

THE FOURTH NATIONAL PLANNING FRAMEWORK (NPF4): TWO YEARS ON

Introduction

Built Environment Forum Scotland (BEFS) is an 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 opportunities and challenges facing Scotland's existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

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

- [Scottish Government Draft National Planning Framework 4 Consultation](#)
- [Scottish Government Investing in Planning Consultation](#)
- [Scottish Government Masterplan Consent Area Regulations Consultation](#)
- [Scottish Government Call for Views on Permitted Development Rights and the Housing Crisis](#)

BEFS welcomes the Scottish Parliament's Local Government, Housing and Planning Committee's progress review into delivery of the Fourth National Planning Framework (NPF4). Two years on from publication presents a timely juncture at which to explore how the Framework is functioning in practice.

BEFS is pleased to contribute a response to the Committee's call for views on behalf of its 40+ Member bodies. This response draws from BEFS members' direct experiences and engagements with the spatial planning system since NPF4 was introduced in February 2023.

Three Key Messages

The three main areas BEFS wishes to draw the Committee's attention to are:

1) Low Capacity

BEFS Members are in strong agreement with the central outcome of the Committee's first annual review, which highlighted major capacity limitations in planning authorities. This is a long-standing structural challenge in the planning system, which greatly restricts the speed and quality of decision-making, and shrinks the time and space available for constructive exchange between planning officers and the wider built environment sector. In its most recent [2023 research briefing on Resourcing the Planning Service](#), BEFS Member RTPI Scotland highlighted a 28.6% drop in local government expenditure on planning in Scotland since 2010.

2) Unclear Hierarchy

The complexities around the multiple priorities that NPF4 is seeking to contribute to and align with, has created a challenging operating environment for everyone involved with the planning system. While addressing climate change is a welcome and important predominant aspiration, the absence of a clear hierarchy in NPF4 themes beyond that is causing practical difficulties. BEFS Members highlighted the existence of tensions and contradictions between key policy areas such as protecting historic assets, biodiversity, local living and rural revitalisation. The difficult economic realities for all sectors at present exacerbates some of these tensions, creating harder holistic choices around prioritisation benefitting people and place.

3) Too Inflexible

Some BEFS members reported concerns that an over-cautious, risk-averse and unduly rigid approach to interpretation and application of policy has emerged under NPF4. This has led to situations in which some development and refurbishment plans are refused outright, while a more flexible and considered approach may have led to finding mutually agreeable solutions that align with NPF4 principles – and could, in some cases, better enable the use and re-use of empty and vacant historic buildings and homes. Alongside the low capacity and competing hierarchies mentioned above, a lack of investment in relevant experience in some planning departments was identified as a main contributor to an outlook perceived by some as being unhelpfully inflexible.

BEFS Member Views

Elaborating on the above, BEFS Members are primarily concerned with the practical ability of under-resourced planning authorities to support the delivery of NPF4.

As [RTPI Scotland research makes clear](#), planning authorities have been obliged to deal with a triple threat in the current context: a significant decline in resources; a sharp rise in additional unfunded duties; and an increasingly complex policy landscape to navigate. This makes it highly challenging for planning officers to effectively and efficiently deal with the breadth and diversity of responsibilities linked to NPF4. As a result, BEFS Members are reporting negative impacts on project plans and delivery including delays, higher costs, burdensome requests and reporting duties, unclear advice, and inadequate time for discussion.

A linked problem is the reality that many experienced planners have left the sector in the last ten years. In general, the system is relying on smaller planning teams with, in some cases, less experienced staff. BEFS Members feel that this has led to an overly cautious approach to the interpretation of policy, and a lack of familiarity with supporting guidance. This has been compounded by a similar reduction of personnel, skillsets and experience in some related areas, such as transport, archaeology, architecture and ecology. This has exacerbated delays and limited scope for enhanced alignment across themes and across local government departments.

By way of example, the commitment to improving biodiversity was highlighted as clashing with the commitment to protect historic assets. A common challenge with substantial repair and maintenance works for historic buildings is the obligation to arrange for ecological surveys of bats during breeding season in spring. The time window and shortage in specialist skills can bring about delays of a year or more, during which time the fabric of the building may suffer severe damage and further deteriorate.

Members were keen to highlight the need to streamline processes that can mutually deliver for both biodiversity goals and the planning process. In their experience, however, the key NPF4 spatial principle, that “Scotland’s rich heritage, culture and outstanding environment are national assets which support our economy, identity, health and wellbeing”, is not being given adequate weight. A related outcome is that some BEFS Members with assets in significant disrepair have explored the risks, uncertainties and costs involved in obtaining planning permission under NPF4, and decided against taking remedial action.

The clarity and consistency of guidance linked to NPF4 is a further area BEFS Members would like to see investigated and addressed. There are many supporting documents, but a lack of cohesion and clarity on how they interact. The relationships between NPF4, Building Standards, Local Place Plans, the Place Principle and the Heat in Buildings Bill, among other relevant policy developments and primary and secondary legislation, is unclear to a broad range of players in the built environment sector. As BEFS has previously

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noted, there is an indistinct hierarchy both within NPF4, and between NPF4 and the wider legislative environment.

The ability of NPF4 to help implement and resource local living improvements, especially access to amenities in lower density places, continues to be an open question for many BEFS Members. A timing challenge has also been picked up in Local Development Plans (LDPs), the vast majority of which pre-date the adoption of NPF4. While some new LDPs are in development, BEFS understands that many planning authorities are awaiting guidance and are not expecting to adopt new iterations until 2028-30. The current 2023-2028 period, in which most administrative regions are operating under a new NPF and an old LDP, can create a further source of confusion around land and building reuse plans and priorities.

Some BEFS Members have pointed to a practical opportunity for positive change in this regard. NPF4 is a fixed document, and as such may be less well-suited to the present digital era. Translating its content into a fully interactive web resource may provide benefits in supporting use across sectors, and incorporating recent and ongoing updates to guidance documents, as well as signposting to external policy areas.

There is further work to be done in better engaging communities through access to information and guidance for NPF4, LDPs and Local Place Plans. These policies clearly recognise the role of communities in shaping their places, and a more accessible digital platform would enhance practical implementation. An easy-to-use, interactive and regularly updated 'living' resource could provide significant improvements in access and understanding for all players, from citizens and community groups to asset owners, developers and planning professionals.

Much of the above feedback will be familiar to the Committee from its first year review, and from the Scottish Government's [Investing In Planning consultation](#) last year. BEFS Members are enthusiastic about the establishment of a National Planning Improvement Hub, and related investments in the Scottish Planning system that is set to create a pipeline of new planners via bursaries, graduate programmes, and the creation of a Town Planning School in the University of the West of Scotland.

There is some optimism that these investments will help alleviate capacity pressures and improve skills and experience, although it is likely to be some years before the outcomes are realised. BEFS Members are also cognisant of ongoing actions around providing and updating additional guidance and signposting to supportive documents and external policies, which will hopefully prove helpful in resolving some hierarchy-related tensions and mixed interpretations.

The post-NPF4 appeals environment has been raised as an area in which BEFS Members would like to learn more. Research and information on how NPF4 is being tested at appeal, and what happens when errors are found, would provide useful insights to the sector and to policy-makers.

BEFS Members are supportive of NPF4 in principle. They sympathise with pressures on planning departments, and appreciate the complexities involved in seeking to support and align with so many laudable cross-cutting themes across urban and rural Scotland. As [a March 2025 blog from the BEFS Director demonstrates](#), the interconnected policy landscape around planning and the built environment is incredibly complex.

It is no surprise that some of the problems BEFS Members are experiencing are emerging in this context, and the most effective route to improving the efficiency and effectiveness of the planning process under NPF4 would be to alleviate pressures on overstretched planning departments. The establishment of a National Planning Improvement Hub and Champion, and investments in planning skills are welcome. Nonetheless, the

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Committee should be aware of the current depth of concern around NPF4 in practice from the perspectives of BEFS' Membership.

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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: Derek Rankine, Head of Policy and Strategy

Email: drankine@befs.org.uk

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

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

I confirm that I have read the privacy policy and that I have read and understood how the personal data I provide will be used.

I would like my response to be published in its entirety with name and organisation.

I would be happy to be contacted by the Committee about this response and future business.