLAND'S THIRD LAND USE STRATEGY](#)

BEFS Response:

Consultation and development of the draft NPF4

Please provide your views on the consultation and development of NPF4 and how this has contributed to the draft

There is general support for the consultation and the development of NPF4 as a broad and open process, the continuation of which is very much encouraged. It is noted however that whilst the opportunity to provide views is welcome, the timing and necessary rapidity of providing a meaningful collated response for this committee has been extremely tight. It is noted that consultation and Parliamentary scrutiny are running simultaneously and not sequentially, with some consternation felt as to how this will impact on the ability to take comments into account in the final drafting of the NPF4.

Please provide your views on the structure of the National Planning Framework 4 document

It is recognised that the draft NPF4 incorporates elements of previous National Planning Frameworks and Scottish Planning Policy (SPP) and that in doing so it will have been necessary to rationalise elements of both. Recognition is also given to the aim to do so with clarity and simplicity as reflected in the structure and layout. Viewed holistically however, the draft is felt to lack consistency and read-across from Parts 1 and 2 (from cross cutting themes to principles) into Part 3, which seems to stand somewhat in isolation. There is also some concern that oversimplification has resulted in omissions, such as reference to key documents and policies; apprehension is felt over lack of connection to Historic Environment policies and guidance, such as

the [Historic Environment Policy for Scotland](#) (HEPS) and other key documents reference in SPP on p.33 (or current equivalent). This lack of connection could present practical problems around implementation if not addressed. One way to mitigate this could be the reintroduction of a list of Key Documents, which was seen as an essential step to many during BEFS roundtable.

Contradictions also occur between the policies themselves; this will be elaborated on in later sections of BEFS response.

Structurally, we find the status of the different sections to be unclear, for example the section ‘How to use this document’ points stakeholders (including practitioners and decision makers) to Part 1 in order to ‘guide the preparation of regional spatial strategies, local development plans and local place plans’. This is reiterated in relation to the policies contained within Part 3, however clarity on the status of the different sections and greater use of appendices could enhance the structure, add weight to the policies, and make the document more accessible to a wide range of users. Where possible the use of Plain English is also supported, as well as consideration given to producing an abridged or easy read version of the document to encourage broader engagement and use.

Please provide your views on the incorporation of the Scottish Planning Policy and coherence of the NPF4 document overall as a roadmap

Whilst there is generally a strong read across from previous policy, BEFS notes concern that the omissions may only become clear when the document is used in practice. One notable omission is the clear list of benefits that the historic environment delivers – part of SPP, lost in this draft of NPF4, somewhat to the detriment of the historic environment’s representation as a national asset across planning and infrastructure. As mentioned, the perceived lack of connection to historic environment policies and guidance is felt to be an issue; clarity is sought on the wider policy landscape and the interrelationship of existing policies.

The inclusion of a summary section does seem, in principle, to aid accessibility. However, when the summaries are mapped against the relevant sections – such as ‘Distinctive Places’ in Parts 1 and 3 – they do not fully align. This contributes to a lack of coherence and holistic reading of the document.

Further, we would consider that **delivery** of the strategies and policies is not articulated in detail and reads as aspirational; as the document does not contain a delivery plan, we would suggest that it does not - yet - function as a roadmap.

Part 1 – A National Spatial Strategy for Scotland 2045

What is your view on the Sustainable Places section?

We would welcome an approach to all aspects of place, as outlined in the draft NPF4, to recognise the *contribution* made by the historic environment. There are concerns in relation to sustainability and the understanding of our existing environment; in not being specifically being mentioned, the historic and existing built environment is perhaps portrayed as being at odds with, rather than as part of, sustainable development.

What is your view on the Liveable Places section?

The focus on good quality homes and 20 minute neighbourhoods are felt to be excellent in principle, however clarity on what this means and how is this delivered would be welcome.

In relation to the linked policies, BEFS notes the lack of policies referencing ‘quality’ specifically. Further, quality is not apparent as linking across to Building Standards is seen as necessary to fully articulate this; NPF4 has the potential to link directly to Building Standards legislation an opportunity which is felt to be of critical importance when delivering on the aspirations set out. We would suggest to the committee that a cross-cutting approach is essential, and an important consideration will be how NPF4 can deliver on the improvements needed, to ensure buildings are safe, healthy, and fit for purpose. Another omission is any clear link and read across to additional key related strategies, such as the Scottish Government’s [Heat in Buildings Strategy](#).

Again, there exists some concern about the apparent focus on the ‘new’ and ‘creating places’, the seeming absence of our existing places - and homes in particular - as being a recognised asset and valuable part of existing infrastructure. BEFS notes that this also seems to be contra to the [Infrastructure Commission’s Recommendations](#) around existing assets and the investment hierarchy.

What is your view on the Productive Places section?

In this section Planning is tasked with some heavy-lifting as it helps to deliver the **National Strategy for Economic Transformation** (not yet released). There is some question around integration of the policies – and how NPF4 can deliver on the National Strategy given the lack of known content and delay.

What is your view on the Distinctive Places section?

BEFS welcomes the clear statements on protecting and enhancing the historic environment and safeguarding our shared heritage for future generations. However, it is unclear what weight should be given to this section within the wider planning and decision-making process - could this be clarified?

As already noted, in the draft document, the historic environment sits within 'Distinctive Places' but is not present or a focus of Sustainable, Liveable, nor Productive Places. BEFS would advocate that the historic environment should be represented, and has a role to play across the board, within sustainable development, homes, jobs and infrastructure.

In addressing this it is suggested that an example be taken from how tourism and culture are described and represented within the draft document and proposes that the same approach be taken for the historic environment. It is considered that heritage gains in the Position Statement were stronger towards full integration, adopting a benefits-driven approach in recognising the value of the historic environment - the draft NPF4 appears to step back on this previous positive approach.

The emphasis on addressing climate change throughout the draft document is noted and most welcome. BEFS suggests however that reference to the natural environment in isolation is unhelpful, rather that the ‘natural and historic environment’ should be read together. We would also suggest that the language in the different sections of the draft could be reviewed for consistency; the language in the policy section does not map the language in the principles throughout. Similarly, the draft NPF4 doesn’t currently use terminology and language found in existing policies and strategies, such as [Our Place in Time \(OPiT\)](#) and [HEPS](#), and therefore doesn’t easily read across; BEFS considers that a consistency of language and terminology enables a more joined up and coherent understanding of shared issues, towards practical implementation.

Another consideration to raise is the perceived protectionist stance regarding heritage within this section – it is appreciated that the importance of and need to ‘value, enhance, conserve and celebrate’ the historic environment is recognised, but within this the benefits of embodied energy, skills/employment and the part existing buildings and infrastructure can play in net-zero not articulated. Whilst it is essential that the historic environment is protected, enhanced and safeguarded for future generations; appropriate adaptation and management are a part of this.

What is your view on the 'Spatial principles for Scotland 2045' section?

It is generally felt that this section has good potential and clarity of vision, however the variety of principles and policies referenced make it hard to see how the vision can be manifested. It is unclear what policies/strategies take primacy and therefore what can be interpreted in practical terms.

- Part D) is of particular note – Conserving & Recycling Assets – as it does not pull through to later policy where it should.
- Compact growth – positive but places pressure on existing policies and existing places to understand what quality and enhanced growth looks like in practice.
- Improving infrastructure for tourism is mentioned but should this include infrastructure for communities; tourism does not sit in isolation? Specific reference to ‘a low carbon future for tourism’ could be amended to make explicit reference to communities, moving towards more holistic and meaningful benefit. Similar tweaks in language would deliver quick wins on multiple policy levels.
- Parts of this section read as an effort to influence regional planning but lacks clarity on how this is to be delivered. The draft does not provide any advancement or way forward for these, and assuming these are emerging strategies from indicative regional spatial strategies, more clarity and information on investment and delivery vehicles is necessary.
- Given the important role the historic environment and cultural heritage plays within our tourism industry, the definition of “environment” as used within Part C) should be expanded so that it specifically references both the natural and historic environment in order to avoid any confusion.

Do you have any other comments on the National Spatial Strategy outlined in NPF4?

- Positive section of the document but doesn’t necessarily read across to policy as strongly as it could.
- BEFS queries the length of this section and suggests that some of it could usefully be contained within appendices.

What is your view on the 'Action areas for Scotland 2045' section?

Whilst each zone may have beneficial elements within the Action areas, the largest omission is in not considering the necessary interconnectivity to truly deliver on some of the aspirations. Rail connectivity to the Northeast is not addressed, nor is the road network somewhere like Skye (an essential part of getting to some of the island locations which are mentioned). Whilst these points are not new within a policy context, NPF4 has an opportunity to foreground Action Areas within this wider context.

Place-Making and Housing Delivery

The text on quality homes in Part 3 of draft Scotland 2045 suggests that the Scottish Government favours a developer-led approach to place-making and housing delivery in which the role of the planning authority is to ensure a ‘pipeline’ of housing land to meet their needs. While Part 4 indicates potential roles for compulsory purchase and Masterplan Consent Areas in the delivery of development, the document makes no reference to the work the Scottish Land Commission on land value capture or sharing, or its recent paper [Land for Housing: Towards a Public Interest Led Approach to Development](#), which calls for the public sector to take the lead in delivering land to meet housing needs. [Future Wales: The National Plan 2040](#), the Welsh equivalent of *Scotland 2045*, accords the public sector the lead role in urban development, regeneration and the delivery of affordable housing. The Scottish Government could make a similar commitment. Meeting housing needs and creating places of quality are public policy objectives. The Scottish Government needs to empower the public sector to ensure delivery. The Scottish Government could also give substance to its commitment to an infrastructure first approach to development by recognising land value capture or sharing as an important mechanism for the potential resourcing of this.

Detailed comments:

- North & west Coastal Innovation: Mentions refurbishing but not retrofitting.
- Northern Revitalisation: mentions reuse of redundant buildings to support recovery and maintain character, but does not provide the policy to support these suggestions.
- A ‘flexible approach to planning’ referenced on p21, which ‘will help to attract investment’. Further clarity on what this means in practice is sought.
- Mention of Low Carbon future for tourism – suggest for *both* communities and visitors.
- Central urban transformation: continued demand for more homes, however, does not headline re-use and adaptation of existing building stock as part of solution.
- P35 17. Reuse land and Buildings Language here could be strengthened, “steer development away” from greenfield does not seem strong enough in a climate emergency. Actions may need more incentive, investment and direct policy supporting positive outcomes.
- Public sector led development ‘can’ shape future markets, suggest strengthening of language to ‘will shape’.
- P35 18. Talks of building and new homes **and** Infrastructure Plan but doesn’t mention current homes as infrastructure or talk about fabric first interventions and maintenance – all an essential part of meeting net zero goals.
- P43 Decarbonising homes is included at this point without referencing any related strategies – additional information as to the ‘how’ could be suggested for inclusion.

Part 2 – National Developments

Please provide your view on the developments listed as National Developments in the NPF4. Are these the right priorities?

The priorities within the developments incline towards a best-case scenario (around development, investment etc) – one query would be as to how the National Developments hold-up should the best case not come about?

Closer scrutiny as to how these priorities interact with other Scottish Government strategies and targets would be welcome, to identify conflicts between outcomes and provide clarity on how these conflicts will be managed.

Part 3 – National Planning Policy

Please provide your views on each of the National Planning Policies

Whilst the policies are well intentioned and we welcome the overall direction, we would note concern that the policies are written in a way that could lead them to be ‘traded’ due to contradictions inherent in them. Clarity of wording, and clarity of priority/hierarchy across strategies and policies should be clearly elaborated on. For example, is it intended that the Universal Policies have primacy?

Sustainable Places - Universal Policies – Policies 1-6

1. Plan Led Approach

- Whilst the Place Principle is mentioned in the preamble to this policy it feels appropriate for direct reference to be included here.

2. Significant weight should be given to Global Climate Emergency

- Lifecycle is mentioned but not embodied energy – this is an omission
- Consider that ‘Reuse’ should be explicitly stated within this policy

3. Nature Crisis

- Welcome the approach of ‘enhance, protect conserve’ for Biodiversity – and it is suggested this could be a wider approach for all of our existing natural, built and historic environment. Supporting mitigation for both climate and nature crisis.

4. Human Rights & Equality

- Query the meaning of proportionality within this context, examples to illustrate may be beneficial.
- Given ‘careful consideration’ can lack the necessary teeth as a policy for more complex decision making.

5. Community Wealth Building

- Do communities need to be resourced to be able to do this?

6. Design, quality and place

- Check with appropriate agencies and professions that policies and guidance mentioned here are up to date (e.g. Managing Change Guidance ‘New Design in Historic Settings’).
- Being designed to high quality and being built/implemented at high quality are two different things. Previous comments about links to Building Standard Legislation within the NPF4 are an opportunity which could make a real and lasting difference to people and place.

- Within the document there are times where previous knowledge is assumed. The reference to the “six qualities of successful places” is one of these. Whilst these qualities are then listed, the order and presentation of this information can be confusing to anyone who has not been embedded in the formation of the document.
- Welcome the inclusion of the historic environment and cultural heritage in **Quality 4: ‘Distinctive’** as a means of inspiration for design; and by implication heritage could be read as such within **Quality 6: ‘Adaptable’**, in particular when highlighting the need to reuse and repurpose existing buildings.

Given the positive impact the historic environment has on wellbeing, those opportunities afforded by incorporating heritage should also be highlighted in **Quality 1: ‘Designed for lifelong health and wellbeing’** with the suggested addition of the wording “...to well-designed buildings and a nature-rich **and heritage-rich** local environment...”.

- Successful Places **Quality 6** mentions ‘maintained over time’ – this policy is key to ensuring our existing environment supports net zero aims and provides quality places. The final line of **Quality 6** can also be enhanced “Reusing and repurposing existing buildings and assets **supports** our net zero ambitions and the circular economy.”

7. Local Living

- Role of Local Development Plans to support 20 minute Neighbourhoods can only be made manifest if LDPs are appropriately resourced.

8. Infrastructure First

- Current housing and existing buildings are not recognised as part of infrastructure here, as is part of the Infrastructure Commission recommendations.

9. Quality Homes

- Statement of community benefit does not appear to include involvement from the community.
- ‘High quality’ - how will this be enforced and monitored?
- As an unintended consequence - are smaller rural existing places at risk of expansion as developers take advantage of existing amenities to justify further growth?

10. Sustainable Transport

11. Heat and Cooling

- Whilst there is a focus within 11 on larger scale heating and cooling, individual decisions in relation to dwellings (informed by the Heat in Buildings Strategy) will impact on planning. The strategy should be referenced within this Policy.

12. Blue and green infrastructure, play and sport

- 12 Part D) – reference to the cultural heritage of the regional and country parks should be included in the list provided of ‘compatible with’ considerations. This should then be further referenced again in 12 Part H).
- 12 Part L) Mentions long-term stewardship of infrastructure and effective management and maintenance plans – this should apply to all infrastructure (including existing homes) and not just

blue/green infrastructure. BEFS would strongly suggest this become a universal policy. Acceptance of this as a universal policy not only supports net zero and the climate and natural emergency, but also supports and underpins much of Policy 28.

13. Flooding

14. Health and Wellbeing

- 14 Part E) is considered to be too broad with potential unintended consequences. Worst case scenario is an unsuitable development being suggested, which does have space for local food growing – and using this policy as a justification. Perhaps “consideration should be given” to development proposals including such measures.

15. Safety

16. Business and Employment

- 16 Part G) – welcome the inclusion of the historic environment in this section.

17. Tourism

It is of note that Tourism is separated from what drives tourism activity, which can provide some policy disconnects.

- ‘Tourism facility’ not defined and potentially open to misinterpretation.
- Should new tourism facilities also benefit local community with amenity?

18. Culture and Creativity

- Heritage not seen as within this productive sphere, this is felt to be an omission
- ‘Meanwhile use’ could sensibly sit within these policies.
- 18 Part D) – subclause – who is defining the loss of a venue/arts space as not of significant cultural value? Welcome the call for Local Development Plans to recognise and support opportunities for jobs and investment in - amongst other things – heritage, given the increasing desire and demand from local communities to provide spaces to celebrate their history and heritage.
- Building on this concept it would be beneficial to see Part B) expanded to include not only reference to provision of public art, but also “interpretation” to take into account other means of celebrating the history and heritage of an area.

19. Green Energy

- 19 Part F) should be changed from “...should be supported” to “...should be supported in principle” to bring it in line with other sections, for example Part I), and to allow due consideration of potential impacts that will occur in some cases.
- Welcome the inclusion within Part K) for developments to take into account “impacts on historic environment assets, including scheduled monuments, listed buildings and their settings”.

20. Zero Waste

- BEFS notes the omission of existing buildings as part of circular economy considerations.
- Welcome the requirement to reuse and recycle materials as stated in Parts B) and C) for instance, especially with statements such as “use of previously used, sustainable, local, recycled and natural construction materials”, “reuse existing buildings and infrastructure”, and “minimise demolition and salvage materials for reuse” – this will help ensure materials from historic buildings and structures are not wasted. Key to ensuring this policy aim is successful will be to ensure that reuse is appropriate, and there is scope to provide further definition of what is appropriate in either this policy or in supporting documentation for the policy.
- Welcome 20 Part E) and the inclusion of consideration of the impacts on historic environment assets.

21. Aquaculture

22. Minerals

- Welcome 22 Part D) and the inclusion of consideration of the impacts on the historic environment.

23. Digital Infrastructure

- Futureproofing is asked for here, but not within green energy for example. Same could be asked of different types of development across the document.

24. Centres

- Broadly positive approach which should continue to consider the natural **and** historic environment as inherently beneficial aspects of existing places.

25. Retail

26. Town Centre first assessment

- Acknowledges potential that there will be disagreement here – p98. Potential for the unintended consequence that economic impact could inadvertently be given primacy.

27. Town Centre Living

- Encourage and support with appropriate treatment for traditionally constructed buildings.

28. Historic Assets and Places

BEFS welcomes the opening statement of this policy which recognises the wide range of benefits which the historic environment can deliver. We support and encourage further embedding of public benefit through clear reference to the social, economic, environmental and cultural benefits associated with the historic environment’s role in creating and sustaining good places, throughout the draft NPF4.

There was broad concern specific to this policy, but also in reference to a number of others, that the language to describe thresholds of acceptability that will be needed on what affects Historic Environment could be seen as quite adversarial, and perhaps difficult to uphold whilst managing change. The phrase ‘no adverse affects’ on the Historic Environment was seen as unrepresentative of the reality, which is that we

have to *offset* negative impacts. Recommend revising the language. E.g., ‘unacceptable negative impacts’ rather than “no adverse affects”.

Recommendations for Historic Environment policy and guidance to be included within NPF4:

Whilst there is the potential for some documents (below) to perhaps be mentioned within development planning policy and legislation the (assumed) primacy of NPF4 maintains the necessity for inclusion within NPF4.

- Guidance referred to in Policy 28 includes the ‘Managing Change’ series of publications published by Historic Environment Scotland. While these are to be welcomed for the additional guidance they can provide to local authorities and developers, they are generally weighted towards mitigating the impact upon designated historic assets, rather than addressing the processes and issues encountered with undesignated historic assets which make up circa 95% of the historic environment of Scotland. As such a transfer, following a basic review and update, of the guidance contained with Planning Advice Note 2/2011 ‘Planning and Archaeology’ to a form that will support and can be cited within NPF4 would not only ensure clarity for all users of the planning system, but would also ensure there is no significant gap in the guidance that is being made available.
- Policy 28 and PAN 2/2011 can be further reinforced by including reference to the primary protection method for the historic environment for planning authorities, Local Authorities’ Historic Environment Records (HERs). The HERs are well placed to “aid for greater understanding and appreciation of a place’s historic environment”. We would note that reference to HERs should be included to highlight their role within planning (as they currently are within the existing SPP, Section 137 Key Documents, Section 140 “The siting and design of development should take account of all aspects of the historic environment. In support of this, planning authorities should have access to a Sites and Monuments Record (SMR) and/or a Historic Environment Record (HER) that contains necessary information about known historic environment features and finds in their area.”).
- We would also draw attention to the report [Archaeology in Development Management](#), produced by ALGAO.

Within Policy 28

- Part A) describes identifying, protecting and enhancing locally, regionally, nationally and internationally important assets. A sound principle but does not align to current Listing wording (which is no longer local/regional etc) – is this intentional?
- Part C) mentions ‘all reasonable efforts’ – are these well enough defined and understood within a planning (and potentially contentious) context.
- Part D) it was suggested that nuance of language could support the potential for reuse, with the appropriate caveats. Colloquially summarised as a “yes, but” approach rather than the current, “no, and...”.
- Part G) sets a principle that not only supports retaining local character and a sense of place, but also contributes to the sustainable development of a location. As such it would be beneficial not to limit such requirements to just conservation areas, but instead have them apply to all developments. Should tree preservation orders be mentioned within Part G?
- Part K) appears to currently neglect the vast majority of the offshore historic environment and reference to due consideration of the impacts on historic marine and maritime assets and landscapes should be added.

- Part M) appears to be well intentioned, but specific reference to the Buildings At Risk Register (BARR) to “inform and guide decision making and investment within the historic environment and other placemaking activities” is constraining; the BARR is limited in scope in terms of what it includes, and therefore risks creating a policy barrier to investment within poorer communities which may lack a conservation area or Listed Building on the BARR. To reference the BARR but not the HERs creates a significant gap and missed opportunity in terms of implementing policy.
- Part O) should include reference to “public benefit” to the list of steps to be undertaken if a site cannot be retained. This covers all manner of aspects from opportunities for outreach to interpretation, and helps to deliver the added social value requirements of development.
- Given the sheer volume of undesignated historic buildings and structures across Scotland which fall outwith of conservation areas, e.g. all the rural vernacular buildings in the countryside, it would be beneficial to align this part of the policy with the overall thrust of NPF4 for the retention and reuse of existing buildings wherever possible by including a paragraph to this effect (as currently required under Policies 6 and 30 for instance).
- Overall, this part of the policy dealing with the non-designated historic environment appears to be a significant weakening of the current policy positions taken by planning authorities within their Local Development Plans and raises significant concerns. It is the developer’s responsibility to provide information on the nature and location of archaeological features (both known sites and areas of potential sites), including details of any mitigation measures proposed, prior to the determination of the planning application. The list of mitigation currently included in the policy, while echoing elements of the existing SPP, fails to address desk-based assessment, heritage statements, surveys, environmental sampling, conservation, historic building recording, evaluations, watching-briefs (unless these last three are all considered to be covered by the term ‘recording’, in which case a definition of this needs to be included in the glossary).
- Part P) is unclear - we assume the intention is for this section to deal with unexpected archaeological discoveries during the course of development works which have no agreed archaeological mitigation strategy already in place. Practitioners have expressed that this needs to be explicitly clarified, and have suggested that, “they should be reported” is changed to, “they must be reported” – this is due to the legal requirements of Bona Vacantia and the Right of Sepulchre. Again, as previously mentioned, reference to PAN 2/2011 or an adopted version of it for NPF4 would resolve many of these issues.
- Would welcome the addition of a further text addition which mirrors that already stated within the existing SPP (Section 151), namely “There is also a range of non-designated historic assets and areas of historical interest, including historic landscapes, other gardens and designed landscapes, woodlands and routes such as drove roads which do not have statutory protection. These resources are however, an important part of Scotland’s heritage and planning authorities should protect and preserve significant resources as far as possible, in situ wherever feasible.”
- How to assess benefits? How are the assessments going to be checked e.g. life cycle assessment of the materials being used. Definitions of carbon life cycles – clarity on this. No assessment of embodied carbon value of the building and the assets - this is mentioned but not explained as to how it is measured and what it is.
- Reference to HES’ Managing Change guidance is seen as a positive inclusion, but it is noted that where the information is contained within the draft it is presented as truncated and/or abridged. This could lead to confusion as to which version to use within decision making.
- Welcome the direct policy statement about enabling development.

29. Urban Edges

- 29 Part C) welcome the inclusion of the requirement to safeguard historic environment assets when considering green belt development.

30. Vacant and Derelict Land

- Welcome the aims of this policy for the reuse of vacant and derelict land, much of which in urban areas can consist of historic buildings that would otherwise be demolished with the resulting loss of character from a community.
- 30 Part E) would benefit from the introduction of a standard requirement for providing a justification for a building to be demolished rather than reused and could be an overarching principle. The arguments here, particularly within E) are also good arguments for heritage.

31. Rural places

- While we welcome the call for sustainable development of rural communities, bold statements such as that within 30 Part B) “Development proposals that support the resettlement of previously inhabited areas should be supported” should be carefully caveated by including due consideration to the historic environment. The wording of this policy needs to be made more specific to clarify what types of previous inhabitation is included, and ‘previously inhabited’ at what point in history
- Part D) would be enhanced with inclusion of the historic environment alongside the reference to the natural environment, given the benefits that historic assets can play in local economies.

32. Natural Places

- Enhanced position of the historic environment could be seen here.

33. Soils

- Enhanced position of the historic environment could be seen here.

34. Trees, Woodland and Forestry

- Due consideration of the impacts on the historic environment should be included in this policy.

35. Coasts

- Lacks tie-in with land polices.
- Nature based solutions – impact (potentially positive, but also potential for negative) and how to move that forward in terms of planning policy and protection.

Part 4 – Delivering Our Spatial Strategy

Please provide your views on each of the key delivery mechanisms

Spatial Planning and Growth Deals:

Section 4 of the draft *Scotland 2045* recognises the importance of aligning resources but references Regional Growth Deals without giving any clear indication of their relationship with strategic spatial planning. Growth deals and spatial planning reflect different ideological perspectives, and there is potential for them to pull in different directions, particularly given the political tensions between the Scottish and UK Governments. If resources are to be well aligned the relationship between growth deals and development plans needs to be

agreed, explicit and clearly understood. The final version of *Scotland 2045* should state clearly that growth deals should reflect spatial strategies and emphasise the need for a reciprocal and iterative relationship between strategic development plans and growth deals over time.

General delivery: In February 2021 it was noted in the Position Statement that the draft NPF4 would include a Delivery Programme. However, in the draft document it is stated that a Detailed Delivery Programme and an Engagement Programme will be produced once the framework is adopted. BEFS is concerned that the ambitious and aspirational strategies and aims outlined in the draft document will be adopted without clarity on how they will be delivered. We would therefore emphasise that whilst this document relates to policies, these policies are not sufficient in and of themselves, and can only have a meaningful impact when they are adequately resourced, with leadership and action attached to them. We would further note that funding in current budget does not support the key role of planning and implementation. Useful comments on this can be read in the [RTPI's recent response](#) reflecting on the budget.

A clear and articulated understanding of where the NPF4 sits within the wider policy landscape, with signposting to other relevant policies and guidance which sit alongside the framework, is felt to be essential. It is appreciated that the Delivery Plan can only contain a certain level of detail – a solution could be to measure outcomes by referencing other documents and policies with their own quantifiable targets and outcomes.

Other comments relating specifically to delivery included:

- Sharing expertise across Local and Planning Authorities, including appropriate training will be beneficial in aiding delivery.
- Design review panels were positively mentioned and felt could play a part in future development/delivery.

Further, we would add that the stated desire for connected collaboration will not work without this transparent and effective interconnectivity with other current guidance and policy (such as Scottish Government's own [Planning Digital Strategy](#)); if this integration and articulation of policy hierarchy can be achieved, we would consider this to be a true strength of the NPF4.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at: <https://www.befs.org.uk/resources/consultations/>

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **YES**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**