

Questions - Part 1 – A National Spatial Strategy for Scotland 2045

1 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?

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?:

1. SPF is firmly of the view that Scotland can only meet its climate change targets if it continues to have a successful, inclusive, and sustainable property industry that can provide a built environment that meets the needs of people and businesses. Our members, and the wider property industry, are making significant contributions to increasing the sustainability of the built environment and reaching the Scottish Government's target of net-zero by 2045.
2. Our future towns and cities will need to adapt to greener modes of transport, as well as greener energy and heat sources. The maintenance and enhancement of green spaces and active travel opportunities are also high priorities for communities and local authorities. The real estate sector can work with authorities to plan for these amenities to create sustainable development. It will be important to maximise the potential of blue and green infrastructure around new developments and to maintain and improve such infrastructure.
3. Electrical power is becoming increasingly important to our ambitions to achieve net-zero carbon and we expect this trend to continue. It is, therefore, vital that every new residential and non-domestic property has access to a reliable electricity supply and, to achieve this, that the generating capacity is identified and planned for to ensure that the grid can handle the increased load that the electrification of heat will entail. Capacity of the grid extends well beyond the planning requirements of a single development and should be a priority at both regional and national levels.
4. There must be greater emphasis on the ability to feed into the grid via locally generated renewables such as solar or wind. Our members have reported a conflict between wanting to be able to create renewable energy in their developments but being unable to because the grid does not have the capacity to receive it. Greater consideration must be given of the opportunities and need for the decentralisation of electricity production.
5. It is vital that NPF4 takes account of these challenges and ensures that the electricity infrastructure is provided to enable development and allow the provision of low and zero-carbon energy.

2 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?

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?:

1. Policies for housing must be considered holistically, otherwise there is a tendency towards a range of policies that do not necessarily align with each other and indeed may conflict – increased densities; increased biodiversity; the need for sustainable generating capacity; more affordability; ultra-low carbon building; reduced car use, which means people need somewhere to leave their cars whilst they use public transport; and a spread of aspirations, which can work against one another.
2. A fundamental tenet of good placemaking is mixed-use developments that meet the needs of all age ranges and are flexible and adaptable. Good infrastructure (particularly transport) is vital for placemaking along with access to a mixture of property uses including retail outlets; employment; housing; and leisure. This is central to creating resilient communities, and if applied pragmatically, will support the aspiration to strengthen our existing towns and cities and achieve 20-minute neighbourhoods.
3. The property industry has emphasised the importance of placemaking for some time now. Our members build Scotland's workplaces, homes, shops, schools and other facilities and the infrastructure that serves them. The SPF is committed to ensuring that the positive impact that the real estate sector delivers for local communities and our cities continues. It is people who generate the need for infrastructure, and no matter how well designed and constructed a town centre is, the major factor in how it performs will be how it is used, and whether it is seen as a desirable destination where people want to spend time.
4. Our members agree that the Place Principle is key to providing a successful response in the Planning System to the country's recovery from COVID-19 and is at the heart of creating a more sustainable and fair Scotland. Our members also agree that a collaborative place-based approach to future development is important. At this important juncture it is essential that NPF4 provides a framework of the key principles of good practice in the context of spatial planning on workplaces and locations.
5. We agree that provision or maintenance of green or blue spaces should be encouraged and facilitated within appropriate developments. There should not, however, be a 'blanket' approach to requirements, as these will differ, depending on the location of developments. For example, the requirements for high density city centre flats will not be the same as for family housing in suburban areas.
6. To refurbish and reuse existing buildings effectively, some degree of relaxation is required in the use and adaptation of heritage buildings. Many of our towns and cities contain large quantities of Victorian building stock and to refurbish these to provide modern, low carbon business premises and healthy homes, flexibility on heritage restrictions is required. While NPF4 should encourage the effective re-use of buildings with this in mind, the policy should also recognise that in some instances, the loss of heritage assets may be acceptable to deliver wider economic and community benefits. This is in

accordance with the Historic Environment Scotland Policy Statement and the HES guidance on Managing Change in the Historic Environment.

7. Whilst we support the introduction of an overarching principal policy that puts the needs of people and their health and wellbeing at the heart of the planning system, we have concerns as to how potential health impacts from new development are to be assessed as part of the planning process. The proposed policy change indicates that an evidence-based approach will be embedded. Our members have questioned what types of health impact assessments will be required for new developments, over and above studies such as air quality assessments and noise impact assessments.

8. Clarity will be needed on any policy that requires submission of evidence for either certain types of new developments that may for example affect air quality, or those within defined local authority Air Quality Management Areas. The costs to the development industry involved in preparing the evidence to support planning application submissions are already high. Our members are therefore concerned about potential further additional supporting technical studies being made mandatory and the negative impact this would have on potential investment.

9. The principle of twenty-minute neighbourhoods needs to be applied flexibly. This is open to strict interpretation at Local Authority level which could frustrate new development that is not in urban setting and/or seeking to address demand for more rural housing. There must be recognition that the policy is applied flexibly depending on local context and the specifics of each development proposal.

3 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?

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?:

1. The real estate sector is a key catalyst for jobs, investment and creating places to support the economic recovery in Scotland. The Fraser of Allander Institute found that for every £100m of new demand for commercial property, the sector creates an additional £73m for the wider Scottish economy. In addition, commercial property activity helps to support around 49,000 direct full-time equivalent jobs in Scotland and a further 43,000 jobs as a result of spill-over effects.

2. Beyond its economic contribution, our sector is vital to the health of our towns and cities. Property investment is often the catalyst for urban regeneration and renewal. It also generates social capital and creates happier, healthier, and more sustainable places.

3. While we see all the priorities and outcomes in the National Performance Framework as important, we would suggest that NPF4 must pay significant attention to driving the delivery of the economic priorities. Without a successful economy, Scotland will find it increasingly difficult to deliver the wider vision for inclusivity and well-being.

4. Our members believe there will be an increasing emphasis upon destination and place-making as investors and people look for quality places to invest in, live, work and play. An efficient planning system, including an effective and reliable pre-application process, can enable development and investment in our economy. A key concern of our members is the lack of differentiation in NPF4 around towns and cities, which have different requirements and different needs. Indeed, some cities are a collection of smaller towns.

5. Our members also have concerns about the presumption towards brownfield sites over greenfield sites. A particular issue relates to land assembly and the use of compulsory purchase orders, as part of regeneration projects and more explicitly the provision of housing in cities. We are concerned that this could have a negative impact on viable businesses that would have nowhere to relocate to, and result in lots of houses in towns and city centres, but a lack of employment land and little provision for businesses. Local authorities have a duty to ensure an adequate supply of land for employment purposes in towns or city centres regardless of whether this is existing office and industrial stock or undeveloped sites on designated industrial estates. It is important that the policy restates that requirement.

4 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?

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?:

1. As previously stated, the SPF has long supported the Place Principle. The delivery of high-quality community facilities in response to a community's needs is key to placemaking. To improve local biodiversity and reduce environmental impact, work at a national level is required on public and utility infrastructure. Many domestic and urban areas could have significantly improved air quality and green space if electric and low carbon transport is planned and implemented properly. This requires a local authority or government masterplan level of implementation for the successful achievement of this aspiration.

2. The prioritisation of digital connectivity so that people can work effectively from home would allow remote working in rural areas and create more demand for businesses and services in these areas. This would encourage the use of local services and facilities within these settlements rather than on a commute to or from work. There has been a significant increase in people seeking out rural properties through COVID and that will presumably continue generally but requires efficient home working.

3. The challenges of assessing housing needs are generally more understood in the major population centres but can be more complex in remote/rural areas, where loss of population and issues with second homes can have significant impact on housing supply and demand. Our members are of the view that there needs to be a balance between supporting the sustainable growth of rural communities along with the provision of suitable local amenities to

make them self-sustaining.

5 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?

Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?:

1. SPF members are supportive of the aims of the spatial strategy but feel that there has to be improvements in planning and investment in the upfront infrastructure that is necessary to create sustainable places.

2. A key concern of our members is the lack of differentiation in NPF4 around towns and cities, which have different requirements and different needs. Indeed, some cities are a collection of towns.

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

Do you agree that these spatial principles will enable the right choices to be made about where development should be located?:

1. Our members are concerned that many of the proposals in the draft NPF4 are aspirational and laudable but have not been expressed as a spatial concept. For example, it is not clear how the proposals for community wealth building will be interpreted by investors and even individual Local Development Plans proposals, or how this would be applied in decision-making terms by different local authorities.

2. When we refer to 20-minute neighbourhoods, we then need to be clear what we mean by the concept, where it is appropriate to apply it, and once applied how it will influence development management decisions for individual development sites. Without this definition, there could be uncertainty within the real estate industry about what is required to achieve an effective 20-minute neighbourhood, and what a planning authority would expect to see included.

A presumption for brownfield sites ahead of greenfield will be counter-productive in some instances, particularly in areas where there is pressure on housing targets.

2. SPF do not believe that it is appropriate for NPF4 to include a general preference for vacant and derelict land for new development as a priority over urban expansion including greenfield land. A commitment to limit urban expansion where vacant and derelict land can be "used more efficiently" is also vague and open to very broad interpretation. The term could be weaponised so that it frustrates urban expansion in practically any development scenario (include uses that would plainly be more appropriate at this location). The policy must more overtly recognise restrictions on use of derelict and vacant and including sites that are severely restricted by contamination, lack of access, remoteness or where the economic hurdles cannot be met (such as where the redevelopment requires a perceived over-development of the site). Whatever the role of vacant and derelict land is to be, this should not be at the expense of the release of potentially more suitable greenfield sites.

3. Some of our members have suggested the introduction of a vacant building credit-type system to encourage development in the brownfield sites.

4. In the short-term our members have strong concerns that there is a gap in local plans between now and when the SPP comes into force. Given the effect of the COVID pandemic, some flexibility will be required around change of use and assistance in reaching decisions based on priorities.

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

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?:

1. There is much to be commended in the proposals for Spatial Strategy Action Areas. The success of the strategy areas will depend on strong civic leadership and positive engagement on shared objectives from the public sector and the development & investment sectors, including inward investment from overseas. The strategies must be appealing to UK and overseas investment, particularly in the creation of infrastructure including energy generation/distribution and in sustainable travel.

2. The spatial strategy action areas each comprise very large areas of the country and include both highly urbanised areas and very remote areas. By way of an example, the Central Urban Transformation covers a vast area within the central belt of Scotland which includes Edinburgh and Glasgow but also Loch Lomond and the Trossachs and parts of the island communities to the west. It is not clear how these areas benefit from a single spatial strategy where their needs are vastly different. The spatial strategy areas also cross over one another. It is not clear if that is intentional or, if it is, what the role is of the areas that sit within two different spatial strategy areas.

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

Do you agree with this summary of challenges and opportunities for this action area?:

Yes

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

What are your views on these strategic actions for this action area? :

As with other sections of NPF4 much of the delivery of this plan will depend on appropriate and timely infrastructure provision. This includes improved transport to the rest of Scotland and beyond, the establishment of wider electric vehicle charging points and connections to the national grid for

renewable energy sources. The region is well set to further develop its tourist and renewables industries, but it will need connections and good local labour resources to fully boost these local economies. This will mean new housing to grow and retain higher levels of population across the region.

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

Do you agree with this summary of challenges and opportunities for this action area?:

We agree. The summary might also include the challenge of logistics to support this northerly part of the UK because this will need investment if the development of the area is to be secured. The enhancement of Inverness Airport will have a strong role to play, but also rail and ports.

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

What are your views on these strategic actions for this action area?:

The region already benefits from a high quality of life in many respects. In recent years the area has seen significant hotel investment to support the tourist industry and after the pandemic we anticipate this trend will continue. The growth of the region cannot be limited to the tourist industry however and we believe the potential for new housing, logistics and distribution and cultural attractions must be supported with better transport infrastructure if the population is to grow and thrive.

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

Do you agree with this summary of challenges and opportunities for this action area?:

We agree with the challenges and opportunities identified. We would add that Aberdeen itself is tackling historic challenges to its city centre, including the look and feel of its central Union Street location. This is important and the improvement of the city centre will be key to the successful transformation of the wider area as a destination for tourism and the retention/attraction of high-quality jobs and employers.

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

What are your views on these strategic actions for this action area?:

The other key strength and opportunity of the area is of course its higher education institutions. However, to continue to attract students successfully the HEIs will need to be supported by good student accommodation and amenities in Aberdeen especially. This should fit with the city's wider aspirations for growing city living to support a vibrant city centre.

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

Do you agree with this summary of challenges and opportunities for this action area? :

In general, yes but the strategy is unclear and lacks ambition on the specific challenge of improving public transport across Central Scotland. For example, there is a lack of commitment to meaningful improvement to high-speed rail and rail capacity which would take cars off of the highly congested M8 corridor. It is unclear how the congestion issues between and in the major cities will be mitigated.

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

What are your views on these strategic actions for this action area? :

The draft NPF4 correctly identifies the opportunity for decarbonising the Scottish economy. A strategy for decarbonising heat for our built environment through supporting district heat networks is surprisingly light however and we feel this should be given greater priority and support.

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

Do you agree with this summary of challenges and opportunities for this action area?:

We agree with the analysis for the area. There are perhaps further opportunities to enhance the attractiveness of the area for employees based in the central belt, as people move to more hybrid working arrangements. This itself could bring its own challenges for new and affordable homes, social infrastructure and investments in transport and energy provision.

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

What are your views on these strategic actions for this action area?:

We support the principle of the series of low carbon towns identified, but they will need public finance support if they are to build a platform for investment in their areas. The government and respective public authorities may need to prioritise development in one town to prove the success of this concept. The action plan questions the approach to current economic investment which is characterised as growth corridors being connected to road infrastructure across the region. It is suggested that this will need to change. However, it is likely that cars will remain the key mode of transport in this region and therefore the roads will remain a critical infrastructure for the area, requiring improvement and maintenance. But cars will ultimately be electric vehicles rather than petrol or diesel powered. As with other parts of the country, the south will need to adapt its infrastructure to meet this demand for electrical power.

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

What are your overall views on this proposed national spatial strategy?:

1. We have addressed the specific questions raised in the draft NPF4, which focuses on general and very high-level principles. Our members are of the view that NPF4 contains some good policy narratives, although they can at times be conflicting, it is light on actual delivery detail.
2. A key concern of our members is the lack of differentiation in NPF4 around towns and cities, which have different requirements and different needs. Indeed, some cities are a collection of towns. Indeed, our cities are often a collection of smaller towns based around a core city central district. The NPF4 often talks about town centres, but the needs of core city centres are also vitally important to the economy and attractiveness for tourism and employers.
3. Positive policy is required to set out the role that Planning Authorities and Statutory Consultees must have in supporting a low carbon economy, particularly in the wake of the COVID emergency. In its current form there is a risk that NPF4 could limit development rather than enable it. There remains a risk of tension between policy principles that gain support at national level but may be challenging to implement due to local circumstances, empowering community planning, and local policy responses.
4. Our members would like to see more direction and focus on infrastructure delivery, which continues to be the major obstacle to investment and inclusive economic growth. As stated above it is vital that NPF4 takes account of these challenges and ensures that the electricity infrastructure is provided to enable development and allow the provision of low and zero-carbon energy.
5. We agree that it is right to place the identification of needs as the priority although this is frequently contentious, especially in the residential sector. We support the reuse and renewal of existing infrastructure and buildings where feasible. Indeed, many of our members have successfully regenerated older buildings and places into modern use and beneficial occupation. We are concerned however that the Infrastructure Investment Plan hierarchy, if applied inflexibly, might lead to an unwillingness for authorities to be seen to support new development. Regeneration of older buildings is often complex and uncertain, although it can bring major community benefits.
6. There needs to be a holistic assessment of infrastructure investment and how it will influence the successful attainment of building sustainable places, transform to net-zero carbon emissions and support an inclusive economy. The indicators need to be varied - housing needs and demand, including longer term healthcare provision; data needs and demand; changes in air travel and tourism, educational and utility requirements. Average distances travelled for shops, work and active travel would also be a metric that will inform this and future infrastructure investment plans. The success or otherwise of recurring investment in places and infrastructure should also be an indicator. These indicators should be employed to assess the implementation of NPF4.
7. Our members are also of the view that a new perspective should be considered for estimating the overall impact of new infrastructure investment. For example, a new local school or hospital may 'cost' in terms of emissions caused by new construction activities (and financial investment). But this new local infrastructure will also save emissions in the long term through avoiding people being forced to travel long distances by car to send children to school or for hospital visits. As well as quality of life, there is the possibility of significant greenhouse gas savings through these forms of localism, but there may need to be an initial investment in new social infrastructure to make localism a reality.
8. The real estate sector is a key catalyst for jobs, investment and creating places to support the economic recovery. For every £100m of new demand for commercial property, the sector creates an additional £73m for the wider Scottish economy. The SPF is committed to ensuring that the positive impact that the real estate sector delivers for local communities continues. Our members also attract and deliver major investment and finance for Scottish real estate on a global basis for all forms of property, as well as through traditional sources such as major banks and pension funds based in the UK.
9. We suggest a three-pronged approach to support the recovery of our built environment:

1. Introduce measures to support new property development and the regeneration of existing buildings to be brought back into effective use.
2. Deliver key infrastructure to drive new growth and accelerate change in the use and occupation of our built environment.
3. Support for adaptation to sustainable energy supply and sustainable buildings in the property sector, to aid the achievement of a net-zero built environment.

Questions - Part 2 - National developments

19 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?

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?:

We understand that Homes for Scotland are of the view that the delivery of new housing should be recognised as a national development. This suggestion may warrant some further consideration with the aim of delivering high quality housing developments to address the housing crisis.

20 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?

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?:

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

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

One concern we have for our members is that developments proposed in areas connected to the national development proposals will have additional requirements placed on them as part of the planning application process. This could be a significant challenge for a significant number of applicants due to the considerable geographical coverage of a number of the national developments proposed. We feel that there should be central support to support applicants caught by national development requirements.

Questions - Part 3 – National Planning Policy

22 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?

Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions? :

1. Sustainable economic development should be the guiding principle. Otherwise, the government will have a planning system incapable of supporting the country to transforming the economy to sustainable growth needed to support an ageing population, rejuvenating our town and city centres and building new affordable homes to name but a few policy concerns.
2. Plans must be effective and prepared quickly to provide businesses and communities with confidence in future decision-making. They must also be altered quickly if circumstances change. This will require a high input of public subsidy, large scale local authority/ government delivery of infrastructure and development sites. In this regard, Policy 1 does not set the right tone for the remainder of the plan. As the first of the national policies, Policy 1 needs to provide a commitment to the delivery of achievable outcomes that are within its sphere of influence. The use of terms which are open to interpretation such as "seek to achieve", "long term public interest", and the inclusion of 17 complex U.N outcomes and goals, sets the system and LDPs up for failure. In turn, we believe that this will affect confidence in the planning system to deliver measurable outcomes that are clear to business and communities.
3. The bold text appears to restate the purpose of planning from Section 3ZA of the Town and Country Planning (Scotland) Act 1997 (introduced by the Planning (Scotland) Act 2019). This is problematic as the wording in Policy 1 narrows the definition of the purpose of planning and what is in the long-term public interest to Scotland's national outcomes and UN Sustainable Development goals only. The statutory definition is broader than that and takes precedence.
4. The 'Nature Crisis' would benefit from a definition within NPF4 given it is a core theme within the document and the central plank of Policy 3.

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

Do you agree with this policy approach?:

1. Our members support promotion of a plan-led, effective, and supported planning system. However, given the effect of the COVID pandemic, some flexibility will be required around change of use and assistance in reaching decisions based on priorities.
2. The SPF has long supported the Place Principle and welcomed the introduction in the 2019 Act of the concept of Local Place Plans in the Scottish Planning system. The delivery of high-quality community facilities in response to a community's needs is key to placemaking. To improve local biodiversity and reduce environmental impact, work at a national level is required on public and utility infrastructure. Many domestic and urban areas could have significantly improved air quality if electric and low carbon transport is planned and implemented properly. This requires a local authority or government masterplan level of implementation for the successful achievement of this aspiration.
3. Our members have strong concerns that it is unclear how Regional Spatial Strategies will feed into NPF4, despite featuring heavily in the debate during the passage of the 2019 Planning Act. Our members are firmly of the view that they are still very vague in nature and have expressed concern that participation by local authorities is voluntary.

24 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?

Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency? :

1. The SPF supports the government's target for Scotland to become net-zero carbon by 2045. Planning will play an important part in ensuring that the built environment helps contribute to wider efforts across all sections of society.
2. We are firmly of the view that Scotland can only meet its climate change targets if it continues to have a successful, inclusive, and sustainable property industry that can provide a built environment that meets the needs of people and businesses. Our members, and the wider property industry, are undertaking extensive research and investing significantly in increasing the sustainability of the built environment and contributing to reaching the Scottish Government's target of net-zero by 2045.
3. The use of electricity is, however, essential to our national ambitions to achieve net-zero carbon, especially with respect to the electrification of heat. It is, therefore, vital that every development can source electricity to meet the needs of the occupiers and that sufficient electricity is also available to allow retrofit of existing properties as appropriate. For this to happen, NPF4 needs to incorporate a policy environment that is supportive of planning positively for the development of new generating capacity, both on a large scale and locally generated renewables such as small scale solar and wind. The development of generating capacity to support the zero carbon ambitions extends well beyond the planning requirements of a single development and should be a priority at local and national level. NPF4 must make the essential links with energy strategies and infrastructure investment planning to

ensure that the route to zero carbon is co-ordinated and ultimately successful.

4. Capacity of the grid should be a priority at both local and central government levels to support the electrification of the Scottish economy, and to ensure that the network can support the increased load from electric vehicles, zero-carbon heat, and locally generated renewable energy.

5. SPF considers the proposed strengthening of policy to reuse the existing building stock to be unbalanced and presents a one-sided view. To use Scotland's resources overall in the most sustainable way, every site should be assessed on its merits. It may be worthwhile re-using existing buildings, or better use may be made of scarce development land by intensifying the use and where this is the case, this ambition could be opposed because of a blanket re-use policy. The aim should be to develop sustainably, and in some cases, this will involve the re-use of buildings and in others, this will not present the most sustainable alternative. A concrete framed building designed and built to last 50-60 years may be reaching the end of its useful life and its re-use may not serve anyone's interests. The re-use of existing buildings, as a blanket preference, does not appear to our members to be the second most key opportunity for Scotland's economic health.

6. If further assessments in planning are considered mandatory, they should be implemented with a clear understanding of what the aim is, what the appropriate measures will be, and who has the expertise to assess their validity. Consideration should also be given to the additional costs to the industry and the public sector.

7. The SPF is concerned that the remit of planning in the NPF, which is largely spatial, should not be the place for the specification of materials. Building regulations are the more appropriate place for the setting of standards to drive down emissions from buildings. It is unclear how a planning officer would be able to make decisions on the appropriateness of the fabric of a building.

8. We agree with the overall intent of the policy. However, it is highly subjective as currently drafted and is lacking in any measurable targets. Much more guidance is required on what is to be measured and what is required from the sector. It is well established that new housing that encompasses low carbon technology is imperative to Scotland achieving its net zero target by 2045 (for example see Policy 9: "...to help tackle climate change, we will need more energy efficient, net zero emissions homes") It follows that NPF4 should not just say that the Global Climate Emergency must be given significant weight in considering all development proposals. It should be more explicit that the provision of the low carbon technology itself must be afforded significant weight in the decision-making process precisely because it is imperative to (the broader objective) of addressing the Global Climate Emergency.

25 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?

Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis? :

The 'Nature Crisis' would benefit from a definition within NPF4 given it is a core theme within the document and the central plank of Policy 3.

26 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?

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? :

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

Do you agree that planning policy should support community wealth building, and does this policy deliver this? :

1. Our members are concerned that many of the proposals in the draft NPF4 are aspirational and laudable but have not been expressed as a spatial concept. For example, it is not clear how the proposals for community wealth building will be interpreted by investors and even individual Local Development Plans proposals, or how this would be applied in decision-making terms by different local authorities.

2. "Community wealth building" would benefit from a definition within NPF4 given it is a core theme within the document and the central plank of Policy 5.

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

Do you agree that this policy will enable the planning system to promote design, quality and place? :

1. The property industry has emphasised the importance of placemaking for some time now, and green and blue spaces are important elements of how this is done. Our members are firmly of the view that no matter how well designed and constructed a town centre is, the major factor in how it performs will be how it is used and whether it is seen as a desirable destination where people want to spend time.

2. The Place Principles are key to providing a successful response in the Planning System to the country's recovery from COVID-19. At this important juncture it is essential that NPF4 provides a framework of the key principles of good practice in the context of spatial planning on workplaces and locations.

3. Planning has begun to focus on the concept of 20-minute neighbourhoods, arising from largely urban models in other countries. There is a significant attraction in planning terms to ensuring that people are connected to the facilities and services that they require and that they can reach these using active travel methods. When we refer to 20-minute neighbourhoods, we then need to be clear what we mean by the concept, where it is appropriate to apply it, and once applied how it will influence development management decisions for individual development sites. Without this definition, there could be uncertainty within the real estate industry about what is required to achieve an effective 20-minute neighbourhood, and what a planning authority would expect to see included.

4. The pandemic has accelerated market trends reducing the need overall for retail properties including shopping centres and department stores. Before COVID-19 there was already clear market distress in these asset classes. Throughout the lockdowns this stress has crystallised, and many of these premises are now struggling to continue in their former capacities. In addition, previously favourable alternative uses for leisure purposes such as hotels or restaurants are now likely to be more difficult to attract market interest in the short term. In many cases, the alternative use may be residential, and this will engender wider considerations of place and infrastructure provision in these locations. NPF4 should encourage and support planning for change and promote mixed uses in town centres.

5. NPF4 must also focus on the role of Scotland's city centres and workplaces as key drivers of the economy. Scotland's cities are not really given any prominence and their important role should be recognised.

6. It will also be important for the NPF to consider, in relation to wider government priorities on sustainability, the implications of changing demographics within society, the need for later life healthcare, and the facilities that communities will require across all age ranges. There has been a trend towards the centralisation of healthcare facilities, at the expense of well distributed primary and secondary healthcare facilities in communities, and the delivery of state-supported later life facilities within the NHS. In the aftermath of the COVID-19 crisis, some of our members have suggested that a new national strategy, to be recognised in NPF4, could address these issues as key elements of the Place Principles.

7. Policy 6(a) states: "Development proposals should be designed to a high quality so that the scale and nature of the development contributes positively to the character and sense of place of the area in which they are to be located." SPF strongly supports this statement, however, the language used is subjective. In order for there to be consistency across each LA it is essential there is a clear and objective approach to design. It appears that the latter part of the sentence is intended to inform what would constitute "high quality" development in the first part of the sentence. To that end the reference to "high quality" serves no discernible purpose in this policy and can be deleted. The sentence should simply read: "Development proposals should be designed...so that the[ir] scale and nature...contribute positively to the character and sense of place of the area in which they are to be located".

8. We have concern with Policy 6(b) in that the documents referred to in bold print are considerably out of date e.g. Designing Streets 2010, Creating Places 2013. There already exists an inconsistency of approach to the named documents and it is not clear how this policy will address this.

9. Generally, there is considerable amount of language used in this policy that is subjective and open to different interpretations e.g. reference to "sense of joy".

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

Do you agree that this policy sufficiently addresses the need to support local living? :

1. Planning has begun to focus on the concept of 20-minute neighbourhoods, arising from largely urban models in other countries. There is a significant attraction in planning terms to ensuring that people are connected to the facilities and services that they require and that they can reach these using active travel methods. When we refer to 20-minute neighbourhoods, we then need to be clear, we mean by the concept, where it is appropriate to apply it, and once applied how it will influence development management decisions for individual development sites. Without this definition, there could be uncertainty within the real estate industry about what is required to achieve an effective 20-minute neighbourhood, and what a planning authority would expect to see included.

2. Our members are concerned that the requirement for new development to be located within the definition of a 20-minute neighbourhood is unnecessarily restrictive. If taken to its fullest definition, this would mean that a person should be able to leave their residence and within a 20-minute walk reach all of their social, health and economic requirements. This may not always be feasible in the context of city centre sites and again, the approach could conflict with potential regeneration of, for example former city centre offices or large industrial premises. In many locations, the concept of 20-minute neighbourhoods is at odds with the rural setting and local demand for housing in less urbanised settings. The policy must be more explicit that it must be applied flexibly or is only relevant in respect of development proposals in urban settings.

3. If the requirement for development is rigidly required within town and cities' planning policies to meeting all of the tenets of a 20-minute neighbourhood, then we fear that the consequence could be that investment is attracted to alternative locations and regeneration projects could simply not happen. The requirement for a minimum 35% affordable housing contribution for example in the Edinburgh City Plan for all forms of development will also, we fear make commercially led development projects simply unviable. The consequence could be a city that could struggle to attract sufficient new employment, leisure, build-to-rent or purpose-built student accommodation to meet the needs of the future. There needs to be greater flexibility with this requirement, otherwise development may simply become unviable.

4. The pandemic has accelerated market trends reducing the need overall for retail properties including shopping centres and department stores. Before COVID-19 there was already clear market distress in these asset classes. Throughout the lockdowns this stress has crystallised, and many of these premises are now struggling to continue in their former capacities. In addition, previously favourable alternative uses for leisure purposes such as hotels or restaurants are now likely to be more difficult to attract market interest in the short term. In many cases, the alternative use may be residential, and this will engender wider considerations of place and infrastructure provision in these locations. NPF4 should encourage and support planning for change and promote mixed uses in town centres.

30 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?

Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?:

1. Our members agree that planning to meet infrastructure needs is the way planning for development should proceed. The various concepts such as 20-minute neighbourhoods and living locally should not be confused with planning to meet the need for housing, employment and the appropriate infrastructure required to facilitate new development. The tendency for the planning system to perpetuate the idea that the need for infrastructure arises

as a consequence of development, rather than to meet the overall needs of society should be avoided. Individual developments can rarely fund major infrastructure such as schools from land value uplift and the need for them should be recognised as arising from the patterns and needs of the whole population. People generate the need for infrastructure, development does not.

2. NPF4 should identify growth areas and coordinate this with infrastructure plans. We believe the identification of Masterplan Consent Areas (MCAs) in NPF4 could support the alignment of development processes and increase delivery of both housing and commercial developments. MCAs could be particularly useful for large and complex mixed-use development sites that are established sometimes over decades. Over a timescale of this order, there could be many requirements for changes in technical standards or indeed of markets, and so long as the principle of development is established and approved, then MCAs can help to de-risk a complicated development process.

3. We have long supported the concept of an infrastructure led approach to development planning. This does not mean that planning authorities should not support appropriate windfall sites as they become available. But key strategic infrastructure must be planned for, and this will frequently need to be planned on a cross-boundary basis. If the infrastructure first policy were to be successful there would need to be collaboration and trust between local authorities and developers, and a sharing of burdens and risk. It is important that development should not be viewed by communities as being imposed on them and that an infrastructure first led approach to development planning could be crucial to avoiding such perceptions.

4. Our members see that education and public transport, particularly rail, will reach challenging levels of demand and stress on many services that are already stretched to capacity. The drive for core employment locations has led to significant transport challenges, including East Lothian to Edinburgh train services, and the M8 between Edinburgh and Glasgow.

5. The SPF would like to see better co-ordination of infrastructure planning to avoid shortfalls in capacity in high demand areas for homes and employment locations. It will also be important to avoid situations where infrastructure is provided without near-term demand for its services. The Infrastructure First approach has long been a requirement across all forms of infrastructure provision, but the principle is now being exacerbated by the need for sustainable energy generation and distribution led by appropriate government policy and investment to deliver the kind of place making that NPF4 seeks to achieve.

6. We believe the key policy will be to embed transport implications in future land use plan making. This should support the delivery of the wider objectives identified above for the purposes of future placemaking. There is little doubt however that innovation and investment will be needed to address existing communities and transport networks, in the light of the National Transport Strategy and the challenges it will be prioritising, such as climate change.

7. District heating and ground source heat pumps are expected to play a larger part in the way that homes and businesses are heated. However, it is important not to underestimate the challenges that this will bring. Unlike more traditional forms of heating, these require greater infrastructure and space to operate, and this will have an impact on the way that new developments and communities are planned. While an important part of the future energy mix, our members have previously expressed concern about being required to provide district heating systems (as a planning requirement), which in some sites can be problematic to achieve because it would require infrastructure to be built under railways or roads that the developer has no control over. This can lead to costly delays and affects the viability of much needed homes and commercial space. It is important that there is flexibility in the planning system and acknowledgment that 'one-size-fits-all' is not appropriate.

8. Meanwhile, air source heat pumps may also be increasingly used to replace boilers in homes that are currently powered by fossil fuels. While these require less space than other forms of low and zero-carbon heating, there could be implications for listed buildings or those within conservation areas.

9. Housing will also be a key issue for infrastructure as people seek higher quality places to live with access to public transport, amenities, and local services. New housing development also brings allocations for affordable housing which contributes to inclusive economic growth. The move towards mixed-use development does also engender more economic opportunities across a wider variety of business or leisure services. Key infrastructure will include high speed broadband, schools, public transport, power, and water. Green networks and open spaces will become more important for developments with significant residential elements.

10. The current infrastructure stock is struggling in areas of high demand. Even where new infrastructure is provided there are significant pressure points as demand simply outstrips infrastructure capacity, particularly with schools. Indeed, some of our member companies advise us that they are being restricted from selling houses by planning authorities due to a need to limit the potential growth of school demand in certain areas of Scotland. The system of developer contributions is unable to fund such major items of infrastructure, the demand for which is part of the overall need, not directly driven by the development itself.

11. It is also important that transport agencies and authorities take steps to deal with location of high demand. Although there is now a plan for Glasgow Airport to improve its connections to its wider metro area and major public transport networks, the current situation is not sustainable and requires early investment to meet the challenges identified by the National Transport Strategy.

12. Our members are of the view that consideration needs to be given to how large-scale infrastructure can be delivered "first" when the mechanism for funding it is other development (particularly housing) that is supposed to "follow" the delivery of the infrastructure. The Scottish Government must be more forthcoming about how it will fund infrastructure that will act as a catalyst for further development and how it intends to recover that initial capital outlay (including from development that "follows" the delivery of new infrastructure).

13. The legal requirements related to planning obligations are also plainly a barrier to delivering meaningful large-scale infrastructure given it is difficult to establish that major new infrastructure is required to mitigate local development, and there is a prohibition on the pooling of financial contributions towards new large-scale infrastructure. The consequence is financial contributions are funnelled towards piecemeal local infrastructure rather than transformational new infrastructure (particularly but not exclusively new transport infrastructure).

14. NPF4 makes no attempt to address this issue or align policy with changes proposed under the Planning Act (Scotland) 2019 (notably the infrastructure

levy) or other forthcoming legislative priorities including in respect of land value capture. These legislative tools are expected to come forward in the next 3 – 5 years, yet NPF4 (the national planning policy for the next 10 years) fails completely to grapple with their existence and how they will support the development goals contained therein. There must be a more joined up approach to how infrastructure will be funded and delivered. An “infrastructure-first” policy otherwise looks purely aspirational and is unlikely to drive any meaningful change compared to existing planning policy.

31 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?

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?:

1. Policies for new housing must be considered holistically, as our members are presented with a range of policies that have a tendency to conflict such as increased densities; increased biodiversity; increased open space; the need for sustainable generating capacity; more affordability; ultra-low carbon building; reduced car use (which means people need somewhere to leave their cars whilst they use public transport); the addition of the ULEV charging network; and a spread of aspirations which can work against one another.

2. Scotland is still in the grip of a housing crisis, and therefore more housing requires to be delivered across all tenures. The policy should also formally recognise the housing crisis exists in the same way as policy throughout NPF4 acknowledges that there is a climate crisis and nature crisis. The extenuating circumstances of the COVID-19 pandemic has had a continuing negative impact on the whole housing delivery cycle. If we are truly committed to the six statutory outcomes set out in the Planning (Scotland) Act 2019, it is vital that consideration is given to an upwards adjustment of housing need and demand, and corresponding minimum Housing Land Requirements, in whatever overall figure is provided in NPF4.

3. Our members support the intent that the level of housing land once written into NPF4 can be exceeded in the LDPs. It is important that there is as much evidence on housing need and demand included to inform this as well as the growth potential of settlements. These must be targets for homes to be delivered, not simply the amount of land allocated for housing.

4. The challenges of assessing housing needs are generally more understood in the major population centres but can be more complex in remote/rural areas, where loss of population and issues with second homes can have significant impact on housing supply and demand. Our members are of the view that there needs to be a balance between supporting the sustainable growth of rural communities along with the provision of suitable local amenities to make them self-sustaining.

5. There is an absence of economic or financial factors that can be major drivers in housing need and demand, which is also linked to tenure. Housing delivery, of all tenures is dependent on a range of public/private funding models. Recognition of the economic drivers that generate the need for housing must be considered.

6. The requirement for a 35% minimum affordable housing contribution as suggested in the Edinburgh City Plan will make some forms of development unviable in cities. This policy will be an obstacle to much needed investment in the purpose-built student accommodation sector and the nascent build-to-rent sector. We propose that 35% should be an aspiration, flexed to adapt to different projects and is not a minimum requirement.

7. The current drafting of the Policy 9(h) states that “proposals for market homes should generally only be supported” where they include at least 25% affordable provision but that “a lower contribution may be appropriate” where it has been “determine[d] in local development plans”. The current wording suggests that, at the point of the determination of the planning application, the 25 % provision would need to be applied unless there was adopted LDP policy that permitted a lower provision. Our members are of the view that discretion to permit a lower provision in LDPs must equally be available to planning authorities in determining an individual application even where there is no LDP policy in place to that effect, but the same compelling reasons for accepting a lower provision apply in respect of a particular development (viability, small-scale developments). It is important that this is clarified in the adopted version of NPF4 so that the 25% minimum provision is not applied blindly in the absence of adopted LDP policy and at the expense of delivering much needed market housing that has good reasons (consistent with the examples identified in Policy 9h), for delivering a lower level of affordable housing.

8. To centralise the housing forecasting system, it is important that there is a clearer articulation between housing investment and inclusive growth. It is critical that the economic benefits from increased home building, such as productivity gains and employment opportunities, are considered. New housing will also support the ambitious transition towards a net zero carbon economy through greatly increased efficiency and zero carbon heating and cooling.

32 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?

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

1. There are many challenges to building the infrastructure needed to achieve long-term aspirations, in particular the demands on the commuter rail networks and road congestion. This last challenge is seen prominently at peak commuter times in Edinburgh and Glasgow, but it is also a severe challenge at times in more rural locations, where there is often little choice in road transport and the need for HGVs to move goods through communities between agricultural or commercial locations. This can be highly disruptive for small towns on A roads, for example along the A77 Ayrshire coast or around the Longman Industrial Estate roundabout near Inverness.

2. Our members see education and public transport, particularly rail, will reach challenging levels of demand and stress on many services that are already stretched to capacity. The drive for core employment locations has led to significant transport challenges, including East Lothian to Edinburgh train services, and the M8 between Edinburgh and Glasgow.

3. As previously stated, our members believe there will be an increasing emphasis upon destination and placemaking as investors and people look for quality places to invest in, live, work and play. Before COVID-19 there were certain consumer demands that were driving infrastructure requirements. If

sustained this will require greater provision of charging points for electrical vehicles but may also see continued changed demand for parking provision. For example pre-COVID there was a move for newer office developments in city centres to include less car parking for employees and more space for cycle parking instead. Safe cycle networks must be planned in, to facilitate greater cycle use. Public transport is also likely to come under growing demand for its services and this must be planned for appropriately, as part of Scotland's long-term spatial plan.

4. As transport becomes increasingly electrified there will be a need for many more electric charging points for cars. The National Planning Framework must take into consideration the impact on the electricity grid that such infrastructure has, as well as the impact on the energy efficiency of new developments. Our members have noted that adding car charging points can have the unintended consequence of reducing the energy performance scoring of non-domestic buildings.

5. The pandemic has accelerated the demand for strong distribution and logistics facilities, as deliveries of goods becomes more the rule than the exception of modern consumer habits. The provision of sufficient places for storage and distribution of goods across a greater number of locations will need to be catered for in future place-making proposals.

33 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?

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

1. District heating and ground source heat pumps are expected to play a larger part in the way that homes and businesses are heated. However, it is important not to underestimate the challenges that this will bring. Unlike more traditional forms of heating, these require greater infrastructure and space to operate, and this will have an impact on the way that new developments and communities are planned. As an example, our members are experiencing a lack of consistent guidance on how publicly adopted areas, such as roads and rail, could potentially be shared with district heating networks, but there is as yet no defined policy on how shared space of this type would work.

2. While an important part of the future energy mix, our members have previously expressed concern about being required to provide district heating systems (as a planning requirement), which in some sites can be problematic to achieve because it would require infrastructure to be built under railways or roads that the developer has no control over. This can lead to costly delays and affects the viability of much needed homes and commercial space. It is important that there is flexibility in the planning system and acknowledgment that 'one-size-fits-all' is not appropriate.

3. Air source heat pumps may also be increasingly used to replace boilers in homes that are currently powered by fossil fuels. While these require less space than other forms of low and zero-carbon heating, there could be implications for listed buildings or those within conservation areas.

4. As previously stated, electrical power is becoming increasingly important to our ambitions to achieve net-zero carbon and we expect this trend to continue. It is, therefore, vital that every new residential and non-domestic property has access to a reliable electricity supply and, in order to achieve this, that the generating capacity is identified and planned for and that the grid can handle the increased load that the electrification of heat will entail. Capacity of the grid extends well beyond the planning requirements of a single development and should be a priority at both regional and national levels.

5. There must be greater emphasis on the ability to feed into the grid via locally generated renewables such as solar or wind. Our members have reported a conflict between wanting to be able to create renewable energy in their developments but being unable to because the grid does not have the capacity to receive it. Greater consideration must be given of the opportunities and need for the decentralisation of electricity production.

6. It is vital that planning policy takes account of these challenges and ensures that the electricity infrastructure is provided to enable development and allow the provision of low and zero-carbon energy.

7. The potential for alternative heating solutions not yet designated in policy must also be taken into account when allocating land. This is important given the potential for alternative sustainable technologies to come forward. A flexible approach is also needed given the passage of time between the adoption of LHEES and HNZ and the allocation of housing land in LDP's.

8. SPF supports the principle of designing and constructing development proposals to connect to adjacent existing heat networks. However, the current policy is too prescriptive. Some flexibility must be afforded taking into account practical and viable constraints, and the potential for delivery of essential new housing utilising alternative sustainable heating solutions.

34 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?

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?:

1. We agree that provision or maintenance of green or blue spaces should be encouraged and facilitated within appropriate developments. There should not, however, be a 'blanket' approach to requirements, as these will differ, depending on the location of developments. For example, the requirements for high density city centre flats will not be the same as for family housing in suburban areas.

2. In Policy 12(a) the words "Development allocations should be chosen..." could be misinterpreted as directing local authorities to treat an areas contribution to green networks and priorities as a "deciding factor" when allocating land. We recommend that this is re-drafted to state: "Development allocation should take into account the areas that..."

3. In Policy 12(f) the need to replace the loss of children's outdoor play provision "within the development proposal" is too prescriptive and this wording

should be deleted. It dismisses the potential for new development proposals to maintain or enhance provision within the vicinity of new development that would mitigate any loss associated with the development.

35 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?

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?:

Our members are of the view that the second sentence of Policy 13(a) should be amended to specify that "New development proposals in flood risk areas, or which can impact on flood risk areas, should be avoided unless robust mitigation has been identified".

36 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?

Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?:

1. The COVID-19 crisis has meant that we are facing more challenges, arguably, than at any point in our existence. To best address this, we need to direct our resources and efforts into the areas where we can deliver the greatest impact.
2. While we see all the Priorities and Outcomes in the National Performance Framework as important, we would suggest that NPF4 must pay significant attention to driving the delivery of the economic priorities, because without a successful economy Scotland will find it is increasingly difficult to deliver the wider vision for inclusivity and well-being.
3. Whilst our members support the introduction of an overarching principal policy that puts the needs of people and their health and wellbeing at the heart of the planning system, we have concerns as to how potential health impacts from new development are to be assessed as part of the planning process. The proposed policy indicates that an evidence-based approach will be embedded. Our members have questioned what types of health impact assessments will be required for new developments, over and above studies such as air quality assessments and noise impact assessments.
4. Clarity will be needed on any policy that requires submission of evidence for either certain types of new developments, that may for example affect air quality, or those within defined local authority Air Quality Management Areas. The costs to the development industry involved in preparing the evidence to support planning application submissions are already high. Our members are therefore concerned about potential further additional supporting technical studies being made mandatory, particularly where the actions arising from them may not be within the remit of the development proposed.

37 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?

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?:

1. We welcome the aspirations to direct new development towards brownfield rather than greenfield land, to bring forward mixed-use developments and to support the concept of 20-minute neighbourhoods. But we fear the prescriptive approach could be counterproductive. Its provisions could conflict with the objectives of delivering more affordable homes, economy recovery and indeed, regenerating the city economy and core places, as we seek to recover from the pandemic.
2. Brownfield first is already supported by current Scottish Planning Policy. This stipulates that brownfield sites should first be considered. Our concern is that by prescribing that new development must be directed towards brownfield sites, there is a risk of inadvertently losing, or significantly delaying, the opportunity to develop new communities, as well as business opportunities.
3. A brownfield site is not always a viable option for development without very significant long-term remediation, or infrastructure investment. If brownfield sites are not viable, but insisted upon by planning policies, this would conflict with the intended purpose of delivering more homes. This includes affordable homes as well as related employment opportunities and community facilities. It needs to be considered in relation to locations where people wish to live. The SPF's view is that sustainability is about more than resolutely protecting greenfield sites.
4. Policies must also enable and not deter development proposals that are financially sustainable and that can be delivered successfully, at the right time to meet the needs of the businesses or communities the development is intended to support.
5. The intention to direct new development towards brownfield land should retain the current SPP requirement for brownfield to be considered first. Without this flexibility, towns and cities are constraining their own ability to support new developments in non-brownfield locations that could bring forward new homes and business premises much earlier than an alternative brownfield site could achieve.

Questions - Part 3 - National Planning Policy continued

38 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?

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?:

No comment

39 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?

Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?:

No comment

40 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?

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?:

1. While an important part of the future energy mix, our members have previously expressed concern about being required to provide district heating systems (as a planning requirement), which in some sites can be problematic to achieve because it would require infrastructure to be built under railways or roads that the developer has no control over. This can lead to costly delays and affects the viability of much needed homes and commercial space. There are also challenges around the heat source and the availability of back up capacity for both failures and planned maintenance. It is important that there is flexibility in the planning system and acknowledgment that 'one-size-fits-all' is not appropriate.

2. The use of electricity is, however, essential to our national ambitions to achieve net-zero carbon, especially with respect to the electrification of heat. It is, therefore, vital that every development can source electricity to meet the needs of the occupiers and that sufficient electricity is also available to allow retrofit of existing properties as appropriate. For this to happen, NPF4 needs to incorporate a policy environment that is supportive of planning positively for the development of new generating capacity, both on a large scale and locally generated renewables such as small scale solar and wind.

3. The development of generating capacity to support the zero carbon ambitions extends well beyond the planning requirements of a single development and should be a priority at local and national level. NPF4 must make the essential links with energy strategies and infrastructure investment planning to ensure that the route to zero carbon is co-ordinated and ultimately successful. Capacity of the grid should be a priority at both local and central government levels to support the electrification of the Scottish economy, and to ensure that the network can support the increased load from electric vehicles, zero-carbon heat, and locally generated renewable energy.

4. District heating and ground source heat pumps are expected to play a larger part in the way that homes and businesses are heated. However, it is important not to underestimate the challenges that this will bring. Unlike more traditional forms of heating, these require greater infrastructure and space to operate, and this will have an impact on the way that new developments and communities are planned. Their operating costs can also be significant and can exacerbate risks of fuel poverty, potentially creating one problem, whilst solving another.

41 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?

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?:

1. SPf agrees with Policy 20(b) that new development proposals should follow the waste hierarchy and adopt the circular economy principles. Our members support the principle that new waste infrastructure and facilities must only be supported where they would have no unacceptable impacts (including cumulative) on the residential amenity of nearby dwellings, local communities and historic environment assets. The policy should more clearly distinguish between the need for residential development proposals to provide "at source" segregation, storage and collection facilities and the need for "local" recycling and waste management facilities.

2. Our members are of the view that there needs to be more guidance on the use of materials with the lowest forms of embodied emissions. What level of detail will be requested at planning application stage? It is not clear what level of embodied carbon is deemed acceptable or not and therefore this policy risks causing delay and uncertainty to the planning system. Are LAs equipped/skilled to deal with these matters? This policy also needs to take into account the implications of the preferred brownfield strategy i.e. impact of demolitions needs to be considered.

3. Policy 20(d) specifies that residential development proposals must "include provision for "at source" waste management "through...appropriate recycling and localised waste management facilities". The policy should be clear that residential development proposals "should be supported by" appropriate recycling and localised waste management facilities rather than "include provision" (which indicates that an "on-site" solution is required).

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

Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?:

No comment

43 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?

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?:

No comment

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

Do you agree that this policy ensures all of our places will be digitally connected?:

1. The prioritisation of digital connectivity so that people can work effectively from home would allow remote working in rural areas and create more demand for businesses and services in these areas. This would encourage the use of local services and facilities within these settlements rather than on a commute to or from work. There has been a significant increase in people seeking out rural properties through COVID and that will presumably continue generally but requires efficient home working.

2. By its nature, digital transformation is heavily reliant on fast changing technologies. The financial impact of the provision of digital infrastructure across all regions should be recognised in NPF4 as a national strategy with the ability and flexibility to adapt as technology evolves over the duration of NPF4 and future national planning frameworks.

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

Do you agree that these policies will ensure Scotland's places will support low carbon urban living?:

1. As previously stated, our members build Scotland's workplaces, homes, shops, schools and other facilities and the infrastructure that serves them. The SPF is committed to ensuring that the positive impact that the real estate sector delivers for local communities and our cities continues. It is people who generate the need for infrastructure, and no matter how well designed and constructed a town centre is, the major factor in how it performs will be how it is used, and whether it is seen as a desirable destination where people want to spend time.

2. The draft NPF4 is also in danger of applying the town centre first principle as a blunt instrument. This potentially conflicts with other intentions to support the sustainable development of places outside of traditional urban centres. For example, residential led developments outside or on the periphery of town centres which are nonetheless now long established. Development located to such places may bring enhanced employment and reduce carbon emission through their co-location with housing. Similarly retail parks and other outlets are possibly major employers in less urban districts and a failure to be able to reinvest or support their business could actually undermine policies otherwise designed to support more rural locations. As we argue with other policy principles, the town centre first principle must not become a blunt instrument that erodes rather than supports communities. Planners should be supported to assess each case on its own merits and able to balance competing policy priorities.

3. The pandemic has accelerated market trends reducing the need overall for the number of retail properties including shopping centres and department stores that previously dominated our high streets. Before COVID-19 there was already clear market distress in these asset classes. Throughout the lockdowns this stress has crystallised, and many of these premises are now struggling to continue in their former capacities. In addition, previously favourable alternative uses for leisure purposes such as hotels or restaurants are now likely to be more difficult to attract market interest in the short term. In many cases, the alternative use may be residential, and this will engender wider considerations of place and infrastructure provision in these locations. NPF4 should encourage and support planning for change and promote mixed uses in town centres.

4. NPF4 must also focus on the role of Scotland's city centres and workplaces as key drivers of the economy. Scotland's cities are not really given any prominence in NPF4, and their important role should be recognised.

46 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?

Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings? :

1. While we agree that existing resources should be encouraged as far as possible, there are sound economic and design reasons why this may not be achievable in many cases. This is particularly the case for the non-residential sector where buildings are often designed for a particular use. It may also not be viable to renovate existing buildings or infrastructure due to costs, which are often significantly higher than if developers were working on a new building.

2. To refurbish and reuse existing buildings effectively, some degree of relaxation is required in the use and adaptation of heritage buildings. Many of our towns and cities contain large quantities of Victorian building stock and to refurbish these to provide modern, low carbon business premises and healthy homes, flexibility on heritage restrictions is required. While NPF4 should encourage the effective re-use of buildings with this in mind, the policy should also recognise that in some instances, the loss of heritage assets may be acceptable to deliver wider economic and community benefits. This is in accordance with the Historic Environment Scotland Policy Statement and the HES guidance on Managing Change in the Historic Environment.

3. We have had a brownfield first approach to development for a very long time, it is not new and there is a risk that overall needs are not met if we continue to allocate development sites in locations where there was no or a limited market, simply because the land is previously used. There should be an overarching need to consider the remediation and landscaping of some brownfield sites where there is no market for their development. There may be occasions where the most sustainable locations for new development may be on the edges of existing settlements where there are already facilities.

47 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?

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?:

1. Our members have suggested that there should be a fundamental review of Green Belts around Scotland's key cities including their aims/effectiveness, either on a 30-year basis, to fit in with the rolling 30-year settlement strategies or linked to growth numbers. The original purpose of Green Belts has become distorted over time and the net effect has been distended travel patterns due to land use controls that are not delivering the sort of city region

environment that is desirable, or indeed sustainable, long-term.

2. Green Belt land policy should be used as a tool to shape the growth and development of urban centres and therefore the boundaries should continue to be subject to regular review at appropriate stages consistent with the NPF and SPP. There may be occasions where the most sustainable locations for new development may be on the edges of existing settlements where there are already facilities.

3. The NPF can be used to reimagine Green Belts for the future – they have always been a tool of planning and the shaping of cities and future Green Belts may encompass the growth of cities along public transport corridors, with green wedges to structure the development, rather than an encircling ‘collar’ which has had many negative spatial planning effects as well as some positive ones.

4. The policy wording in its current form may encourage LAs to adopt a brownfield-only approach, whilst also either disincentivising them from conducting a green belt review, or only reviewing a green belt under the guise of extending green belt boundaries. The policy must recognise that green belt release may well be required to contribute to wider NPF4 policies, objectives and strategies.

5. Reference to green belts being directed towards the most “accessible” areas is concerning, as it is precisely these most accessible areas that are the most sustainable, at least in terms of public transport access. It should not be the goal of policy to restrict the delivery of sustainable sites on ideological grounds.

48 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?

Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?:

1. Our members have concerns about the presumption towards brownfield sites over greenfield sites. A particular issue relates to land assembly and the use of compulsory purchase orders, as part of regeneration projects and more explicitly the provision of housing in cities. Our members are concerned that this could have a negative impact on viable businesses that would have nowhere to relocate to, and result in lots of houses in towns and city centres but a lack of employment land, with little provision for businesses.

2. We have had a brownfield first approach to development for a very long time, it is not new and there is a risk that overall needs are not met if we continue to allocate development sites in locations where there was no or only a limited market, simply because the land is previously used. There should be an overarching need to consider the remediation and landscaping of some brownfield sites where there is no market for their development. There may be occasions where the most sustainable locations for new development may be on the edges of existing settlements where there are already facilities (as we point out in relation to the Distinctive Place policies 24-27).

3. NPF4 sets a higher bar than existed previously regarding the allocation of sites for residential development. The draft NPF4 outlines that a site should now be “deliverable”. However, there is no guidance as to where the cost burden to prove this deliverability lies. Local Authorities are significantly under-resourced and cannot deal with this increased workload. Viability of sites may be affected if the total burden of proof lies with the landowner/developer to conduct a full suite of site assessments at a very early stage. The following assessments are currently required as part of NPF4:

- Whole Life Assessments
- Evidence of enhancing biodiversity
- Evidence of consistency with 20-minute neighbourhoods
- Evidence of Community Wealth Building
- Statement of Community Benefit
- Statement on how Infrastructure First relates to the Scottish Government Investment Hierarchy
- Evidence of Net Economic Benefit
- Health Impact Assessments
- Evidence of meeting circular economy principles
- Decarbonisation Strategies

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

Do you agree that this policy will ensure that rural places can be vibrant and sustainable? :

1. The prioritisation of digital connectivity so that people can work effectively from home would allow remote working in rural areas and create more demand for businesses and services in these areas. This would encourage the use of local services and facilities within these settlements rather than on a commute to or from work. There has been a significant increase in people seeking out rural properties through COVID and that will presumably continue generally but requires efficient home working.

2. The challenges of assessing housing needs are generally more understood in the major population centres but can be more complex in remote/rural areas, where loss of population and issues with second homes can have significant impact on housing supply and demand. Our members are of the view that there needs to be a balance between supporting the sustainable growth of rural communities along with the provision of suitable local amenities to make them self-sustaining.

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

Do you agree that this policy will protect and restore natural places?:

No comment

51 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?

Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands? :

No comment

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

Do you agree that this policy will expand woodland cover and protect existing woodland?:

No comment

53 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?

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

No comment

Questions - Part 4 - Delivering our spatial strategy

54 Do you agree with our proposed priorities for the delivery of the spatial strategy?

Do you agree with our proposed priorities for the delivery of the spatial strategy?:

Aligning Resources

1. The private sector, local and central government need to work together to enable the phasing and funding of each component part of major developments. This should include different and adaptable approaches at different phases of a development with a variety of partnerships necessary between central government and its Agencies; local government service departments; and third-party infrastructure providers.

2. Attracting outside investment is going to be key to sustaining the property sector going forward. We advocate the closer alignment of private capital and government to deliver infrastructure, although, this will require a culture change in planning authorities to succeed. The emergence of City Region Deals is welcomed by the SPF and may pave the way for a much-needed greater scale of investment, but it will have to be targeted carefully throughout the regions to ensure that it is invested in areas where people want to live and work, and developers want to do business.

3. Investment in existing infrastructure will clearly be an important element of renewing and delivering sustainable places. This includes making best use of blue and green infrastructure, working with natural infrastructure or creating/adapting man made blue and green infrastructure as required, for example to adapt to flooding concerns. The SPF has consistently supported an infrastructure led approach to development planning. However, we remain concerned at the lack of a central co-ordinating authority that could guide the delivery of new infrastructure across different (and conflicting) regulators, communities, and local authority areas. This could be addressed by the proposed new Scottish National Infrastructure Company.

Infrastructure First

4. A re-activated and modern infrastructure is fundamental to a modern Scotland and large-scale national planning such as NPF4 is welcomed to achieve this. Our members have agreed with a hierarchical approach to enabling infrastructure delivery. NPF4 is a good opportunity to identify key infrastructure of national importance. However, there is a need to consider key strategic issues necessary to enabling economic growth and a low carbon economy, that cross the borders of local planning authorities (often but not exclusively transport related).

5. We have long supported the concept of an infrastructure led approach to development planning. This does not mean that planning authorities should not support appropriate windfall sites as they become available. But key strategic infrastructure must be planned for, and this will frequently need to be planned on a cross-boundary basis. If the infrastructure first policy were to be successful there would need to be collaboration and trust between local authorities and developers, and a sharing of burdens and risk. It is important that development should not be viewed by communities as being imposed on them and that an infrastructure first led approach to development planning could be crucial to avoiding such perceptions.

6. Our members see that education and public transport, particularly rail, will reach challenging levels of demand and stress on many services that are already stretched to capacity. The SPF would like to see better co-ordination of infrastructure planning to avoid shortfalls in capacity in high demand areas for homes and employment locations. It will also be important to avoid situations where infrastructure is provided without near-term demand for its services.

7. The trend towards centralisation of healthcare facilities has also, in the experience of our members, led to a breakdown in the planning of growing communities. Investment priority is understandably being given to meeting existing demand on services, but innovative forms of partnership investment must be taken forward to meet the needs of new, sustainable places.

8. Please see our comments at policy 8. As previously stated consideration should be given to how large-scale infrastructure can be delivered “first” when the mechanism for funding it is other development (particularly housing) that is supposed to “follow” the delivery of the infrastructure. The Scottish Government must be more forthcoming about how it will fund infrastructure that will act as a catalyst for further development and how it intends to recover that initial capital outlay (including from development that “follows” the delivery of new infrastructure).

9. The legal requirements related to planning obligations are also plainly a barrier to delivering meaningful large-scale infrastructure given it is difficult to establish that major new infrastructure is required to mitigate local development, and there is a prohibition on the pooling of financial contributions

towards new large-scale infrastructure. The consequence is financial contributions are funnelled towards piecemeal local infrastructure rather than transformational new infrastructure (particularly but not exclusively new transport infrastructure).

10. NPF4 makes no attempt to address this issue or align policy with changes proposed under the Planning Act (Scotland) 2019 (notably the infrastructure levy) or other forthcoming legislative priorities including in respect of land value capture. These legislative tools are expected to come forward in the next 3 – 5 years, yet NPF4 (the national planning policy for the next 10 years) fails completely to grapple with their existence and how they will support the development goals contained therein. There must be a more joined up approach to how infrastructure will be funded and delivered. An “infrastructure-first” policy otherwise looks purely aspirational and is unlikely to drive any meaningful change compared to existing planning policy.

Delivery of National Developments

11. Our members have noted the identification of 18 national developments across Scotland, which include very different scales and forms of development. Some of these were previously identified in NPF3 but there are others no longer listed despite not being fully delivered.

Development Plan Policy and Regional Spatial Strategies

12. The SPF supports promotion of a plan-led, effective, and supported planning system. Our members believe there will be an increasing emphasis upon destination and place-making as investors and people look for quality places to invest in, live, work and play. An efficient planning system including with an effective and reliable pre-application process can enable development and investment in our economy.

13. Our members are concerned that many of the proposals in the draft NPF4 are aspirational and laudable but have not been expressed as a spatial concept. There are several unclear/ambiguous terms that require to be clarified prior to NPF4 being adopted for example “Community Wealth Building”, “Rural Places”, and “Small Sites”. It is not clear how the proposals for community wealth building for example will be interpreted by investors and even individual Local Development Plans proposals, or how this would be applied in decision-making terms by different local authorities.

14. Positive policy is required to set out the role that Planning Authorities and Statutory Consultees must have in supporting a low carbon economy, particularly in the wake of the COVID emergency. In its current form there is a risk that NPF4 could limit development rather than enable it. There remains a risk of tension between policy principles that gain support at national level but may be challenging to implement due to local circumstances, empowering community planning, and local policy responses.

15. We welcome the introduction of national targets for housing in NPF4, although would reiterate the point that these must be targets for homes to be delivered, not simply the amount of land allocated for housing. It will be very important that the preparation of the RSSs and the other methods of collecting land for housing must include the development industry. The industry must be engaged and allowed to influence the allocation of housing delivery targets to the local authorities, as these targets are clearly of significant importance in terms of delivering more housing across all tenures. While the detailed provisions in the Planning (Scotland) Act relating to older and disabled people are laudable, further detailed provisions relating to all tenures are also needed.

16. Our members are firmly of the view that Scottish planning policy should be worded to ensure that development plans contribute to sustainable development, and that a presumption towards sustainable development is core to the policy within all development plans. This goes beyond housing and impacts on commercial and infrastructure developments.

17. A presumption in favour of sustainable development is one of the most effective ways to stimulate sustainable economic growth. This does not mean building anywhere at any price – but it does send a strong signal to investment decision-makers about the intentions of the planning system to facilitate economic development. It also highlights the importance Scotland places on sustainable development and the achievement of reaching net zero carbon.

18. Our members have strong concerns that it is unclear how Regional Spatial Strategies will feed into NPF4, despite featuring heavily in the debate during the passage of the 2019 Planning Act. Our members are firmly of the view that they are still very vague in nature and have expressed concern that participation by local authorities is voluntary.

19. It is also important that there is a remedy where development plans are under performing and/or out of date. It is important to have a policy basis for Scottish Ministers to require Councils to address under delivery or an out-of-date local plan. This would support the proposed NPF4 policy change in relation to the need for a longer-term housing perspective which states that ‘future plans can promote immediate deliverability and viability’.

20. A consistent basis for calculating housing need followed by allocation of sufficient land supply is key to effective housing delivery, and economic value is important for location of new homes. The provision of sufficient land to support a viable development process that will match demand for homes and business premises is critical. Land prices will be reduced due to increased land supply, and housing land needs to be identified where people want to live, to ensure that homes can be delivered.

21. An increase in the cost of land effectively puts the brakes on the provision of affordable homes and infrastructure becomes difficult to deliver. It is also important to note that housebuilding can be stalled or delayed when land is allocated, but the infrastructure demands to release it cannot be supported by the land value. There are major items like roads and schools which need to be funded more widely and cannot be directly funded from land value uplift. The planning system needs to acknowledge this as part of an overall picture of encouraging the right development in the right places.

22. Our members are confused by the intention to identify the ‘land required’ for housing in each local authority area, considering this to be beyond the remit of NPF4. It was the clear intention that the NPF should be the place where the housing numbers required to meet need and demand are identified, by local authority area. The amount of land required to fulfil this need and demand will then be determined by a range of other local development plan policies, such as housing types and densities, and these will vary spatially as appropriate. The NPF should not have a role in the identification of the amount of land required for housing.

23. The planning system should not seek to micromanage housing land release but should retain some measure of appropriate housing land supply that allows for effective forward planning and monitoring.

Monitoring

24. There needs to be a holistic assessment of infrastructure investment and how it will influence the successful attainment of building sustainable places, transform to net-zero carbon emissions and support an inclusive economy. The indicators need to be varied - housing needs and demand, including longer term healthcare provision; data needs and demand; changes in air travel and tourism, educational and utility requirements. Average distances travelled for shops, work and active travel would also be a metric that will inform this and future infrastructure investment plans. The success or otherwise of recurring investment in places and infrastructure should also be an indicator. These indicators should be employed to assess the implementation of NPF4.

25. Our members are also of the view that a new perspective should be considered for estimating the overall impact of new infrastructure investment. For example, a new local school or hospital may 'cost' in terms of emissions caused by new construction activities (and financial investment). But this new local infrastructure will also save emissions in the long term through avoiding people being forced to travel long distances by car to send children to school or for hospital visits. As well as quality of life, there is the possibility of significant greenhouse gas savings through these forms of localism, but there may need to be an initial investment in new social infrastructure to make localism a reality.

26. The proposed Scottish National Infrastructure Company or the Scottish Futures Trust could be ideally placed to look at infrastructure from a lifecycle perspective and not just a one-off investment to address a problem. It is important to consider the following –

- prioritising the right infrastructure to help development come forward
- planning and structuring
- construction and renewal
- maintaining and operating it
- decommissioning (where appropriate) and
- completing an evaluation.

55 Do you have any other comments on the delivery of the spatial strategy?

Do you have any other comments on the delivery of the spatial strategy?:

1. In its current form there is a risk that NPF4 could limit development rather than enable it. There remains a risk of tension between policy principles that gain support at national level but may be challenging to implement due to local circumstances, empowering community planning, and local policy responses.

2. The SPF's main interest in NPF4 is to see a framework focused on delivering and building sustainable and inclusive growth, to unlock development and deliver the much-needed infrastructure for our growing population and business needs. Our members would like to see NPF4 deliver a framework for investment by the private sector, the public sector, and other ventures. With a collaborative approach, we can start to solve the critical challenge placed on our communities by the Covid-19 pandemic.

3. There is a great deal attention to preventing harm and other technical requirements however, there very little to encourage development and investment. While we see all the priorities and outcomes in the National Performance Framework as important, we would suggest that NPF4 must pay significant attention to driving the delivery of the economic priorities, because without a successful economy, Scotland will find it is increasingly difficult to deliver the wider vision for inclusivity and well-being.

4. Some of our members have suggested that the preparation of the NPF4 should be paused to allow for a Delivery Programme to be drafted and consulted on alongside the Framework. We understand that a delivery programme is currently being considered but there is also concern among members that there is a gap in local plans between now and when the SPP comes into force, which could have a negative impact on delivery and consistency of decision making. Given the effect of the COVID pandemic, some flexibility will also be required around change of use and assistance in reaching decisions based on priorities in the interim.

5. The desired outcomes of NPF4 will be reliant on significant upskilling and resourcing of LA planning departments, with no clear plan of action or funding programme to tackle this problem. The document fails to address the ongoing challenge of the resourcing of planning departments, the inconsistency in decision-making and planning application decision times, that still fall far below SG targets and statutory timeframes. All of this sits against the backdrop of a fee regime that is set to be increased, again, on 1st April 2022 with no clear strategy on improvement of planning performance.

Questions - Part 5 - Annexes

56 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?

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? :

1. While we see all the priorities and outcomes in the National Performance Framework as important, we would suggest that NPF4 must pay significant attention to driving the delivery of the economic priorities, because without a successful economy Scotland will find it is increasingly difficult to deliver the wider vision for inclusivity and well-being.

2. The challenge of delivery is not just about the establishment of appropriate plans and policies. Heads of Planning Scotland are currently estimating a

requirement for some 700 new Scottish planners to transform the planning system over the next 15 years. To recruit this number of planners is a huge challenge, and it is a potential obstacle to the successful delivery of NPF4 and wider authority planning responsibilities.

3. Our members are of the overall view that while NPF4 contains some good policy narratives, although they can at times be conflicting, it is light on actual delivery detail. If we are truly committed to the six statutory outcomes set out in the Planning (Scotland) Act 2019, it is vital that consideration is given to the practical delivery of the aspirations of the NPF. There are many further policies and initiatives to be initiated following the adoption of NPF4, for example there will be a new Infrastructure Investment Plan to be established. In summary our members are concerned that there is a delivery gap between the aspirations of the NPF4 and the realisation of its objectives.

4. For example, there needs to be a holistic assessment of infrastructure investment and how it will influence the successful attainment of building sustainable places, transform to net-zero carbon emissions and support an inclusive economy. The indicators need to be varied - housing needs and demand, including longer term healthcare provision; data needs and demand; changes in air travel and tourism, educational and utility requirements. Average distances travelled for shops, work and active travel would also be a metric that will inform this and future infrastructure investment plans. The success or otherwise of recurring investment in places and infrastructure should also be an indicator. These indicators should be employed to assess the implementation of NPF4.

5. Our members are also of the view that a new perspective should be considered for estimating the overall impact of new infrastructure investment. For example, a new local school or hospital may 'cost' in terms of emissions caused by new construction activities (and financial investment). But this new local infrastructure will also save emissions in the long term through avoiding people being forced to travel long distances by car to send children to school or for hospital visits. As well as quality of life, there is the possibility of significant greenhouse gas savings through these forms of localism, but there may need to be an initial investment in new social infrastructure to make localism a reality.

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

Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?:

1. Scotland is still in the grip of a housing crisis, and therefore more housing requires to be delivered across all tenures. The extenuating circumstances of the COVID-19 pandemic has had a continuing negative impact on the whole housing delivery cycle. If we are truly committed to the six statutory outcomes set out in the Planning (Scotland) Act 2019, it is vital that consideration is given to an upwards adjustment of housing need and demand, and corresponding minimum Housing Land Requirements, in whatever overall figure is provided in NPF4.

2. The level of future housing sought appears to be very low and may have a major impact upon the housebuilding industry in Scotland. Low levels of future homes means that existing stock becomes more expensive as competition increases and affordability becomes even more pronounced. The proposals appear to lack any ambition to address important matters of housing the Scottish population, irrespective of the tenure required.

3. Our members support the intent that the level of housing land once written into NPF4 can be exceeded in the LDPs. It is important that there is as much evidence on housing need and demand included to inform this as well as the growth potential of settlements. These must be targets for homes to be delivered, not simply the amount of land allocated for housing.

4. Our members support a minimum flexibility allowance for urban and rural areas. However, if rural areas are to be repopulated, they are of the view that these minimum figures may need to be increased. The challenges of assessing housing needs are generally more understood in the major population centres but can be more complex in remote/rural areas, where loss of population and issues with second homes can have significant impact on housing supply and demand. Our members are of the view that there needs to be a balance between supporting the sustainable growth of rural communities along with the provision of suitable local amenities to make them self-sustaining.

5. There is an absence of economic or financial factors that can be major drivers in housing need and demand, which is also linked to tenure. Housing delivery, of all tenures is dependent on a range of public/private funding models. Recognition of the economic drivers that generate the need for housing must be considered.

6. To centralise the housing forecasting system, it is important that there is a clearer articulation between housing investment and inclusive growth. It is critical that the economic benefits from increased home building, such as productivity gains and employment opportunities, are considered. New housing will also support the ambitious transition towards a net zero carbon economy through greatly increased efficiency and zero carbon heating and cooling.

7. Overall, the proposals for the initial default estimates appear to lack any ambition to address the six statutory outcomes set out in the Planning (Scotland) Act 2019, irrespective of the tenure required.

58 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?

Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?:

It is not clear how the proposals for community wealth building will be interpreted by investors and even individual Local Development Plans proposals, or how this would be applied in decision-making terms by different local authorities. It would be helpful if a clear definition of what is meant by community wealth building was included in the glossary.

Questions - Integrated Impact Assessments

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

What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? :

No comment

60 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.

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

61 Environmental Report. What are your views on the potential health effects of the proposed national developments as set out in the 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

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

What are your views on the assessment of alternatives as set out in the environmental report?:

No comment

63 Environmental Report. What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the 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

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

What are your views on the evidence and information to inform the society and equalities impact assessment?:

No comment

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

Do you have any comments on the findings of the equalities impact assessment?:

No comment

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

Do you have any comments on the findings of the children's rights and wellbeing impact assessment?:

No comment

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

Do you have any comments on the fairer Scotland duty and the draft NPF4?:

No comment

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

Do you have any comments on the consideration of human rights and the draft NPF4?:

No comment

Do you have any comments on the consideration of human rights and the draft NPF4?:

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

Do you have any comments on the islands impact assessment?:

No comment

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

Do you have any comments on the partial business and regulatory impact assessment? :

1. In Scotland, commercial real estate is one of the fundamental building blocks of our economy and encompasses a vast range of essential economic and social infrastructure. Our industry provides the professionally managed rented homes in which many people live; the commercial space in which virtually all types of businesses operate; and the shopping centres, restaurants, cinemas and more in which people spend their leisure time. It is also a key driver of growth and productivity, attracting long term, domestic and overseas capital into the renewal of our towns and cities.

2. Our members question whether NPF4 creates certainty. In its current form there is a risk that NPF4 could limit development rather than enable it. There remains a risk of tension between policy principles that gain support at national level but may be challenging to implement due to local circumstances, empowering community planning, and local policy responses.

About you

What is your name?

Name:
Mandy Catterall

What is your email address?

Email:
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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Scottish Property Federation

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

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly dissatisfied

Please enter comments here.:

We have concerns that the consultation is restricted to the specific questions asked and there is no opportunity to give a general overview or to add any additional comments.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly dissatisfied

Please enter comments here.:

Please see the above comments.