

# Edinburgh and South East Scotland City Region Deal Elected Member Oversight Committee

10am, Friday 11 March 2022

## Consultation on Draft National Planning Framework 4: Proposed Response

### Executive Summary

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The Planning (Scotland) Act 2019 makes significant changes to the way the planning system in Scotland operates. One of the changes is the preparation of National Planning Framework 4 (NPF4) which, when approved, will replace strategic development plans as an element of the development plan for all parts of Scotland. As well as replacing strategic development plan NPF4 replaces Scottish Planning Policy and in doing so introduces a proposed suite of 33 new and revised national planning policies.

The Ministerial foreword to the draft NPF4 sets out how the Scottish Government's approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045. It sets out that the challenges we are facing today demand a change in the way we plan our places for tomorrow and explains how partners can work together to build sustainable, liveable, productive and distinctive places for the future.

Stakeholders are invited to comment on the framework and policies through 58 questions which are set out in the consultation. The proposed response to that consultation is set out in Appendix 2 to this report.

The removal of strategic development plan and their replacement with national policy and a suite of policies which are mainly directed at local implementation through local development plans creates something of a policy void at a city region level. This 'void' can usefully be filled by non-statutory policy frameworks such as the Regional Prosperity Framework. However, it is necessary to ensure that national policy as set out in NPF4 facilitates delivery of the Shared Prosperity Framework and comments in that regard are the focus of the proposed response.

The deadline for response is 31 March 2022 and the Scottish Government expects the NPF4 to be finalised and adopted by the end of 2022.

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## Consultation on Draft National Planning Framework 4: Proposed Response

### 1. Recommendations

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- 1.1 To note the publication for consultation by the Scottish Government of a proposed National Planning Framework 4;
- 1.2 To note that when approved NPF4 will replace the SESplan Strategic Development Plan, National Planning Framework 3 and Scottish Planning Policy;
- 1.3 To note that comments on the proposed NPF4 are invited;
- 1.4 To consider and comment on the proposed response to the consultation, attached as Appendix 2 to this report;
- 1.5 To note that the proposed response remains subject to on-going consultation with City Region Deal partners;
- 1.6 To note that the draft response was reported to the Edinburgh and South East Scotland City Region Deal Joint Committee on 4 March and that joint committee delegated approval of the final response to the Elected Member Oversight Committee noting that committee may wish to further delegate completion and submission of the response to an officer in one of the constituent councils; and
- 1.7 To agree that the Head of Planning, Economic Development & Regeneration at West Lothian Council be delegated to finalise the response and submit it to the Scottish Government by the deadline subject to any substantive changes to the version before committee being advised to committee members prior to submission.

### 2. Background

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- 2.1 The Scottish Government is in the process of replacing the National Planning Framework for Scotland (NPF3) which was published in 2014.
- 2.2 Draft NPF4 differs substantively from previous iterations of the National planning Framework which were largely focused on facilitating development and economic growth. The Ministerial foreword to NPF4 signals that it has a different emphasis and that it will set out how the Scottish Government's approach to planning and development will prioritise climate action and help to achieve a net zero, sustainable Scotland by 2045.
- 2.3 NPF4 incorporates a revised suite of national planning policies which, in due course, are intended to replace those set out in Scottish Planning Policy (SPP 2014).

- 2.4 When adopted, it will replace the existing strategic development plan and form part of the development plan. Therefore, it will directly influence planning decisions. Crucially, it will inform the preparation of the next round of Local Development Plans and it is intended that it will be underpinned with a clear delivery programme.
- 2.5 Sustainability and addressing climate change are key themes which run through the entire document and it is clear that the climate emergency has been highly influential in shaping the new framework. The COVID-19 pandemic has also influenced NPF4, exposing as it has a number of social inequalities which exist across Scotland's urban and rural areas.
- 2.6 NPF4 gives the planning system a substantive role in seeking to address these inequalities through a combination of attempting to direct investment towards disadvantaged communities and incentivising the development of brownfield sites in urban areas.
- 2.7 However, the removal of strategic development plan and their replacement with national policy and a suite of policies which are mainly directed at local implementation through local development plans creates something of a policy void at a regional partnership level. While the draft NPF4 details a number of Geographical Action Area these are greater than City Region Deal Areas in scale. This 'void' can usefully be filled by non-statutory policy frameworks such as the Regional Prosperity Framework. However, it is necessary to ensure that national policy as set out in NPF4 facilitates delivery of the prosperity framework and comments in that regard are the focus of the proposed response. Partners, particularly the six local authorities, will no doubt wish to make their own responses on the more detailed policy provisions.

### **3. Main report**

- 3.1 City Region Deal partners agreed a response to a draft position statement on NPF4 issued by the Scottish Government in November 2021. That submission was broadly supportive of the 'direction of travel' of the emerging NPF4. The comments made by the City Region Deal appear to have been broadly taken on board in the draft to NPF4. However, as a note of caution, the framework and policies remain at a reasonably high level and the effectiveness in delivering the ambitions will be very dependent on the interpretation of the framework through the planning process. The delivery programme which will follow NPF4 and setting out how the ambitions set out will be achieved will be of critical importance, perhaps more so than NPF4 itself.
- 3.2 Nevertheless, the intentions of NPF4 appear to broadly align with the aspirations of the City Region Deal partnership as set out in the original deal agreement and the Regional Prosperity Framework which sets a social, economic and environmental vision for the city region over the next 25 years.
- 3.3 The Planning (Scotland) Act, 2019 also sets out a requirement for NPF4 to contribute to six overarching outcomes set out in the Act, namely:
- *improving the health and wellbeing;*
  - *increasing the population of rural areas;*
  - *meeting housing needs;*
  - *improving equality and eliminating discrimination;*
  - *meeting targets for emissions of greenhouse gases; and*
  - *securing positive effects for biodiversity.*
- 3.4 To do this NPF4 is split into five sections as follows and an overview of the detail of each part is provided in the following sections:

- Part 1 A National Spatial Strategy for Scotland
- Part 2 National Developments
- Part 3 National Planning Policy
- Part 4 Delivering Our Spatial Strategy
- Part 5 Annexes (including Housing Land requirements)

## A National Spatial Strategy for Scotland

3.5 The National Spatial Strategy is intended to guide decisions on future development across Scotland and aims to produce:

- **Sustainable places**, which reduce emissions and restore biodiversity;
- **Liveable places**, where people can live better, healthier lives;
- **Productive places**, which produce a greener, fairer and more inclusive wellbeing economy; and
- **Distinctive places**, where we recognise and work with local assets.

3.6 The National Spatial Strategy is underpinned by six spatial principles – compact growth, local living, balanced development, conserving and recycling assets, urban and rural synergy and a just transition. It also recognises the different challenges and opportunities across Scotland’s regions, which are outlined in five geographic “action areas”. The action areas, which cover the whole of Scotland with some overlaps between areas, are as follows:

### North and West Coastal Innovation

- Making sustainable use of our coasts and islands to sustain communities and pioneer investment in the blue economy.

### Northern Revitalisation

- Growing low carbon rural communities, capitalising on digital innovation and making the most exceptional natural and cultural heritage.

### North East Transition

- Actively planning a just transition from oil and gas to a net zero future.

### Central Urban Transformation

- Transforming and pioneering a new era of low carbon urban living.

### Southern Sustainability

- Creating connected, liveable places which benefit from further investment and innovation.

The geographical area of the Edinburgh City Regional deal sits partly in the Central Urban Transformation Area and the Southern Sustainability Area.

3.7 For the Central Urban Transformation Area the key actions are identified as:

**Pioneer low-carbon resilient urban living** which includes requirements to develop a network of 20 minute neighbourhoods; supporting a fine grained approach to placemaking; bring services and jobs closer to homes; investment in infrastructure and

services in line with sustainable travel and investment; tackle concentrations of poor health outcomes and improve access to greenspace.

**Reinvent and Future Proof City Centres** includes requirements to support the social and cultural importance of cities; addressing longer term challenges in cities not least those created by Covid; making the most of heritage and cultural accesses and understanding the capacity of the city.

**Accelerate urban greening** includes requirements to expedite the greening of the built environment including former industrial areas; tackle and restore biodiversity loss; woodland expansion across urban areas and promotion of blue and green networks.

**Rediscover urban coasts and waterfronts** includes requirements for unlocking the strategic importance of coasts as resources for people and industry including at Edinburgh Waterfront; address coastal erosion; flood risk and storm surges; access for tourism and habitat protection.

**Reuse Land and Buildings** includes a requirement to do more to reuse empty buildings; providing support for the reuse of brownfield land and de-risking these sites through an infrastructure first approach to reduce pressure on growth where it is no longer sustainable.

**Invest in net zero housing solutions** includes a requirement to diversify residential and car based communities by supporting local businesses, leisure and retail uses; put a regional developer contribution framework in place to unlock cross boundary transport challenges; reduce house based emissions and invest in renewing and improving capacity in flooding, water and drainage infrastructure.

**Growing a Wellbeing Economy** includes a requirement to target future development in areas of significant economic disadvantage; address national, regional and localised inequality; support new models of working; achieving higher density mixed use neighbourhood; support existing town centres and adopt community wealth building approaches.

**Reimagine Development on the Urban Fringe** includes requirements to protect the rich and diverse rural areas around existing settlements and to consider their role in matters such as tourism and sustainable food production.

**Improve Urban Accessibility** includes requirements to focus on community wealth building, putting in place a mass transit system for Edinburgh through plans to extend the tram network and to improve sustainable connectivity to the rest of the UK.

3.8 For the Southern Sustainability Area, the key actions are identified as:

**Create a Low Carbon Network of Towns** includes requirements to consolidate settlements; capitalise on the strong sense of place; promote development close to the Borders rail line; promote a tailored response to the 20-minute neighbourhood concept; build resilience to climate change including flooding.

**Support Sustainable Development** includes requirements to create high quality green jobs; diversify the economy; place an emphasis on community wealth building;

reduce dependency on a relatively low wage economy and build on outdoor recreation opportunities.

**Innovate to Sustain and Enhance Natural Capital** includes requirements to use the area's forests and woodlands to support carbon storage and sequestration and promote opportunities for renewable energy generation.

**Strengthen Resilience and Decarbonise Connectivity** includes requirements to progress the role of Scottish Borders as part of the Edinburgh City Region; improve public transport routes to provide an alternative to car use and secure better digital connectivity.

- 3.9 While the majority of these actions will be for local authorities to pursue there is clearly a regional consideration. On the whole the actions align with the aims set out in the City Region Deal's Regional Prosperity Framework. However, in many cases, the actions will take many years to deliver and will be expensive to achieve. The consultation identifies that a delivery programme will support NPF4 but little detail of this is given at this stage. In the absence of the detail of the delivery programme it is difficult to assess how effective the aims are likely to be. Clarity on how the aims are to be achieved is a key element of the proposed response.
- 3.10 It should be noted that reference is made to a regional developer contribution framework in the Central Urban Transformation Area. However, it is not clear how such a framework could be established given current legislative provisions and, even if it could be delivered, how effective it would be given that the majority of the strategic housing sites across the city region already benefit from planning consent. The response, therefore, calls for this reference to be removed.

## **National Developments**

- 3.11 There are 18 national developments identified in the draft NPF4 which are identified as supporting the delivery of the National Spatial Strategy. They have been assessed and selected against the four key outcomes of climate, people, work and place.
- 3.12 While 10 of the projects which were identified in NPF3 are retained and carried over to NPF4, (including Central Scotland Green Network and a national walking, wheeling and cycling network promoting active travel), 4 have not been taken forward on the basis that the spatial priorities have changed. These includes Freight handling Capacity on the Forth and Strategic Airport Enhancements. At the same time, 8 new national developments have been added which the draft NPF4 suggest best reflect the new national development priorities and in particular will help to mitigate and adapt to climate change. These include Edinburgh Waterfront, Aberdeen, Edinburgh and Glasgow Mass Transit Networks and Industrial Green Transition Zones.
- 3.13 The addition of the Edinburgh Waterfront and the Edinburgh Mass Transit Networks is welcomed in terms of the recognition of their national importance. However, there is no recognition of the importance of an extension to the Borders Rail line and it is recommended that this should be recognised as a National Development. Notwithstanding, it is not entirely clear how the recognition as a national development assists with delivery of these projects. Clarification is sought on this matter through the response to the consultation.

## **National Planning Policy**

- 3.14 35 national planning policies are set out for the development of land which are to be applied in the preparation of LDPs; local place plans; masterplans and briefs; and for determining planning applications.
- 3.15 The policies have been arranged to support the four overarching themes of the strategy (Sustainable Places, Liveable Places, Productive Places and Distinctive Places). While some policies are entirely new and clearly arise from new priorities including the climate emergency, others have had only minor changes made to their previous iteration in SPP 2014 and some have been changed quite considerably or significantly expanded. A list of the policies and a brief summary of their nature and scope is provided as Appendix 1.
- 3.16 There is an intent to minimise development which impacts upon climate and nature and planning applications will have to demonstrate how proposals will help meet the country's targets to cut emissions to net zero by 2045 and facilitate biodiversity enhancement. Policies are unashamedly designed to reduce land take and out of town development, maximise the use of existing brownfield land and disused buildings and to adopt a more plan led approach to housing. Policies to support renewable energy, energy storage, heat networks and the move to a circular economy are also included.
- 3.17 Key objectives are to promote active and sustainable travel and achieve more local and sustainable living with a finer grain mix of uses so that people can more readily access the facilities and services they need on a daily basis. An emphasis is also placed on blue and green infrastructure, play and sport.

## **Delivering Our Spatial Strategy**

- 3.18 This section outlines how this strategy will be delivered. It recognises that it will require collective action from public and private sectors and wider communities and a standalone delivery programme will accompany NPF4 once it has been finalised.
- 3.19 As noted elsewhere in this report, much of the policy context the proposed NPF4 is focused on implementation through individual local development plans. However, the overall strategy will be crucial in ensuring that there is close alignment between national strategy set out in NPF4 and the partnerships Regional Prosperity Framework. Both will have to align with other strategies and plans including, for example, the Strategic Transport Priorities and investment in infrastructure. The section on Delivering the Spatial Strategy makes these connections and recognises that resources will have to be aligned. However, there is little detail about how this will be achieved other than setting out that further work on delivery will be carried out.
- 3.20 It is disappointing that this further work has not been carried out in advance of publication of the draft given that an effective approach to delivering is so central to a successful approach. It is difficult to assess the likely impact of the strategy without having clarity on how the aim can be achieved. Clarification is sought on this matter through the response to the consultation.

## **Annexes**

- 3.21 Annexes provide information on how statutory outcomes are being met, Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland, along with a Glossary of definitions.
- 3.22 Perhaps the most important of these is Annex B which identifies the 'Minimum All-Tenure Housing Land Requirement' (MATHLR) which each planning authority in Scotland must plan to accommodate in the next iteration of their LDP.
- 3.23 It should also be noted that the previously contentious need to maintain a minimum 5-year supply of effective housing land is replaced with a longer-term policy perspective requiring a deliverable supply pipeline of short, medium and long-term housing sites.
- 3.24 On the whole the MATHLR for each of the constituent local authorities are lower than the rates of growth identified in the previous Strategic Development Plan. This may mean that the level of new housing allocations in local development plans is modest. However, these are matters for individual local authorities. One matter to note in the housing requirements is that they are calculated only at a local authority level and there is no recognition of the regional housing market in the land requirements.

### **Consultation Response – The City Regional Deal’s Position**

- 3.25 The 70 questions posed by the consultation, together with the council’s proposed responses, are set out in Appendix 2. On the whole the proposed responses are supportive of the aims and objectives set out in the draft framework which seem to align with the City Region Deal partnership’s aims with respect to achieving future prosperity in a sustainable and carbon neutral way and, at the same time, protecting the region’s most important natural, physical and cultural assets.
- 3.26 With respect to the policy position set out in the proposed NPF4 the proposed response reflects that these are principally matters for planning authorities to progress through local development plans. Nevertheless, the response is generally supportive of the aims and objectives of the policies which, again, mostly align with the City Region Deal’s aspirations. However, there are some contradictions in the policies and some lack clarity on how the policies will be tested and implemented. For example, they regularly use terminology such as “significant” without providing any clarity on how significance will be assessed and measured. While recognising that these are mainly matters for planning authorities to respond on, the proposed response identifies where there are contradictions and identifies how these could be addressed.
- 3.27 Draft NPF4 identifies the importance of a robust spatial strategy. Members will recall that the City Regional Deal partnership [endorsed a draft spatial strategy](#) in at the Elected Member Oversight Committee meeting in November 2021. That strategy was based on the strategy set out in Strategic Development Plan 2. While it is likely that this draft spatial strategy will continue to form the basis of the spatial strategy going forward there is now an opportunity to review the strategy to ensure that it aligns with current thinking on the following matter:
- Ensuring future ‘net zero’ places which will be more resilient to the impacts of climate change and will support the recovery of the natural environment;
  - Ensuring future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live than at present;

- Ensuring future places can attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing;
- Ensuring future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient; and
- Ensuring future places that overall are sustainable, liveable, productive and distinctive.

3.28 The spatial principles set out in draft NPF4 enable the right choices to be made about where development should be located. The 5 spatial strategy action areas cover the whole of Scotland and would appear to identify the key opportunities in these areas. However, it is important to ensure that the actions in these areas are not mutually exclusive. For example, the North East Transition Area has a focus on actively planning a just transition from oil and gas to a net zero future. There are of course a significant level of oil and gas related facilities and businesses in the City Region and it is important that the same principles will apply to these businesses. Similarly, the Northern Revitalisation Area has actions looking at digital innovation, and making the best use of natural and cultural heritage. These are, of course, significant issues for the City Region as well.

3.29 While the selection of at least some of the 18 national developments could be considered subjective they do collectively align with the overarching key priorities of the national spatial strategy. The national developments identified for the City Region are considered to be appropriate subject to the inclusion of the Borders Rail Line extension. However, it remains unclear as to how the identification of national development assists with delivery. The proposed response seeks clarification on this point.

## **Conclusion**

3.30 The proposed NPF4 marks a significant step change to the approach to planning in Scotland. There is a clear focus on supporting growth in the most sustainable way as Scotland moves towards net carbon zero.

3.31 The approach appears to be broadly consistent with the City Region Deal's aims and objectives as set out in the Regional Prosperity Framework. However, there is a lack of detail in some aspects and it will not be possible to say that there is full alignment until these details are known. This is particularly the case with the actions necessary to deliver the strategy where much of the detail remains to be confirmed.

3.32 Consequently, the proposed response to the consultation is broadly supportive of the terms of the proposed NPF while calling out areas where further clarity and engagement is required.

## **4. Financial impact**

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4.1 The consultation itself does not create any financial impacts. However, there will be significant capital and revenue costs associated with delivering sustainable economic growth in the region and these will have to be managed on an on-going basis.

## **5. Alignment with Sustainable, Inclusive Growth Ambitions**

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- 5.1 NPF4 will have a significant role in enabling sustainable and inclusive economic growth in the city region and, as such, it is imperative that there is alignment between National Planning Framework 4 and the Regional Growth Framework.

## **6. Background reading/external references**

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- 6.1 [National Planning Framework 4](#):
- 6.2 [National Planning Framework 4: Position Statement](#)

## **7. Appendices**

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- 7.1 Appendix 1: Summary of proposed policies (as referenced in Appendix 2).
- 7.2 Appendix 2: Proposed response to the NPF4 Consultation.

## APPENDIX 1

### SCOTTISH GOVERNMENT CONSULTATION: SCOTLAND'S FOURTH NATIONAL PLANNING FRAMEWORK (NPF4)

#### SUMMARY OF NPF4 POLICIES

***Policy 1: Plan-led approach to sustainable development***

Requires all local development plans to manage the use and development of land in the long-term public interest.

***Policy 2: Climate emergency***

Requires that "significant weight should be given to the Global Climate Emergency" when considering all development proposals.

***Policy 3: Nature crisis***

Requires development plans to facilitate and contribute to biodiversity enhancement. Proposals for national, major and EIA development should only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, so that they are in a demonstrably better state than without intervention.

***Policy 4: Human rights and equality***

Affirms that Planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality.

***Policy 5: Community wealth building***

Requires development plans to address community wealth building priorities by reflecting a people-centred approach to local economic development. Spatial strategies should support community wealth building, address economic disadvantage and inequality and provide added social value.

***Policy 6: Design, quality and place***

Requires development proposals to 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. Proposals which are poorly designed should not be supported

***Policy 7: Local living***

Requires LDPs to support the principle of 20-minute neighbourhoods and support development proposals that are consistent with it.

***Policy 8: Infrastructure First***

Requires LDPs to be based on an 'infrastructure-first approach' – requiring LDPs to clearly set out infrastructure requirements, the evidence base for those requirements, and indicate required developer contributions. Proposals should mitigate their impacts on infrastructure and should not be supported unless provision is made to do so.

***Policy 9: Quality homes***

Requires LDP's to identify a housing target in the form of a Housing Land Requirement *and aligned to the nationally identified 10 Year Minimum All-Tenure Housing Land Requirement (MATHLR) set out in Annex B.*

Also requires a deliverable 'housing land pipeline' to be established for the Housing Land Requirement setting out short, medium- and long-term sites which can be supported by the infrastructure requirements of the spatial strategy.

Overall, the policy seeks to encourage and support the delivery of high quality, sustainable homes that meet the needs of people throughout their lives.

Requires 'Statements of Community Benefit' to be prepared by developers to accompany larger applications for residential development.

**DATA LABEL: PUBLIC**

Identifies a presumption in favour of proposals for public or private, permanent or temporary, Gypsy/Traveller and Travelling Showpeople sites on land not identified for this use in the development plan unless there are specific reasons not to.

Strongly reinforces the point that “New homes on land not identified for housebuilding in the local development plan should not be supported”.

***Policy 10: Sustainable transport***

Requires LDPs to prioritise locations for future development that can be accessed by sustainable modes. Developments which would increase reliance on the private car should not be supported.

***Policy 11: Heat and cooling***

Requires LDP's to take account of the area's Local Heat & Energy Efficiency Strategy (LHEES) and areas of heat network potential and any designated heat network zones (HNZ) when allocating land.

***Policy 12: Blue and green infrastructure, play and sport***

Requires LDP's to identify and protect blue and green infrastructure, including new or improved access to children's play and outdoor sports opportunities. Proposals which result in fragmentation or net loss of existing blue and green infrastructure and the loss of children's play provision should not be supported.

***Policy 13: Flooding***

Requires LDP's to strengthen community resilience to the current and future impacts of climate change, including identifying opportunities to implement natural flood risk management and blue green infrastructure.

Plans are further required to take account of the probability of flooding from all sources and new development proposals in flood risk areas, or which can impact on flood risk areas, should be avoided. Advises that a cautious approach should be taken.

***Policy 14: Health and wellbeing***

Requires LDPs to aim to create vibrant, healthier and safe places and should seek to tackle health inequalities particularly in places which are experiencing the most disadvantage and indicates that the provision of health and social care facilities and infrastructure to meet the needs of the community should be a key consideration.

***Policy 15: Safety***

Requires development proposals in the vicinity of major accident hazard sites to take account of the potential impacts of the proposal on the major-accident hazard site and also on surrounding populations and the environment. Advises that decisions should be informed by, amongst other things, the Health and Safety Executive's planning applications advice.

***Policy 16: Business and Employment***

Requires LDP's to set out proposals to meet requirements for employment land, infrastructure and investment in a way which supports a greener, fairer and more inclusive wellbeing economy.

Proposals for home-working, live-work units and micro-businesses should be supported where compatible with the surrounding area and there will be no unacceptable impacts on neighbouring uses.

***Policy 17: Tourism***

Requires LDP's to support the resilience of the tourism sector, including by identifying proposals for tourism development which reflect sector driven tourism strategies and which can contribute to the viability, sustainability and diversity of the local economy.

***Policy 18: Culture and creativity***

Requires LDP's to recognise and support opportunities for jobs and investment in the creative sector, culture, heritage and the arts.

Indicates that development proposals should seek to make provision for public art where they involve a significant change to, or the creation of new, public open spaces.

***Policy 19: Green Energy***

Includes a general statement that the planning system should support all forms of renewable energy development and energy storage, together with new and replacement transmission and distribution infrastructure. The planning system should also support new and emerging technology, including hydrogen and carbon capture utilisation and storage. It is noted that the onshore wind sector is considered likely to play the greatest role in the coming years.

***Policy 20: Zero Waste***

Requires LDPs to identify appropriate locations for new infrastructure to support the circular economy and meet identified needs in a way that moves waste as high up the waste hierarchy as possible. Development proposals should aim to reduce, reuse, or recycle materials in line with the waste hierarchy

***Policy 21: Aquaculture***

LDP's are required to guide new aquaculture development to locations that reflect industry needs and take account of environmental impact, including cumulative impacts that arise from other existing and planned aquaculture developments in the area, and wider marine planning.

***Policy 22: Minerals***

Requires LDP's to support the 10-year mineral landbank at all times whilst promoting sustainable resource management, safeguarding important workable mineral resources and taking steps to ensure these are not sterilised by other types of development.

Proposals for the exploration and development of fossil fuels and for unconventional oil and gas exploration (fracking) are not supported.

***Policy 23: Digital Infrastructure***

Requires LDP's to support the delivery of digital infrastructure, particularly in areas with gaps in connectivity and barriers to digital access.

***Policy 24: Centres***

Requires LDP's to support sustainable futures for city, town and local centres and identify a network of centres. This should reflect the principles of 20- minute neighbourhoods and the town centre vision, and take account of how they are connected by public transport and walking, wheeling and cycling.

***Policy 25: Retail***

Requires LDP's to support proposals for retail development which will generate significant footfall in town centre sites. However, development in edge-of-town centre or commercial centres should not be supported unless they are explicitly supported by the development plan. Out-of-town locations should no longer be supported.

***Policy 26: Town centre first assessment***

Retains the long established 'town centre first' approach to development that will generate significant footfall (or in the case of drive-throughs, a significant number of visitors) including commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, education and healthcare facilities and public spaces where people can gather.

***Policy 27: Town Centre Living***

Encourages and supports town centre living and requires planning authorities to seek to provide a proportion of their housing land requirements in city and town centres and be proactive in identifying opportunities.

***Policy 28: Historic Assets and Places***

Requires LDP's to identify, protect and enhance locally, regionally, nationally and internationally valued historic assets and places.

***Policy 29: Urban edges***

Recommends that LDP's should consider designating green belts where appropriate in some of the most accessible or pressured rural or peri-urban areas, where there is significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside.

***Policy 30: Vacant and Derelict Land***

Requires LDP's to seek to reuse vacant and derelict land and redundant buildings as a priority including in proposals to creatively and sustainably repurpose buildings and structures.

Proposals on greenfield sites should not be supported unless the site has been allocated for development or the proposal is explicitly supported by policies in the development plan, and there are no suitable brownfield alternatives.

***Policy 31: Rural places***

Requires LDP's to set out proposals to support the sustainability and prosperity of rural communities and economies. Plans should identify accessible, intermediate and remote areas.

However development proposals in accessible or pressured rural areas should only be supported where they are consistent with the spatial strategy set out in the local development plan and do not lead to the unsustainable growth in long-distance car based commuting or suburbanisation of the countryside.

***Policy 32: Natural Places***

Requires LDP's to identify and protect locally, regionally, nationally and internationally valued natural assets, landscapes, species and habitats.

Development proposals that would have an unacceptable impact on the natural environment including biodiversity objectives should not be supported.

***Policy 33: Soils***

Requires LDP's to protect locally, regionally, nationally and internationally valued soils. Development on peatland, carbon rich soils and priority peatland habitat should not be supported unless essential.

***Policy 34: Trees, Woodland and Forestry***

Requires LDP's to identify and protect existing woodland and potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support nature networks.

The spatial strategy should identify and set out proposals for the development of forestry and woodlands in their area, including their development, protection and enhancement, resilience to climate change and the expansion of woodlands of a range of types.

***Policy 35: Coasts***

The LDP spatial strategy should consider how to adapt coastlines to the impacts of climate change. Plans should recognise that rising sea levels and more extreme weather events resulting from climate change will potentially have a significant impact on coastal and islands areas, and that a precautionary approach to flood risk including by inundation should be taken.

## **APPENDIX 2**

### **SCOTTISH GOVERNMENT CONSULTATION: SCOTLAND'S FOURTH NATIONAL PLANNING FRAMEWORK (NPF4)**

#### **DRAFT CONSULTATION RESPONSES**

**Q1.**

**Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?**

The City Region Deal Partnership agrees that the approach has the potential to deliver net zero places. However, the framework itself will not deliver all of the interventions necessary to achieve this. It will require to be supported by a number of other actions to ensure that the objective is achieved.

The strategy has the potential to address and reverse the loss of biodiversity which has already occurred and to bring about other environmental and social improvements while also supporting sustainable growth. Achieving this does, however, require that the policies which aim to achieve this are applied on a consistent basis and that the policies and impact are not undermined through successful challenges, for example through planning appeals.

In the partnerships view a national energy plan is needed as there does not currently appear to be any clear alignment of policy on climate change, local heat and energy and wind. While all these interventions and policies are supported by the partnership it is not clear what the country's capacity to deliver is; what further investment is required and how this will be funded.

NPF4 needs to provide the strongest message possible that it is most definitely not 'business as usual' and that new development can and will only be acceptable where it can be demonstrated as necessary and adheres to the principle of doing no unavoidable harm.

Question 2 deals with future places but there is no clarity in the framework as to how the objectives in Q1 can be achieved for existing places. Making existing and future places net zero places will be necessary if the overall objective is to be achieved.

**Q2.**

**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?**

The City Region Deal Partnership supports the outcomes which the strategy seeks to achieve and believes that the creation of more self-sufficient communities (characterised as 20-minute neighbourhoods in NPF4) is beneficial and desirable.

The City Region Deal Partnership also welcomes empowering people to shape places and is pleased to see that the link between health and housing has been made in the description of liveable places.

Nevertheless, it is recognised that these outcomes are aspirational and achieving them will be challenging. NPF4 on its own will not bring about the fundamental changes which require to be made. Achieving the outcome is likely to be more expensive than current approaches and it is not clear how the additional costs will be met. Clarity on delivery mechanisms is required either as part of NPF4, or in a delivery programme which is agreed in advance of NPF4 being finalised. The partnership is disappointed that the delivery framework has not been developed in parallel with the draft NPF4.

	<p>Fundamentally, clarity on the delivery of essential infrastructure is required. The infrastructure first approach is supported but it is not clear how this will be secured and operated in practice.</p> <p>The City Region Deal Partnership supports the intent of NPF4 to bring all matters together under the four recurring themes of <i>sustainable places</i>, <i>liveable places</i>, <i>productive places</i> and <i>distinctive places</i>. Robust local development plans will be necessary to deliver this. This will require clear, measurable, implementable policies in NPF4. However, the imprecise and often contradictory nature of the policies is likely to result in extended debates on planning proposals at the expense of quick and consistent decisions. There is an opportunity to avert, or perhaps more realistically, minimise future challenges at appeals by providing greater clarity on a number of the policies.</p>
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**Q3.**

**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?**

	<p>The City Region Deal Partnership agrees that the approach provides a sound basis for achieving this outcome. However, it does require investors and others to be receptive to wider environmental considerations.</p> <p>It will also be vital to ensure linkages and alignment across other strategies and frameworks including those on economic growth, climate change and transport. The NPF would be strengthened by identifying what the parallel strategies and frameworks are and how alignment will be achieved.</p> <p>The partnership notes the support for key sectors and while noting that these are not defined it does support the approach. However, this should not be at the expense of on-going support for non-key sectors which will continue to provide an important component of the ongoing economic prosperity of the region not least from a community wealth building and 20 minute neighbourhood perspective</p> <p>The City Region Deal Partnership supports the intent to incorporate community wealth building into its strategy for Productive Places but notes that community wealth building priorities will vary from time to time and place to place across the city region.</p>
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**Q4.**

**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?**

	<p>The City Region Deal Partnership supports the aspirational outcomes which NPF4 has identified to create distinctive places by focusing on 'place making' and raising design and quality of build standards. It also welcomes the recurring theme which places particular emphasis to making better use of vacant and derelict land in preference to greenfield sites. However, there is some contradiction with content elsewhere which identifies, for example, that some former industrial sites may be beneficial in greening urban areas. The supports should, therefore be caveated as 'where appropriate'</p> <p>It is particularly important that the Scottish Government actively support the delivery of placemaking as this will become increasingly important in selling the uniqueness and diversity of the city region as a place to live, work, enjoy and invest.</p>
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Q5.

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

The City Region Deal Partnership agrees that the approach provides a sound basis for achieving this outcome. But it requires interventions beyond the framework set out in NPF4. The spatial strategy itself will not deliver change. The policies which deliver change need to be clear, deliverable, enforceable and applied consistently if change is to be delivered.

There are many other factors, frameworks and strategies that will have a significant determining effect and these will have to be aligned. It is not clear from the draft NPF4 how this will be achieved. There will have to be clarity and alignment around resources and financial investment across the public and private sectors and a fundamental change in attitudes and expectations. These are matters which are not set out in the draft and require further explanation and clarity if the overall spatial strategy is to be deliverable.

While it is primarily a matter for planning authorities the partnership notes and supports the aspiration for a design led approach to achieving distinctive places. However, achieving this will require robustness in policies which require this and a commitment from all parts of government, including the Planning & Environmental Appeals Division, to ensure that high standards can be achieved through planning processes including development management.

Q6.

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

The City Region Deal Partnership believes that the spatial principles provide a sound basis for ensuring the right development takes place in the right place. However, an overall policy on delivering sustainability is needed rather than a read across of a number of often non-aligned policies.

The six overarching principles of compact growth, local living, balanced development, conserving and recycling assets, urban and rural synergy and a just transition are collectively considered to be a sound basis for determining where development should, and just as importantly, should not be located. Making the best and most productive use of available resources is an objective which the City Region Deal Partnership strongly supports. It is also important to ensure that local facilities are funded adequately and that they meet the needs and reasonable aspirations of communities.

However, the NPF is only one of a number of related strategies and policies which influence land use. It is imperative that NPF4 recognises the link with other strategies – for example planning and delivery for strategic transportation projects – and that there is alignment and a shared purpose across all national and regional strategies, including those influencing resource allocations.

<b>Q7.</b>	
<b>Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?</b>	
	<p>The City Region Deal Partnership has well established regional priorities and a set of actions to achieve these. The spatial strategy action areas set out in NPF4 are broadly consistent with these.</p> <p>As referenced in the Scottish Government's Advisory Group's Report 'Towards a Robust Wellbeing Economy for Scotland' (June 2020), differences between regional geography and sectors need to be "recognised, respected and championed".</p> <p>While there is perhaps a case to be made for a finer grain of segmentation, the City Region Deal Partnership nevertheless welcomes the identification of five 'Action Areas' and is pleased that the diverse and distinctive nature of different parts of Scotland have indeed been recognised.</p> <p>Nevertheless, it is important to recognise that the actions are not unique to each action area. For example, the North East Transition Area has a focus on actively planning a just transition from oil and gas to a net zero future. There are of course a significant level of oil and gas related facilities and businesses in the City Region and it is important that the same principles will apply to these businesses. Similarly, the Northern Revitalisation Area has actions looking at digital innovation, and making the best use of natural and cultural heritage. These are, of course, significant issues for the City Region as well.</p>

<b>Q8.</b>	
<b>Do you agree with this summary of challenges and opportunities for this action area?</b>	
	<p>This question relates to North West Coastal Action Area – no response is submitted. However, as per comments elsewhere the specific challenges and opportunities identified should not be considered unique to this action area.</p>

<b>Q9.</b>	
<b>What are your views on these strategic actions for this action area?</b>	
	<p>This question relates to North West Coastal Action Area – no response is submitted. However, as per comments elsewhere the specific challenges and opportunities identified should not be considered unique to this action area.</p>

<b>Q10.</b>	
<b>Do you agree with this summary of challenges and opportunities for this action area?</b>	
	<p>This question relates to Northern Revitalisation Action Area – no response is submitted. However, as per comments elsewhere the specific challenges and opportunities identified should not be considered unique to this action area.</p>

**Q11.**

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

This question relates to Northern Revitalisation Action Area – no response is submitted. However, as per comments elsewhere the specific challenges and opportunities identified should not be considered unique to this action area.

**Q12.**

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

This question relates to North East Transition Action Area – no response is submitted. However, as per comments elsewhere the specific challenges and opportunities identified should not be considered unique to this action area.

**Q13.**

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

This question relates to North East Transition Action Area – no response is submitted. However, as per comments elsewhere the specific challenges and opportunities identified should not be considered unique to this action area.

**Q14.**

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

The City Region Deal Partnership broadly agrees with the challenges and opportunities set out for the Central Urban Action Area. There are, however, some matters which need clarification.

The partnership supports a move to low carbon, resilient urban living and notes the retrofitting of facilities and services into areas where they are scarce. While the principles set out here are supported it is not clear how this can be achieved. It is also potentially contradictory with other aspects of national policy which aim to support town and city centres.

The partnership also notes a commitment to tackling poor health outcomes in the west central Scotland but questions why such a commitment should not stretch more widely across the central urban area (or indeed the rest of Scotland). Of course, land use policy, is only one element of the solution and, as set out elsewhere it is imperative that planning policy aligns with other policy interventions in a holistic way at a national level, as well as a local level. It is not clear how this will be achieved. The partnership notes the intention to progress further work on delivery. However, it is difficult to provide robust comment on addressing the challenges in the absence of a clear delivery programme.

The aim of de-risking redevelopment sites through an infrastructure first approach is welcomed as is the recognition that some areas where there is development pressure are no longer sustainable. Further clarity is, however, need on how the infrastructure first approach can be achieved. The partnership recognises the commitment to carry out further work on delivery but it is strongly of the view that this work needs to be completed before NPF4 is approved.

	<p>The draft NPF4 sets out a commitment from partners to put in place a regional developer contribution framework. While City Region Deal partners are not against the principle of such an approach they cannot see how an effective and deliverable approach can be achieved given current approaches to developer contributions as set out in Planning Circular 3/2012. Clarity on what is expected and how this can be achieved is required or the reference should be removed.</p>
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**Q15.**

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

	<p>The City Region Deal Partnership broadly agrees with the strategic actions identified for the Central Urban Action Area subject to the matters raised in the respond to Question 14.</p>
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**Q16.**

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

	<p>The City Region Deal Partnership broadly agrees with the challenges and opportunities set out for the Southern Sustainability Action Area. There are, however, some matters which need clarified.</p> <p>It is unclear how fully the interim Regional Spatial Strategy for this area has influenced the preparation of this section and reflected the relationship of this Action Area with the city region. The introductory paragraph states that the area is “linked to” the Edinburgh City Region, which underplays the fact that the Scottish Borders forms an integral part of it. This narrative might be amended to better reflect that important connection.</p> <p>The suggested “branding” for each of the areas has distilled a range of issues into a single, high-level, issue; sustainability in the case of the South of Scotland. This is arguably the least “proactive” of the five areas. The South of Scotland does not merely want to sustain itself. This label is not helpful in the wider analysis, as it implies that other issues and opportunities, such as connectivity, economy and demographic issues are of secondary importance. It may be preferable to simply refer to each area by name and allow the issues to speak for themselves.</p> <p>The narrative makes very little of the strategic importance of the region and, in particular, the links it provides to Northern Ireland to the west and England to the south, neither of which are mentioned at all. Given the influence of both, including in economic terms, locally, regionally and nationally, this seems a significant oversight.</p> <p>Economic ambitions should be given higher priority. Although they are referred to later in the section, the opening introduction should give greater significance to the South of Scotland Regional Economic Strategy, Borderland Inclusive Growth Deal and the Edinburgh and South East Scotland City Region Deal and Regional Prosperity Framework, all of which are significant in catalysing economic growth. Similarly, the role of digital connectivity – and the requirement for growth and investment in it – in supporting economic growth and a means of ensuring parity between urban and rural areas should be given specific mention.</p>
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**Q17.**

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

The City Region Deal Partnership broadly agrees that the actions are a fair summary of the key issues facing the southern region. There are, however, some matters which need clarified.

Greater attention needs to be paid to the work that has gone into preparing the indicative Regional Spatial Strategies for Edinburgh & SE Scotland (as it relates to this Action Area) and for the South of Scotland and that many of the issue, opportunities and actions set out there should be better reflected in the NPF.

Greater reference is required to the potential for the extension of the Borders Railway and the feasibility work that is already committed. This is critically important infrastructure in terms of achieving the aims of the NPF, at a local, regional and national level. There is a persuasive argument that the extension should appear as a national development in its own right. The same is true of the significant investment in the reopening of Reston station and the potentially transformative effects it will have for East Berwickshire. There are also broader concerns that there is limited recognition of the need for improvement of east-west connectivity, both in terms of routes and public transport networks.

There should be greater emphasis on the digital economy and improvements in digital connectivity, which has perhaps the greatest potential as a catalyst to make the region a more competitive place to work and live.

The Southern Action Area has made a considerable contribution to meeting renewable targets and the potential for the region to become a centre of excellence for manufacture, research and development for the industry needs to be better reflected. There is the need to ensure that the economic benefits of such development is realised at the local and community level.

**Q18.**

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

The City Region Deal Partnership is broadly supportive of the national strategy subject to the general points set out in the response to Question 7 and the more detailed points set out in the responses to Questions 14-17.

**Questions – Part 2: National Developments**

<b>Q19.</b>	<b>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?</b>
	<p>While recognising that classes of developer are principally a matter for planning authorities, the City Region Deal Partnership considers that the classes identified are appropriate.</p> <p>However, on the wider issue of national developments (which do not seem to be covered by other questions in the consultation) it is not clear from the consultation what benefits arise by having a project identified as a national development. While it is recognised that further work is to be done on delivery the City Region Deal Partnership would expect that work to identify such benefits and how they can be best achieved.</p>

<b>Q20.</b>	<b>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?</b>
	Yes

<b>Q21.</b>	<b>Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?</b>
	<p>Yes</p> <p>The most significant omission is the lack of any reference to the extension of the Border Railway from Tweedbank to Carlisle. STPR2 published on 20<sup>th</sup> January acknowledges that the extension of Borders Railway through the Borderlands Inclusive Growth Deal includes up to £10m of funding, £5m from the Scottish Government and £5m from the UK Government, to develop a shared understanding of the benefits and challenges of options to extend the Edinburgh – Tweedbank Borders Railway to Carlisle. This will include the undertaking of feasibility work to further develop the business case for the reinstatement of the railway. It is noted that the Scottish Government will continue to work with Borderlands Partners on this commitment. NPF4 should set out clear support for the Borders railway extension and potential new stations. We would like to see specific mention of improvement work for the existing Borders Railway (Phase 1) i.e. more dynamic loops, more carriages and electrification.</p>

### **Questions – Part 3: National Planning Policy**

**Q22.**

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

The City Region Deal Partnership agrees that addressing climate change and nature recovery should be the guiding principle for plans and planning decisions.

However, it is important that it is a guiding principle rather than an absolute direction in all plans and planning decisions. It is the partnership's position that in some very limited circumstances meeting wider community, equality and economic objectives should take equal priority.

The partnership supports the clear focus of NPF4 on tackling issues relating to climate change, achieving net zero emissions and nature recovery. These are some of the most important and pressing matters confronting humanity and it is appropriate and necessary that they should ordinarily be at the forefront in delivering Scotland's national spatial strategy.

**Q23.**

**Policy 1: *Plan led approach to sustainable development***

**Do you agree with this policy approach?**

The City Region Deal Partnership recognises that Policy 1 relates to the preparation of local development plans which are matters for planning authorities.

Nevertheless, the partnership supports the overall objectives of the policy.

**Q24.**

**Policy 2: *Climate emergency***

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

The City Region Deal Partnership recognises that Policy 2 relates to the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with addressing the climate emergency.

It is the partnership's view that policy itself will not achieve this aim and will require other interventions. Nevertheless, the partnership supports the overall objectives of the policy.

The City Region Deal Partnership recognises that climate change is one of the greatest challenges of our time and recognises that the partnership will have a role in the promotion of development. It accepts that it should do so in accordance with the policy principles set out in Policy 2.

That said it notes the use of indeterminate terminology such as "significant emissions" with no guidance given as to what would constitute a significant emission. NPF4 creates an opportunity to bring a consistent definition to matters such as this. If it does not do so there will continue to be a lack of consistency in assessing the impact of proposals.

	<p>The partnership also notes that there is no reference to offsetting as a form of mitigation. While the partnership believes that developments should strive to be carbon zero it does recognise that this may not be possible in all cases. Where that is not possible offsetting should be required in order to ensure a minimum of net carbon zero is achieved in all cases.</p>
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**Q25.**

**Policy 3: Nature crisis**

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

	<p>The City Region Deal Partnership recognises that Policy 3 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with ensuring that the planning system takes account of the need to address the nature crisis.</p> <p>However, the policy will not be able to achieve all of these aims on its own and will require other interventions to achieve the overall aims. Nevertheless, the partnership supports the overall objectives of the policy.</p> <p>Again, the partnership notes the use of indeterminate terminology such as “facilitating biodiversity enhancements” with no guidance give as to what would constitute an enhancement. It also notes references to “impacts...on biodiversity...should be minimised” without any specification on what would constitute an acceptable impact. NPF4 creates an opportunity to bring a consistent definition to matters such as this. If it does not do so there will continue to be a lack of consistency in assessing the impact of proposals.</p>
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**Q26.**

**Policy 4: Human rights and equality**

**Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?**

	<p>While the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 already requires public bodies to develop and publish an equality outcomes and mainstreaming report every four years and to report on progress against that report every two years, the City Region Deal Partnership nevertheless welcomes the inclusion of a specific policy to tackle discrimination, advance equality of opportunity and promote good relations. It is anticipated that this will help ensure that processes are fully sensitive to the diverse needs and experiences of everyone who interacts with planning.</p>
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**Q27.**

**Policy 5: Community wealth building**

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

	<p>The City Region Deal Partnership recognises that Policy 5 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities.</p>
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	<p>Nevertheless, the partnership promotes a community wealth building approach and supports the overall objectives of the policy. The policy should, if effectively implemented and subject to the comments below, help to deliver the principles of community wealth building.</p> <p>The partnership does, however, note that the intention is that Policy 5 would only apply to National and Major developments. The City Region Deal Partnership does not agree with this restriction and suggests that the principles should also apply to local, non-householder, applications in order to secure and deliver overall community wealth building outcomes.</p>
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**Q28.**

**Policy 6: *Design, quality and place***

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

	<p>The City Region Deal Partnership recognises that Policy 6 relates primarily to the assessment of development proposals which are matters for planning authorities.</p> <p>Nevertheless, the partnership supports the overall objectives of the policy and welcomes the recognition of the importance of good quality design as a component of place making.</p>
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**Q29.**

**Policy 7: *Local living***

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

	<p>The City Region Deal Partnership recognises that Policy 7 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with ensuring that the planning system provides appropriate support for local living.</p> <p>The partnership supports the principle of local living. It also supports the principle of 20-minute neighbourhoods as a means of achieving this. It notes, however, that despite references to 'retrofitting' elsewhere in the NPF there is no reference in Policy 7 to retrofitting existing neighbourhoods to make them 20-minute compliant. The policy should be amended accordingly and, importantly, guidance on how this can be achieved, including how it would be funded, should be provided.</p> <p>As with many proposed policies, Policy 7 lacks clarity about how it will be implemented Policy 7(b) sets out that development proposals which accord with the principles of 20-minute neighbourhoods should be supported. However, this definitive position disregards other policies which the development may be in conflict with.</p>
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Q30.

**Policy 8: Infrastructure First**

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

The City Region Deal Partnership recognises that Policy 8 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities.

Nevertheless, the partnership strongly supports the principle of the 'infrastructure first' approach and considers it to be vital in achieving the overall aims of sustainable economic growth in the city region. The policy sets out that local development plans should align with the Infrastructure Investment Plan, the National Transport Strategy, the Strategic Transport Project Review and the National Marine Plan. The partnership believes that alignment is absolutely crucial but it should take place firstly at a national level rather than trying to retrofit alignment at a regional level.

It is the partnerships view that the alignment should be set out in the NPF itself rather than expecting local development plans to ensure that alignment. That approach has not been successful in the past and there is no evidence it will be successful in the future in the absence of alignment at a national level.

A key-function of NPF4 is to shape the geographic distribution of development and infrastructure across Scotland and it is vital that the growth it promotes is meaningfully aligned with infrastructure investment. For example, the NPF sets Minimum All Tenure Housing Land Requirements for each local authority area. However, in setting those requirements there is no recognition of the infrastructure which will be necessary to support that level of growth or a commitment to ensure that the necessary infrastructure will be provide to allow development to take place. It is this approach which has proven problematic in the past and despite the terms of draft NPF4 there is no evidence to suggest that a more joined up approach will actually occur in the future.

The City Region Deal Partnership would wish to see a more explicit and robust over-arching element to the policy which makes it absolutely clear that development will not be supported unless (a) funding (including any contributions from developer obligations) for necessary infrastructure is fully committed and that infrastructure is capable of being delivered; or (b) phasing to manage demand on infrastructure has been agreed; or (c) in advance of all necessary infrastructure requirements being fully addressed, sufficient infrastructure is available in the interim to accommodate the development.

The City Region Deal Partnership also has concerns at the continuation of the requirement for planning obligations and other legal agreements to satisfy the relevant 'tests' in Planning Circular 3/2012 in relation to the securing of infrastructure.

Experience has demonstrated that the 'tests', particularly those concerning the relevance of infrastructure to the development to be permitted, can be difficult to satisfy. If it is the Scottish Government's aspiration to put infrastructure considerations at the heart of place making as stated then it is suggested that a review of Circular 3/2012 will be required. The partnership notes an intention to review the approach to developer obligations but considers that this review needs to be carried out in parallel with the preparation of NPF4 rather than after NPF4 has been approved.

Finally, in response to this question the partnership reiterates its concern about delivery of cross boundary developer contribution framework as referenced in the response to Question 14.

**Q31.**

**Policy 9: Quality homes**

**Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?**

The City Region Deal Partnership recognises that Policy 9 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, support the delivery of high quality and sustainable homes.

The City Region Deal Partnership considers that it is imperative that a robust methodology for assessing housing need and providing the land necessary to meet that need, including a range of tenures and house types to provide for choice, is a core requirement of a successful city region. It considers that the proposed approach should achieve this. The partnership welcomes the move away from a 5 year land supply approach to a longer term pipeline approach.

Part (i) of the policy references the preparation of a *delivery programme* to accompany the finalised iteration of NPF4. While it is acknowledged that the delivery programme has been deferred until NPF4 is finalised it does mean that there is currently insufficient detail to enable any meaningful comment to be made at this time. As referenced elsewhere it is the partnership view that the delivery programme should be consulted upon and confirmed prior to approval of NPF4.

Finally, the City Region Deal Partnership welcomes the reinforcement this policy provides to the primacy of the development planning system in explicitly and unequivocally stating that ‘New homes on land not identified for housebuilding in the local development plan should not be supported’.

**Q32.**

**Policy 10: Sustainable transport**

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

The City Region Deal Partnership recognises that Policy 10 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities.

Nevertheless, the City Region Deal Partnership agrees with the intentions of this policy. It supports better integration of transport and land use planning. The City Region Deal Partnership notes, however, that NPF4 omits to reference Regional Transport Strategies and Local Transport Strategies and their respective roles and would suggest that this should be remedied to ensure integration and alignment of land use and transportation policies at a national, regional and local level.

In reference to the South-East of Scotland it is the case that the SEStran Regional Transport Partnership has draft a new Regional Transport Strategy which is now nearing completion. It will provide a strategic framework for transport management and investment for the partnership area and has been developed upon an evidence base which reflects the latest understanding of problems and issues in the region, responds to climate change and reflects travel behaviour changes arising from the pandemic. It has two overarching themes, Theme 1 - Reducing car-km and car mode share and Theme 2 - Better connecting communities affected by deprivation to a wider range of opportunities. It would, therefore, be remiss not to afford important policies and strategies such as this the recognition they merit.

	<p>The partnership notes that, as with many other proposed policies, Policy 10 uses terms such as “significant travel generating use” and “proposals that have the potential to affect” without providing any guidance as to what the triggers for these measures are. While the partnership recognises that the trigger may vary for different proposals it believes that a measure could be applied which will ensure clarity and consistency for regulators and developers alike.</p> <p>The City Region Deal Partnership welcomes the more explicit requirement for new local development plans to be suitably informed by an appropriate and effective transport appraisal as this will expectantly address one of the key deficiencies identified in relation to the abortive and ultimately unsuccessful SESplan2. It is however questionable whether Transport Scotland’s ageing Development Planning and Management Transport Appraisal Guidance (DPMTAG) should continue to be promoted as a relevant benchmark document in this respect.</p> <p>Transport has justifiably been identified as one of the highest sources of carbon emission, particularly from private cars, and it is therefore important that much greater efforts are directed towards directing new development to locations that reduce the need to travel and which are capable of being better served by sustainable transport options.</p>
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**Q33.**

**Policy 11: Heat and cooling**

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

	<p>The City Region Deal Partnership recognises that Policy 11 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that the policy will help with achieving zero emissions from heating and cooling of buildings.</p> <p>While the City Region Deal Partnership supports the broad principle of heat networks it is at the same time alert to the fact that they are not always practical or indeed desirable to develop in lower density suburban areas and suggests that this should be reflected and explicitly recognised in NPF4. In these circumstances provision should instead be made to promote and adopt alternative technologies and solutions.</p> <p>The partnership notes the requirement that national and major developments which generate waste or surplus heat should be co-located in areas of heat demand. While recognising the benefit of doing so the partnership notes that it may be impractical in some circumstances or add significant cost in others. Given this, it considers that requirements should be specifically referenced against each national development in the relevant section of NPF4</p>
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**Q34.**

**Policy 12: Blue and green infrastructure, play and sport**

**Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?**

	<p>The City Region Deal Partnership recognises that Policy 12 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does however agree that the policy will help to make our places greener, healthier and more resilient to climate change.</p>
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	<p>The City Region Deal Partnership welcomes the identification and enhanced prominence which the policy gives to natural blue and green infrastructure and it endorses the development of more strategically planned green and blue networks across Scotland. Retaining and enhancing biodiversity-rich natural features such as hedgerows, copses, woodlands and natural grasslands and linking them with water assets, including pools, and water courses, in addition to semi-natural spaces such as parks and private gardens, will have a particularly substantive impact, particularly in the context of an urban and semi-urban environment.</p> <p>The partnership notes that the policy uses language including ‘wherever possible’ and ‘wherever this is necessary’ both of which create a lack of clarity and certainty and the wording should be amended accordingly.</p>
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**Q35.**

**Policy 13: Sustainable flood risk and water management**

**Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?**

	<p>The City Region Deal Partnership recognises that Policy 13 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that the policy will help to ensure that places are resilient to future flood risk.</p> <p>The City Region Deal Partnership welcomes that the policy retains a strong direction that a cautious approach should be taken to the calculated probability of flooding and that it recognises that it is not an exact science.</p> <p>It does, however, note a significant change between SPP, which reads as more forcefully opposed to development on the flood plain, and NPF4 with the new position appearing to be that an exception can be made if there is an <i>existing or committed</i> flood protection scheme. The merits of this approach should be further considered given that there can be no guarantee that a committed scheme will progress to implementation.</p>
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**Q36.**

**Policies 14 and 15: Health, wellbeing and Safety**

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

	<p>The City Region Deal Partnership recognises that Policies 14 and 15 set a policy framework for the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that these policies will help to ensure that places support health, wellbeing and safety and support resilience of communities.</p> <p>As with comments elsewhere, this proposed policy references “significant adverse effects” and “unacceptable levels” without defining how these will be measured and quantified and this needs to be addressed to make the policies implementable.</p>
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**Q37.**

**Policy 16: Land and premises for business and employment**

**Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?**

The City Region Deal Partnership recognises that Policy 16 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that the policy will help to ensure that places support new and expanded business and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy.

The aims of this policy are central to the partnerships approach to ensuring prosperity as part of a wellbeing economy across all parts of the city region. While supporting the aim and objectives of the policy the partnership recognising that achieving the desired outcomes requires more than just robust policies in local development plans. It requires alignment of land use, economic, transport and investment strategies at all levels. While supporting the policy the partnership reiterates its concerns about a lack of detail about alignment and investment in NPF4.

**Q38.**

**Policy 17: Sustainable tourism**

**Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net zero and nature commitments?**

The City Region Deal Partnership recognises that Policy 17 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that the 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.

The partnership recognises to economic, cultural and social benefits which arise from sustainable tourism and supporting a recovery in tourism is a key aim for the City Region Deal partnership but it recognises that it should not be at the expensive of wider environmental considerations.

**Q39.**

**Policy 18: Culture and creativity**

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

The City Region Deal Partnership recognises that Policy 18 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity.

The City Region Deal Partnership welcomes the recognition this policy affords to a more diverse and expansive creative and cultural sector and is particularly pleased to see explicit support for requiring the provision for public art allied with new developments.

	<p>It does, nevertheless, remain the case that it is very difficult for the planning system to secure public art given its inherently 'non-essential' nature and at the same time satisfy the relevant 'tests' prescribed in Planning Circular 4/1998: The Use of Conditions in Planning Permissions and Planning Circular 3/2012 (Revised 2020) (Planning Obligations and Good Neighbour Agreements) as explained in responses elsewhere in this consultation.</p>
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**Q40.**

**Policy 19: Green energy**

**Do you agree that this policy will ensure our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045?**

	<p>The City Region Deal Partnership recognises that Policy 19 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, 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.</p> <p>Nevertheless, the City Region Deal Partnership has some concern with the wording of Policy 19 which it regards as overly permissive. It is suggested that support for renewable energy and low carbon fuels requires to be more meaningfully caveated through, for example, reference to the protection of local natural and landscape designations or wider aims and objectives including sustainable tourism and access to the countryside which could be impacted by renewable energy proposals.</p> <p>The City Region Deal Partnership would suggest that there is a requirement for comprehensive guidance to be provided on the interpretation of this important.</p>
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**Q41.**

**Policy 20: Zero waste**

**Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?**

	<p>The City Region Deal Partnership recognises that Policy 20 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, 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.</p> <p>However, it is disappointing that phrases like 'aim to reduce', 'aim to use' and 'minimise emissions as far as possible' have been employed. This suggest that the policy is not as ambitious as it should and needs to be and the concern is that it may not provide the degree of direction and certainty which decision makers will require. A re-wording is therefore required if the aims are to be achieved.</p>
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**Q42.**

**Policy 21: Aquaculture**

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

The City Region Deal Partnership recognises that Policy 21 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment.

While aquaculture is not a form of development which is significant city region it could be in the future, although it is noted that salmon and trout fish farms will not be supported on the east coast of Scotland. If development is to be supported in the future it will be necessary to achieve the balance between environmental protection and the needs of the industry. It is not entirely clear how this balance will be assessed and ultimately achieved.

**Q43.**

**Policy 22: Minerals**

**Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?**

The City Region Deal Partnership recognises that Policy 22 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, agree that this policy should, if effectively implemented and subject to the comments below, support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment.

The City Region Deal Partnership recognises that minerals are an important feature of the national economy and the region, through its geological characteristics, is an area that possesses a wide range of minerals, including secondary aggregates. Given this it is necessary to be open to the prospect of there being minerals operations within the city region.

However, the policy should reflect both the contribution that minerals can make to the economy, but also to the environmental and social implications which can arise. The policy appears to strike the correct balance but effective implementation will be necessary to ensure that the economic benefits are obtained in balance with appropriate protection for the environment and communities.

It is also suggested that a more prescriptive approach is taken to the extremely important issues of monitoring, restoration and aftercare. Language is important and phrases like 'a high standard of aftercare' are imprecise and unenforceable.

**Q44.**

**Policy 23: Digital infrastructure**

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

The City Region Deal Partnership recognises that Policy 23 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy will, if effectively implemented and subject to the comments below, assist with all of our places becoming digitally connected but will not, in itself, achieve that overall aim.

	<p>The policy in itself will not ensure that all places will be digitally connected as it deals only with development proposals. That ignores the need to invest to ensure digital connectivity and it is not clear from NPF4 how such connectivity will be funded. A development lead approach, including where appropriate developer contributions / obligations, will assist but will not, in itself achieve the overall aim.</p> <p>The City Region Deal partnership recognises the importance of digital connectivity both in terms of connecting citizens but also in a data driven innovation context which has wider economic benefits for the region. Policy 23(c) could be read as supporting data driven innovation but the policy would be strengthened by making this explicit.</p>
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**Q45.**

**Policies 24 to 27: Distinctive places**

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

	<p>The City Region Deal Partnership recognises that Policies 24 to 27 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with ensure Scotland’s places will support low carbon urban living.</p> <p>The City Region Deal Partnership welcomes the retention and re-enforcement of the long established ‘town centre first’ principle. It is an enduring concept and one which is entirely consistent with the principles of sustainability. However, in doing so it recognises some contradictions in the policy provision. including support for cities and neighbourhood centres. Provision of facilities at a city, town and neighbourhood level could act against one another. The policy requires to be clearer on what level of provision is appropriate in each part of the retailing hierarchy.</p> <p>It also welcomes the renewed focus on and explicit support for town centre living and housing, particularly in a post-pandemic period. Low carbon urban living is also considered to be a positive intervention to help address issues of vacant, underused and derelict land and the repurposing of buildings, particularly the re-use of town centre upper/vacant/under-utilised properties, and a timeous opportunity to address and rebalance the physical consequences of a dynamic and rapidly changing retail sector.</p> <p>The City Region Deal Partnership does not see how parts (c) and (d) can be implemented without, for example, identifying ‘disadvantaged’ areas in local development plans and that would likely be contentious.</p> <p>The partnership also supports the principle of providing for housing development in city and town centres but is concerned about a specific duty to make a proportion of the land supply in this way. It may simply not be possible to do so in some town centres. Similar, as with comments elsewhere the use of terminology such as “should seek to provide a proportion’ is vague, unclear and will simply lead to conflict in terms of compliance and implantation of that part of the policy.</p>
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**Q46.**

**Policy 28: *Historic assets and places***

**Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings?**

The City Region Deal Partnership recognises that Policy 28 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with the protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings.

The historic assets and places across many parts of the region form a core component of all that is good about the city region in historical, cultural, tourism and economic terms and should be afforded the greatest level of protection. The partnership acknowledges that the policy sets a framework for achieving this. However again it notes the use of terms such as ‘significant impact’ without these terms been defined or quantified. This needs to be addressed if the policy is to be robust, effective and implementable

**Q47.**

**Policy 29: *Urban edges and the green belt***

**Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?**

The City Region Deal Partnership recognises that Policy 29 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with increasing the density of our settlements, restoring nature and promoting local living by limiting urban expansion and using the land around our towns and cities wisely. However, the policy will not be able to achieve all of these aims on its own and will require other interventions to achieve the overall aims.

The City Region Deal Partnership supports the principle of green belt designations to help regulate development outside urban centres but questions the need to have a greenbelt designation as the only means of preventing inappropriate urban spread. Such an approach would require greenbelts around every urban and rural settlement which would appear to be contrary to the overarching GreenBelt principles.

For the avoidance of doubt the partnership supports the aims but considers that it could similarly be achieved by other designations such as countryside belts.

**Q48.**

**Policy 30: *Vacant and derelict land***

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

The City Region Deal Partnership recognises that Policy 30 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, help to proactively enable the reuse of vacant and derelict land and buildings.

	<p>The City Region Deal Partnership is supportive of the principle of the development of brownfield land ahead of greenfield sites. However, it notes the recognition elsewhere in draft NPF4 that some vacant sites, including brownfield sites, have naturally regenerated and full an important role in greening the urban area and providing wildlife corridors. As a consequence, the partnership argues that the requirement to reuse brownfield land as a priority must be caveated against other policy provisions proposed in NPF4.</p> <p>IT is often argued that reusing brownfield land, particularly where the land has to be cleaned up prior to reuse is more expensive that using greenfield sites. There is therefore an opportunity for Scottish Government to make this a more attractive proposition by putting in place an element of finance, particularly in situations where it can be demonstrated that this would give rise to multiple environmental and social benefits.</p> <p>The policy should make a distinction between urban and rural brownfield sites with a recognition that the expectation is that rural brownfield sites, particularly where they are in unsustainable locations should be restored rather than redeveloped.</p>
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**Q49.**

**Policy 31: Rural places**

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

	<p>The City Region Deal Partnership recognises that Policy 31 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, help to ensure that rural places can be vibrant and sustainable.</p> <p>The partnership is not entirely clear what constitutes a rural place and notes that there is no definition in the glossary. This should be addressed to ensure clarity of purpose with respect to the policy.</p> <p>For the purposes of this response the partnership interprets a rural place as being a community and it supports the concept of supporting such communities to thrive. However, it notes that there is reasonably wide ranging support for development proposals where they reflect development pressures, contribute to sustainability and contribute to viability. While not against the principle of this approach the partnership notes that such approaches may in themselves not be sustainable and being in conflict with the wider objectives of NPF4. It is therefore suggested that the permissive nature of the policy is caveated as being subject to compliance with the wider aims and objectives of NPF4.</p>
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**Q50.**

**Policy 32: Natural places**

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

	<p>The City Region Deal Partnership recognises that Policy 32 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with protecting and restoring natural places. However, the policy will not be able to achieve all of these aims on its own and will require other interventions to achieve the overall aims.</p>
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	<p>The City Region Deal Partnership would have preferred part (g) of this policy to have been framed in such away as it presumed against development proposals that affect a site designated as a Local Nature Conservation site or a Local Landscape Area unless the conditions which it goes on to list could be satisfied. As currently drafted it reads as qualified support which unfortunately serves to diminish the importance of these local designations.</p> <p>The partnership also notes references to “unacceptable impacts” with any clarification of interpretation or quantification as to what constitutes an “unacceptable impact”. If the policy is to be effective and implementable the level of acceptable impact should be defined.</p> <p>Finally, it is not clear how restoration of natural places which are not the subject of development interest will be restored. If restoration is only to be achieved on a development led basis it is clear that restoration of many areas which are in need of being restored will not be addressed. NPF4 should set out a pro-active approach to such restoration including detailing who should be responsible and how it will be funded.</p>
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**Q51.**

**Policy 33: *Peat and carbon rich soils***

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

	<p>The City Region Deal Partnership recognises that Policy 33 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with protecting carbon rich soils and supporting the preservation and restoration of peatlands. However, the policy will not be able to achieve all of these aims on its own and will require other interventions to achieve the overall aims.</p> <p>As with the response to Question 50 the partnership questions how restoration of peatlands which are not the subject of development interest will be restored. If restoration is only to be achieved on a development led basis it is clear that restoration of many areas which are in need of being restored will not be addressed. NPF4 should set out a pro-active approach to such restoration including detailing who should be responsible and how it will be funded</p>
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**Q52.**

**Policy 34: *Trees, woodland and forestry***

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

	<p>The City Region Deal Partnership recognises that Policy 34 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented and subject to the comments below, assist with expanding woodland cover and protecting existing woodland.</p> <p>The partnership agrees that expanding woodland cover and protecting existing woodland are important for all the reasons stated in the policy and particularly as part of the approach to combat climate change and the decline of ecosystems and a proactive approach to protecting and expanding woodland is essential. However, as with the response to Questions 50 and 51 the partnership questions how this policy can or will ensure woodlands are sustainably managed.</p>
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	<p>The City Region Deal Partnership recognises the scope and benefits of local carbon offsetting and supports the management of land assets in a way that contributes to the path to net-zero. It would however wish to see more active encouragement in the policy for parties (public and private) to work collaboratively on progressing woodland creation and management, alongside habitat restoration and utilising external grant funding to allow the continuation of a programme of new woodlands and forests and carbon sequestration.</p>
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**Q53.**

**Policy 35: Coasts**

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

	<p>The City Region Deal Partnership recognises that Policy 35 relates to the preparation of local development plans and the assessment of development proposals which are matters for planning authorities. It does, however, note that this policy should, if effectively implemented, help our coastal areas adapt to climate change and support the sustainable development of coastal communities.</p>
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**Questions – Part 4: Delivering Our Spatial Strategy**

<b>Q54.</b>	<b>Do you agree with our proposed priorities for the delivery of the spatial strategy?</b>
	<p>Deliverability is, in the view of the City Region Deal Partnership at the core of any effective strategy. The partnership supports the principles set out. It also strongly supports the delivery mechanisms which are set out – namely aligning resources; infrastructure first, national developments and regional spatial strategies.</p> <p>However, the partnership is concerned that clarity on delivery against each of these delivery mechanisms has not been progressed in advance of, or in parallel with, the draft NPF. The partnership is concerned, in particular, that Part 4 of NPF4 sets out a commitment only to “explore opportunities to align existing or public sector investment to support delivery of the spatial strategy”. The partnership argues strongly that alignment is fundamental to effective delivery and that it is already too late to “explore” this approach.</p> <p>With respect to Infrastructure First the partnership is similarly concerned with the suggestion that planning has to “regain confidence in the delivery of infrastructure”. It is the partnerships position that planning has never lost that confidence but rather its confidence has been frustrated by a lack of alignment in funding commitments across land use, transportation and economic strategies.</p> <p>Similarly, the partnership notes that further work is to be taken forward to support an infrastructure first approach and that new guidance to support innovation to build a more delivery-focused approach to planning. While the partnership welcomes this commitment, it would have been much more helpful had that further work and guidance been in place prior to the publication of NPF4.</p> <p>Similarly, the partnership welcomes the commitment to review the approach to developer contributions. It is hoped that the review will address a number of the issues which the partnership has raised in its response to draft NPF4. However, again, it is of concern that the review, given its significance to the delivery of the aims and objectives of NPF4, has not been carried out in advance of, or at least in parallel with, progressing NPF4</p> <p>It is clear from Part 4 of NPF4 that much work remains to be done to ensure that NPF4 is aligned to other strategies, and that its policies are effective in achieving the overall aims. The City Region Deal Partnership would welcome the opportunity to engage in this further work.</p>

<b>Q55.</b>	<b>Do you have any other comments on the delivery of the spatial strategy?</b>
	No

**Questions – Part 5: Annexes**

<b>Q56.</b>
<b>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?</b>
Yes

<b>Q57.</b>
<b>Do you agree with the Minimum All-Tenure Housing Land Requirement (MATHLR) numbers identified above?</b>
Yes.

<b>Q58.</b>
<b>Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?</b>
<p>The City Region Deal Partnership considers that adding the following definitions to the glossary would be of assistance</p> <ul style="list-style-type: none"><li>▪ community wealth building</li><li>▪ Scottish Government Investment Hierarchy</li><li>▪ national decarbonisation pathways</li><li>▪ small-scale renewable</li><li>▪ low carbon fuels</li><li>▪ green jobs</li><li>▪ housing land pipeline</li><li>▪ universal digital infrastructure</li><li>▪ future proofed digital infrastructure</li></ul>

## **Questions – Integrate Impact Assessments**

### **Environmental Report**

**Q59.**

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

It is understood that the purpose of the Integrated Impact Assessment Environmental Report which accompanies draft NPF4 is to identify, describe and evaluate the likely significant environmental effects of the draft NPF4 and the reasonable alternatives and is therefore in essence an Strategic Environmental Assessment (SEA).

The City Region Deal Partnership recognises this as a complex and substantial undertaking, particularly in light of its crosscutting nature embracing a wide range of Scottish Government portfolios, and it is noted that it has drawn on the advice of the statutory Consultation Authorities and resources of a number of agencies including Public Health Scotland. It appears to have had regard to a panoply of environmental considerations including Biodiversity, Flora and Fauna, Population and Human Health, Climatic Factors, Air, Water, Soil, Landscape and Geodiversity and also Cultural Heritage and Historic Environment.

It is acknowledged that the SEA has been undertaken by the Scottish Government's experienced Environmental Assessment Team and the City Region Deal Partnership has confidence in the scope of the document and in the process of the SEA itself.

**Q60.**

**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 response is submitted.

**Q61.**

**What are your views on the potential health effects of the proposed national developments as set out in the environmental report?**

No response is submitted.

**Q62.**

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

No response is submitted.

**Q63.**

**What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?**

No response is submitted.

## **Society and Equalities Impact Assessment**

**Q64.**

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

No response is submitted.

**Q65.**

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

No response is submitted.

**Q66.**

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

No response is submitted.

**Q67.**

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

No response is submitted.

**Q68.**

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

No response is submitted.

**Q69.**

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

No response is submitted.

### **Business and Regulatory Impact Assessment**

**Q70.**

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

It is understood that the Business and Regulatory Impact Assessment (BRIA) looks at the likely costs, benefits and risks of any proposed primary or secondary legislation, which in this instance is draft National Planning Framework 4 (NPF4) with the objective of using evidence to identify options that best achieve policy objectives while minimising costs and burdens as much as possible.

The City Region Deal Partnership recognise that NPF4 is a high-level document and will somewhat inevitably have an impact on the business sector across Scotland but especially those sectors who most require to engage with the planning system. While the enormity of such a task is recognised task to try and comprehensively identify and meaningfully quantify in conventional terms costs and benefits, Appendix 2 to the assessment does appear to have a number of gaps. In particular, NPF4 will have a significant impact of planning resources in terms of the additional staff and skill sets which will be required. It is not clear that the skills and human resources necessary to deliver NPF4 are available.