

## Draft National Planning Framework 4 Consultation

31<sup>st</sup> March 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.

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)

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:

BEFS would like to note 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 has been extremely tight; in particular, 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.

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.

There is however 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 referenced in SPP. Similarly, there is no reference to Historic Environment Records (HERs) which currently sit within SPP, or Planning Advice Note 2/2011 – these are felt to be significant omissions, as they offer a better

understanding of, and protections for, non-designated assets, and therefore a broader recognition of the breadth of the historic environment. Another 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. Here BEFS would agree with HES in the view that *‘Good management of the historic environment and its component parts (including designated and undesignated heritage assets) is central to the delivery of economic, social, environmental and wellbeing outcomes, especially through place-based planning and action’*.

BEFS notes concern that further omissions may only become clear when the document is used in practice.

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.

As noted by the National Trust for Scotland - *‘page 8 of the Scottish Planning Policy 2014 sets out how the NPF and SPP mesh with other policies and strategies and help deliver these national objectives. The current draft of NPF4 would be improved by a similar, updated chart showing how the NPF functions within the hierarchy of government policy and strategy’*

This lack of connection to existing policies, strategies and guidance 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. BEFS would highlight that this *is* included within the draft Local Development Plan Guidelines (Paragraph 300 and 441 of LDP), and suggests that this could be replicated across both pieces to ensure read across.

More generally, it is considered that there is an opportunity for a greater level of cross referencing between the LDP and NPF4 documents, in particular with regards to planning decisions that impact the historic environment.

Structurally, the status of the different sections is unclear, for example the section ‘How to use this document’ points stakeholders (including practitioners and decision makers in the planning system) to Part 1 in order to *‘guide the preparation of regional spatial strategies, local development plans and local place plans’*. Greater clarity on the status of the different sections and the use of appendices could enhance the structure, add weight to the policies, and make the document more accessible to a wide range of users. Viewed holistically, the draft is also felt to lack consistency and read-across from Parts 1 and 2 (from cross cutting themes to principles) into the policies in Part 3, which seem to stand somewhat in isolation.

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.

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.

BEFS would draw attention to the use of diagrams in the draft Local Development Planning Guidelines – these provide a useful breakdown of sources and information; an approach could also be useful in NPF4.

## Part 1 – A National Spatial Strategy for Scotland 2045

Place-Making and Housing Delivery: The text on quality homes in Part 3 of the draft National Spatial Strategy for Scotland 2045 suggests 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 of 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. As 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.

**Q1. Sustainable places. Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment. 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?**

The emphasis on addressing climate change throughout the draft document is noted and most welcome. We would welcome an approach to all aspects of place, as outlined in the draft NPF4, to recognise the contribution towards net zero made by the historic environment.

BEFS would note that the current approach to sustainability and sustainable places is somewhat at odds with understanding and articulating the value and benefits of our existing environment; in not being specifically mentioned within this section, the historic and existing built environment is perhaps portrayed as being at odds with, rather than a key part of, sustainable development.

For example, the draft NPF4 describes Sustainable places:

*‘Our strategy is to transform the way we use our land and buildings so that every decision we make contributes to making Scotland a more sustainable place. In particular, we want to encourage low- and zero-carbon design and energy efficiency, reduce the need to travel unsustainably, and diversify and expand renewable energy generation. We will secure positive effects for biodiversity, creating and strengthening nature networks and investing in nature-based solutions to support nature recovery and create multiple benefits for our natural capital, health, wellbeing, resilience and jobs. And we will encourage sustainable design and use of resources, including circular economy approaches to construction and development.’*

We would consider that there is a missed opportunity here, to recognise, talk about and utilise the existing built environment and infrastructure as a sustainable resource.

**Q2. Liveable places. Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?**

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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.

**Q3. 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. Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?**

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BEFS welcomes the approach, however in this section Planning is tasked with some heavy lifting as it helps to deliver the [National Strategy for Economic Transformation](#) (only published, after this draft, on 1<sup>st</sup> March 2022). There is some question around integration of the policies – and how NPF4 can deliver on the National Strategy given the lack of previously known content and delay.

BEFS would highlight the point raised The Society of the Antiquities of Scotland: *'We look forward to seeing how Scotland's heritage can contribute to the National Strategy for Economic Transformation... Our historic environment already contributes in excess of £2.3 billion to Scotland's economy, with £2.9 billion in gross value added in 2017. The economic value of volunteers in the sector has recently been measured at £14.7 million.'*

**Q4. Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?**

BEFS considers that consistency of language and terminology enables a more joined up and coherent understanding of the shared issues towards practical implementation; as such we would suggest that the language in the different sections of the draft could be reviewed for consistency; specifically, the language in the policy section does not map the language in the principles throughout. An example of this is found within Distinctive Places *'We will restore the richness of Scotland's natural environment, protect and enhance our historic environment, and safeguard our shared heritage for future generations.'* Compared this to Policy 28, the language changes to *'preserve or enhance'* the character and appearance of conservation areas and their settings. BEFS further suggests that reference to the natural environment in isolation is unhelpful; as Historic Environment Scotland have also done, BEFS would call for more holistic natural and built environment approach, and that the 'natural and historic environment' should be read together.

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; an example from OPiT being *'Scotland's historic environment is understood and valued, cared for and protected, enjoyed and enhanced'*.

**Q5. Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?**

The clear statements on protecting and enhancing the historic environment and safeguarding our shared heritage for future generations are very welcome and have been well received. It is however, 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 - within sustainable development, homes, jobs and infrastructure. In addressing this it BEFS would suggest 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.

Another consideration is the perceived protectionist stance regarding heritage within this section and the focus on 'preservation' – 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 are not articulated. Whilst it is essential that the historic environment is protected, enhanced and safeguarded for future generations, appropriate adaptation and managing change are a part of this. An example is in HEPS principles for Managing Change: '*The historic environment enhances our quality of life and is a hugely valuable social, cultural, economic and environmental resource. It is finite and much of it can't be replaced. Good management maintains the quality of this resource and secures its benefits, making sure that nothing is lost without considering its value and exploring options for avoiding its loss*'.

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

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

The RTPI note that '*spatial principle a) on compact growth does not significantly feature in part 3 and is not mentioned at all under policy 30 on Vacant and derelict land and empty buildings*.' It could also place pressure on existing policies and existing places to understand what quality and enhanced growth looks like in practise.

Similarly, BEFS considers Part D) 'Conserving & Recycling Assets' to be of particular note, as it does not pull through to later policy where it could and should, and does not read across to sustainable places, for example with reference to circular economy: '*Scotland has many strengths and each place should be planned in a way that works with its distinctive character and identity. We will protect and enhance the assets of each of our places, leaving a positive legacy for future generations. Our focus is on making productive use of existing buildings, places, infrastructure and services, locking in embedded carbon and minimising waste, and supporting Scotland's transition to a circular economy. This includes nationally significant sites for investment which are well served by existing infrastructure and sustainable travel modes, and excellent propositions for redevelopment across urban and rural Scotland and the islands*'.

It is also felt that parts of this section could 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.

**Q7. Spatial Strategy Action Areas. Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?**

Whilst each zone may have beneficial elements within the Action Areas, the necessary interconnectivity to truly deliver on some of the aspirations is not considered and is felt to be an omission.

BEFS supports comments from the Society of Antiquities of Scotland: *'The Society is pleased to see recognition of the excellent heritage assets across Scotland's urban areas which will prove critical to sustaining city centres, developing urban fringes and coastal regeneration for example. A lot of the actions here will need careful balance between new build and existing assets, recognising the latter as essential to reaching a net zero target; there is a potential inherent conflict between 16 and 17 for example. Re-use, refurbishment and retrofitting of existing buildings should headline the solution to urban transformation.'*

BEFS also notes and supports HOPS comment: *'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 Development Management decision making is unclear. HOPS feel that it might be clearer if the Regional Spatial Strategies were used as the spatial expression of policy approaches.'*

**Q8. North and west coastal innovation. Do you agree with this summary of challenges and opportunities for this action area?**

Broadly however as above, interconnectivity is seen to be an issue. As an example, rail connectivity to the Northeast is not addressed, nor is the road network to access gateways to the Islands. Whilst these points are not new within a policy context, NPF4 has an opportunity to foreground Action Areas within this wider context. We would also query the length of this section and suggest that some of it could usefully be contained within appendices.

**Q9. North and west coastal innovation. What are your views on these strategic actions for this action area?**

This section mentions *refurbishing* but not *retrofitting*. BEFS would ask whether this is an issue of language, or a purposeful omission?

**Q10. Northern revitalisation. Do you agree with this summary of challenges and opportunities for this action area?**

No comment made.

**Q11. Northern revitalisation. What are your views on these strategic actions for this action area?**

With reference to improving infrastructure for tourism mentioned here, BEFS considers that this should be expanded to include infrastructure for communities, as we would argue that 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. Similarly, mention of a low carbon future for tourism should work for *both* communities and visitors.

The strategic actions mention reuse of redundant buildings to support green recovery and maintain character of buildings and places but does not provide the policy to support these suggestions.

We would also seek further clarity on what a *'flexible approach to planning'* referenced on p21, which *'will help to attract investment'* means in practice.

**Q12. North east transition. Do you agree with this summary of challenges and opportunities for this action area?**

No comment made.

**Q13. North east transition. What are your views on these strategic actions for this action area?**

No comment made.

**Q14. Central urban transformation. Do you agree with this summary of challenges and opportunities for this action area?**

No comment made.

**Q15. Central urban transformation. What are your views on these strategic actions for this action area?**

Reference on P.35, 17 to the reuse of land and buildings could be strengthened, and BEFS considers that the aim to *'steer development away'* from greenfield is not a strong enough response to the climate emergency. Actions may need more incentive, investment and direct policy supporting positive outcomes.

BEFS would note that whilst this action area sees a continued demand for more homes, it does not, however, headline re-use and adaptation of existing building stock as part of the solution. BEFS would suggest this is an omission and a missed opportunity to advocate for the use of the existing built environment and infrastructure as a valuable asset, as recommended by the Infrastructure Commission's [Infrastructure Investment Plan](#) on existing housing towards *'enhancing and maintaining existing assets ahead of new build'*. Specifically, P.35, 18. talks of building and new homes and the Infrastructure Plan, but doesn't mention current homes as infrastructure or fabric first interventions and maintenance – all an essential part of meeting net zero goals.

**Q16. Southern sustainability. Do you agree with this summary of challenges and opportunities for this action area?**

No comment made.

**Q17. Southern sustainability. What are your views on these strategic actions for this action area?**

No comment made.

**Q18. National Spatial Strategy. What are your overall views on this proposed national spatial strategy?**

This is felt to be a positive section of the document but – as mentioned in relation to other sections of the draft - doesn't necessarily read across to policy as strongly as it could.

Members were unsure as to how the strategy can help to promote the right use of the right places, rather than being developer led, and BEFS notes HOPS comments here: *'HOPS considers 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.'*

On P.43, decarbonising homes is included at this point without referencing any related strategies; additional information as to *how* this decarbonising of homes could be achieved could be through the inclusion of reference to:

- [Heat in Buildings Strategy, Achieving Net Zero Emissions in Scotland's Buildings](#)
- [Energy Efficient Scotland: Improving Energy Efficiency in Owner Occupied Homes](#)
- [Skills Investment Plan for the Historic Environment](#)
- [Housing to 2040](#)

## 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?**

Generally speaking, 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 be fully realised? Additionally, closer scrutiny as to how these priorities interact with other Scottish Government strategies and targets would be welcome, to identify potential conflict or misalignment between outcomes, and provide clarity on how these conflicts will be managed.

The RTPi Scotland has raised concerns that, for example, *'none of the national developments have been contained in the 21-22 Programme for Government, and the Infrastructure Investment Plan Scotland 2021-22 to 2025-26 only provides clear investment plans for Circular Economy Material Management Facilities, Digital Fibre Networks and the Dundee Waterfront'*.

**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?**

No comment.

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

BEFS would note the Society of Antiquities of Scotland's view here that *'the long-term assessment and solutions to the issue of maintenance and conservation of our historic environment assets, especially (but not limited to) sites currently considered of national importance, could be usefully considered for National Development status'*

## Part 3 – National Planning Policy

General Overview:

Whilst the policies are well intentioned and we welcome the overall direction, we would note concern that individual policies are written in a way that could lead them to be 'traded' due to contradictions inherent in them. BEFS would also question why some are expressed as Universal Policies - and some therefore by

implication, are not; if there is an intended weighting, clarity of hierarchy across strategies and policies should be clearly elaborated on.

An example of this potential conflict can be demonstrated by looking at Policies 16 and 28:

Policy 16 Business & Employment F): *‘Development proposals for business, general industrial and storage and distribution uses outwith areas identified for those uses in the local development plan should be supported where the nature and scale of the activity will be compatible with the surrounding area and there will be no unacceptable impacts on neighboring uses and the natural environment’.*

BEFS questions whether this policy might not be played off against the policies within 28, for example, due to mention of ‘natural environment’ and not a more holistic understanding of environment, as advocated for by BEFS Members.

Also of note is HOPS view that a summary document would be helpful for many stakeholders and the individual policies need to be better defined and tighter and more robust wording is needed.

BEFS supports the RTPI’s comment that *‘throughout part 3, RTPI Scotland are concerned over the regular use of the expression ‘should’ relating to the application of policies. In many cases this could cause ambiguity over whether policies must be complied with, potential weakening some of the laudable aspirations of the Framework and making clear decision-making more difficult. The policies most provide the utmost clarity for those submitting planning applications, and, for those who will be using the framework to inform decisions they need to make on development proposals’.*

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

Yes, but the important contribution that the historic and existing built environment make towards climate solutions must not be forgotten and is felt to be underrepresented.

**Q23. Policy 1: Plan-led approach to sustainable development. Do you agree with this policy approach?**

- Yes, however whilst the [Place Principle](#) is mentioned in the preamble to this policy it feels appropriate for direct reference to be included at this point.

**Q24. Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?**

BEFS agrees to an extent but would make the following observations:

- Lifecycle is mentioned but not embodied energy/carbon – this is felt to be an omission
- Consider that ‘reuse’ should be explicitly stated within this policy, particularly before considering new development and new build
- Members have voiced concern as to how this will be assessed
- RTPI are concerned over need to upskill planners in climate literacy as part of delivering against this policy

**Q25. Policy 3: Nature crisis. Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?**

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

**Q26. Policy 4: Human rights and equality. 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?**

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

**Q27. Policy 5: Community wealth building Do you agree that planning policy should support community wealth building, and does this policy deliver this?**

- Do communities need to be resourced to be able to do this? This echoes ongoing conversations, in relation to Local Place Plans.

**Q28. Policy 6: Design, quality and place. Do you agree that this policy will enable the planning system to promote design, quality and place?**

- BEFS recommends checking with the appropriate agencies and professions that policies and guidance mentioned here are up to date (e.g. HES 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 Standards 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 to *‘Reusing and repurposing existing buildings and assets supports our net zero ambitions and the circular economy.’*

BEFS supports suggestions by the Society for the Protection of Ancient Buildings that *‘a clear definition of the term quality may better be provided’* and that *‘there is an opportunity here to make a clear reference to the six qualities of place in the Local Development Plans Regulations and Guidance’*.

Also of note is HOPS view 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. The RTPI agree on the need to regularly update documents.

**Q29. Policy 7: Local living. Do you agree that this policy sufficiently addresses the need to support local living?**

- BEFS considers that the role of Local Development Plans to support 20 Minute Neighbourhoods can only be made manifest if plans are appropriately resourced.

**Q30. Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?**

- Current housing and existing buildings are not recognised as part of infrastructure here, as is in the Infrastructure Commission for Scotland, Key findings Report recommendations. BEFS would welcome clearer alignment to Infrastructure Investment Plan recommendations on existing housing, specifically ‘enhancing and maintaining existing assets ahead of new build’. [From the Infrastructure Commission for Scotland, Key findings Report](#): in Key Recommendations for Place ‘Assessments of existing and currently planned investment that could impact on this strategic housing demand profile through effective utilisation of existing assets’.

**Q31. Policy 9: Quality homes. 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?**

BEFS notes the following points:

- Statement of community benefit does not appear to include involvement from the community
- ‘High quality’ - how will this be enforced and monitored? There is no clear definition of ‘quality’. Further the term ‘quality’ is repeatedly used within both the draft NPF4 and LDP with no clarity of how enhance, support, or evidence ‘quality’ in reality
- As an unintended consequence of this policy - are smaller rural existing places at risk of expansion as developers take advantage of existing amenities to justify further growth?
- BEFS supports HOPS consideration that generally, in the draft, 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.

**Q32. Policy 10: Sustainable transport. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?**

No comment made.

**Q33. Policy 11: heat and cooling. Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?**

Whilst there is a focus within Policy 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.

Again, it is considered that aligning with Building Standards will enable intended outcomes to be more effectively achieved. HOPS view that *'This policy also needs clear linkages to Building Standards and the mandatory requirements on heat and insulation efficiency, passive and natural solutions and design concepts'* is supported.

**Q34. Policy 12: Blue and green infrastructure, play and sport. 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?**

- 12 Part D) – reference to development proposals being required to give consideration to compatibility with regional and country parks *'uses, natural habitats and character'* should be expanded to include their the cultural heritage. 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.

**Q35. Policy 13: Sustainable flood risk and water management. 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 comment made.

**Q36. Policies 14 and 15 – Health, wellbeing and safety. Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?**

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

**Q37. Policy 16 – land and premises for business and employment. 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?**

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

**Q38. Policy 17: Sustainable tourism. 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?**

BEFS makes the following comments:

- It is of note that Tourism is separated from what drives tourism activity, which can provide some policy disconnects
- *'Tourism facility'* is not defined and potentially open to misinterpretation
- Should new tourism facilities also benefit local community with amenity?
- 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.

- Part C): Development proposals in areas where existing tourism provision is having adverse impacts on the environment, or the quality of life and health and wellbeing of local communities should only be supported if satisfactory measures are proposed to alleviate existing pressures and prevent further adverse impacts.

**Q39. Policy 18: Culture and creativity. Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?**

BEFS makes the following comments:

- Heritage is not seen as within this productive sphere; this is felt to be an omission
- 'Meanwhile use' is absent and could sensibly sit within these policies
- 18 Part D), subclause – who defines 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 heritage (as well as other areas), 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 consider other means of celebrating the history and heritage of an area

**Q40. Policy 19: Green energy 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?**

- 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.
- BEFS welcomes the inclusion within Part K) for developments to take into account '*impacts on historic environment assets, including scheduled monuments, listed buildings and their settings*'.
- HES note that this section appears market-led not plan led approach as championed in Policy and highlights the potential conflict here between heritage and development.

**Q41. Policy 20: Zero waste. 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?**

- BEFS notes the omission of existing buildings as part of circular economy considerations
- Welcome the requirement to reuse and recycle materials as stated in 20 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
- 20 Part B) materials *and buildings* could be included within this context
- BEFS welcomes 20 Part E) and the inclusion of consideration of the impacts on historic environment assets

**Q42. Policy 21: Aquaculture. Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?**

No comment made.

**Q43. Policy 22: Minerals. 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?**

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

**Q44. Policy 23: Digital infrastructure. Do you agree that this policy ensures all of our places will be digitally connected?**

- Futureproofing is asked for here, but not within green energy for example. Same could be asked of different types of development across the document? There is also some concern that by asking for futureproofing, digital infrastructure could be delayed.

**Q45. Policies 24 to 27 – Distinctive places. Do you agree that these policies will ensure Scotland’s places will support low carbon urban living?**

- Broadly positive approach which should continue to consider the natural **and** historic environment as inherently beneficial aspects of existing places
- We would encourage and support these policies, with appropriate treatment for traditionally constructed buildings
- BEFS notes RTPI Scotland’s supports for Policy 25 ‘*which sets out that out-of-town development including new retail is not supported. RTPI Scotland also supports the policies support for development which diversifies and strengthens city, town and local centres whilst seeking to avoid the clustering of certain developments that can have negative impacts on communities. However we strongly believe that the policy should be strengthened to contain a clear presumption against drive-through retail, aligning with the principles of policy 11. To support the implementation of this policy, RTPI Scotland wish to see current town centre and retailing methodologies, published in 2007, updated to reflect a changed policy context. This could be achieved for example through removing the current catchment area definition set out by car travel to support the new neighbourhood shopping and living locally policy.*’
- BEFS notes Member concern that there is the potential for the unintended consequence; that economic impact could inadvertently be given primacy
- Town centre living: there is a problem within many city/town centre locations regarding conversion to residential use and lack of suitable amenity space. This should be addressed within the Policy and some thought given to how to allow/ encourage town centre living in densely developed areas where there is no amenity space available.

**Q46. Policy 28: Historic assets and places Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings?**

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.

However, there is some concern specific to this policy (but also in reference to a number of others) that the language to describe thresholds of acceptability around what affects and impacts the historic environment could be seen as quite adversarial, and perhaps difficult to uphold whilst managing change. For example, the

phrase ‘*no adverse affects*’ on the Historic Environment was seen as unrepresentative of the reality, in that negative impacts must be *offset*. As such it is recommend that the language is revised, e.g., ‘unacceptable negative impacts’ rather than ‘no adverse affects’.

An example of this can be seen here: 19.E): ‘*Development proposals to repower, extend and expand existing wind farms and for the extension of life to existing windfarms should be supported unless the impacts identified (including cumulative effects) are unacceptable*’.

### Compared to

J) ‘*Development proposals for solar arrays should be supported where the planning authority is satisfied that the arrays would **not adversely affect** (including the effect of glint and glare) residential amenity, road safety, **historic environment assets**, or aviation interests. Ground mounted arrays should be installed using pile driven or screw foundations rather than trench foundations to facilitate restoration of the site.*’

There is some apprehension felt as to how the NPF4 will be used alongside Local Development Plans, and a clearer picture of the interrelationship of existing plans and strategies, as well as the wider policy landscape would be welcome.

BEFS would also seek clarity around how these policies aid decision makers in balancing competing priorities, informed by NPF4, considering economic necessities against other priorities. This is in part due to the wider issue of how sustainability is understood and how the use of our existing built environment is seen to fit – or not fit - within this.

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 (which is no longer local/regional etc) – is this intentional? E.g.:

#### **Category A**

*Buildings of special architectural or historic interest which are outstanding examples of a particular period, style or building type.*

#### **Category B**

*Buildings of special architectural or historic interest which are major examples of a particular period, style or building type.*

#### **Category C**

*Buildings of special architectural or historic interest which are representative examples of a period, style or building type.*

- From SoAoS: ‘*Part B) states only projects “with a potentially significant impact” on historic environment assets or places would require further and more detailed assessment. Who makes the decision as to what might be significant in this context without the initial assessment to determine potential impact? This should read “with potential to impact”.*’
- 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. RIAS comments: *‘The protection of setting is important, and the text should provide a clearer explanation of the setting of historic sites and areas. There are many occasions where development is proposed or occurs outside the boundary of conservation areas and other heritage sites which will have a negative impact on the setting of the heritage site, either through inappropriate height, density or design.’*
- Should tree preservation orders be mentioned within Part G?
- From SoAoS: *‘Part J) should mirror the policy in Part I) ensuring development “should only be supported where they protect, preserve and enhance such places and do not impact adversely upon the cultural significance, character and integrity of the site; nor upon important views to, from and within them; nor upon the setting of component features which contribute to the battlefield landscape and their historical, cultural and archaeological interest”.’*
- Part K) appears to currently neglect the 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
- It must be clearer that development located outwith these protected areas, may have an impact on them and that this will be a material consideration and development that is considered to have a negative impact will not be supported
- 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
- BEFS also notes ALGAO’s comments that *‘This section represents a considerable weakening of the policy dealing with undesignated archaeological remains. Management, protection and enhancement of undesignated remains account for in-excess of 95% of the management of the historic environment undertaken through the planning process as highlighted by Scotland’s Historic Environment Audit (SHEA).’*
- ALGAO also raise concerns that *‘The wording of this section is also limiting in the potential mitigation measures that may be required. We would advise that the term ‘appropriate mitigation’ replaces the word ‘excavation’ as excavation has a very specific technical meaning and will be limiting in this context.’*
- 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).

Example: *'Policy 30) Vacant and Derelict Land a) Local development plans should seek to reuse vacant and derelict land and redundant buildings as a priority including in proposals to creatively and sustainably repurpose buildings and structures.'*

- 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. Reference to PAN 2/2011 or an adopted version of it for NPF4 would resolve many of these issues.
- BEFS 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.'*
- This policy raises the question of 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 would be welcome. As it stands there is 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.
- BEFS welcomes the direct policy statement about enabling development.

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.

BEFS support the concerns highlighted by ALGAO regarding the omission of *'reference to appropriately curated Historic Environment Records (HERs). HERs are the primary tool used by local authorities to help assess impact upon the historic environment and are the most comprehensive sources of information for the historic environment within the planning regime. These should be referenced as key for focusing and*

*developing sustainable places to live’ and ‘The omission of any reference to the crucial technical information currently contained in PAN 2/2011. The information currently contained within the PAN is essential to the delivery and application of policy.’*

This is further emphasised in comments made by the Society of Antiquities of Scotland, in that *‘this policy is where we would expect to see the contents of Scottish Planning Policy: Valuing the Historic Environment reflected, and several key documents referenced there are missing here, for example Planning Advice Note 2/2011: Planning and Archaeology, which helps clarify processes for working with historic environment assets in the planning process. If this advice is not to be referenced there must be clarity that this will be urgently included in the Managing Change Guidance Notes published by Historic Environment Scotland which are referenced.’*

BEFS considers that reference to HERs should be included to highlight their role within planning (as they currently are within the existing SPP). 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 HER that contains necessary information about known historic environment features and finds in their area. HES’ Managing Change Guidance Notes series are, as mentioned, a welcome inclusion for the additional guidance they can provide to local authorities and developers, however 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.

RIAS agrees *‘HES guidance including the Managing Change suite of documents should continue to be material matters in the consideration of planning applications. Other key documents, including Planning Advice Note 2/2011: Planning and Archaeology and Planning Advice Note 71: Conservation Area Management, currently referenced in SPP should be referenced in NPF4.’*

BEFS would also draw attention to the report [Archaeology in Development Management](#), produced by ALGAO.

**Q47. Policy 29: Urban edges and the green belt. 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?**

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

**Q48. Policy 30: Vacant and derelict land. Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?**

BEFS welcomes the aims of this policy for the reuse of vacant and derelict land and buildings, 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.

BEFS would support the view however that vacant town/city centre locations are less likely to be used for retail and office use now and in the future. Therefore, residential use of vacant, urban sites and buildings

should be encouraged – especially vacant upper floors. This is currently very difficult to achieve in densely developed town/ city centre locations due to lack of suitable amenity space. Scottish Government should research how to overcome this and allow residential use to be compatible with such city/ town centre locations.

- 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
- Regarding the principle: *‘We want to proactively enable the reuse of vacant and derelict land and buildings. The reuse of vacant and derelict land and properties can contribute to climate change targets and support biodiversity, health and wellbeing improvements and resilient communities by providing much needed greenspace, growing spaces and other community benefits. Redevelopment for housing or businesses can also turn an under-utilised and latent asset into productive use and limit the need for urban expansion. The planning system should prioritise the use of vacant and derelict land and properties including supporting appropriate temporary uses where proposals for permanent development are unlikely to be imminent.’* BEFS would argue for heritage as key ‘asset’ within this principle

**Q49. Policy 31: Rural places. Do you agree that this policy will ensure that rural places can be vibrant and sustainable?**

- While BEFS welcomes 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 of the historic environment. The wording of this policy could be 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

**Q50. Policy 32: Natural places. Do you agree that this policy will protect and restore natural places?**

- Enhanced position of the historic environment could be seen in this policy
- BEFS supports the Society of Antiquities of Scotland’s view that the precautionary principle should also apply to our historic environment

**Q51. Policy 33: Peat and carbon rich soils. Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?**

- Enhanced position of the historic environment could be seen in this policy

**Q52. Policy 34 – Trees, woodland and forestry: Do you agree that this policy will expand woodland cover and protect existing woodland?**

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

**Q53. Policy 35: Coasts. Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?**

- Nature based solutions – BEFS would consider the impact (potentially positive, but also potential for negative) and how to move that forward in terms of planning policy and protection

- BEFS also notes a lack of tie-in with land polices

## Part 4 - Delivering our spatial strategy

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

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. BEFS would suggest that 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. Further, 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.

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.

### Q55. Do you have any other comments on the delivery of the spatial strategy?

#### 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 supports HOPS view, in that critical to the success of NPF4 will be its delivery. Ensuring that planning policies are robust, clear and concise will be important. How NPF4 is to be delivered needs to be fully considered, including the financial resources, both capital and revenue.

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.

BEFS notes HOPS' further comments that *'The Draft NPF4 places additional requirements on Planning Authorities, and complexity in particular through assessing and determining planning applications and reviewing Local Development Plans. These additional requirements go beyond the 49 new and unfunded duties which were placed on Planning Authorities through the Planning (Scotland) Act 2019. It is therefore crucial to the success of Scotland's planning system and NPF4 that Planning Authorities are properly resourced.'*

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.

## Draft National Planning Framework 4 Consultation

31<sup>st</sup> March 2022

As noted by RTPI Scotland: *'The Framework's success will very much rely on the quality of the associated guidance ...RTPI have identified a range of methodologies, plans and guidance that will need updated to support planners to deliver the intended outcomes of the Framework including:*

- *Scotland's National Marine Plan (2015)*
- *Designing Streets (2010)*
- *Creating Places (2013)*
- *Development Planning and Management Transport Appraisal Guidance (2011)*
- *Town Centre and Retailing Methodologies (2007)*
- *HES Managing Change Guidance Notes'*

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RIAS adds that *'the Historic Environment Policy for Scotland (HEPS) is a policy statement directing decisions that affect the historic environment in Scotland. We would like to see HEPS incorporated into SPP within NPF4, making HEPS statutory.'*

BEFS appreciates 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 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 understands that the Scottish Futures Trust is *'leading a collaborative workstream on delivery, which will bring together stakeholders as part of our engagement programme to consider how the national developments in particular can be supported by a shared delivery programme. This will also build on previous work including the Infrastructure Investment Plan; test recommendations from the Infrastructure Commission Scotland and related Place good practice principles, that are most relevant to NPF4; and work with the Infrastructure Delivery Group which was established as part of our ongoing programme of planning reform. The outcomes from this project will inform the basis of a delivery programme to accompany the finalised NPF4 once approved and adopted.'* This is most welcome and BEFS looks forward to contributing to the process.

### Part 5 – Annexes

**Q56. Annex A. 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?**

No comment made.

**Q57. Annex B. Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?**

No comment made.

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

BEFS notes the response made by the Society of Antiquities of Scotland in that *‘there is a mixed use of terms throughout the document which require clarity with regard to the historic environment, the term “cultural heritage” (e.g. Rural Places and Six Qualities of Successful Places) should probably be either defined or replaced. “Historic assets” is also used, presumably as a short-hand for “historic environment assets” – but should probably be fully expanded to match the glossary term.’*

### Integrated Impact Assessments

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

No comment made.

**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 comment made.

**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 comment made.

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

No comment made.

**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 comment made.

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

No comment made.

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

No comment made.

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

No comment made.

## Draft National Planning Framework 4 Consultation

31<sup>st</sup> March 2022

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

No comment made.

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

No comment made.

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

No comment made.

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

No comment made.

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

#### **RESPONDENT INFORMATION**

Name: Hazel Johnson, Policy and Strategy Manager

Email: [hjohnson@befs.org.uk](mailto:hjohnson@befs.org.uk)

Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

Address and Postcode: 61 Dublin Street, Edinburgh, EH3 6NL

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**