

# Edinburgh and South East Scotland City Region Deal Joint Committee

**10am, Friday 3 March 2023**

## **National Planning Framework 4 (NPF4) – Update**

**Item number 6.7**

### **Executive Summary**

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At a meeting on 11 January 2023, the Scottish Parliament voted in favour of approving National Planning Framework 4 (NPF4). It was subsequently adopted on 13 February 2023.

NPF4 makes significant changes to Scottish Government's planning policy placing greater emphasis on the planning systems role in achieving net carbon zero and reversing biodiversity loss. It promotes a more compact form of development and reaffirms the importance of town centres and an infrastructure first approach to development.

This report provides an overview of the revised planning framework with a focus on its role in achieving the aspirations set out in the City Region Deal Regional Prosperity Framework. The report also summarises the asks from the partnership in its submission to the consultation on draft NPF4 and the changes which were made in response to these asks.

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## National Planning Framework 4 (NPF4) - Update

### 1. Recommendations

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- 1.1 The Joint Committee is asked to:
  - 1.1.1 Note the adoption of National Planning Framework 4 (NPF4) on 13 February 2023;
  - 1.1.2 Note that on adoption of NPF4, Scottish Planning Policy (2014) and the Edinburgh & South East Scotland Strategic Development Plan (SDP) were superseded;
  - 1.1.3 Note that only some of the City Regional Deal submitted comments to the consultation on the Draft NPF4 have resulted in changes to the framework; and
  - 1.1.4 Note that NPF4 now provides the framework for progressing a revised Regional Spatial Strategy for the region which, while not part of the statutory development plan, will inform the preparation of local development plans.

### 2. Background

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- 2.1 At a meeting on 11 January 2023, the Scottish Parliament voted in favour of approving National Planning Framework 4 (NPF4). It was subsequently adopted on 13 February 2023.
- 2.2 NPF4 is the long-term spatial plan for Scotland with an outlook to 2045. It will guide development through a set of national planning policies, designated national developments and a range of regional spatial priorities.
- 2.3 Upon adoption NPF4 became part of the statutory development plan and, in doing so, replaced the SESplan Strategic Development Plan (SDP1) as part of the development plan. SDP1 is, therefore, now superseded and has no formal planning status.
- 2.4 Given this, retaining a regional planning focus will take on greater importance as there is now no strategic development plan for the region. While the preparation of a Regional Spatial Strategy will go some way to addressing this gap, it will be a non statutory document.
- 2.5 Similarly, Scottish Planning Policy (SPP) (2014) is also replaced by NPF4 and SPP no longer represents Scottish Ministers' policy on planning.

- 2.6 NPF4 will also have a significant bearing on how partner local authorities undertake preparation of Local Development Plans (LDPs). In particular, it guides how they should quantify future housing requirements and allocate development sites. It requires plans to have an increased focus on how the planning system can contribute to achieving net carbon zero, improve health and well-being, and secure positive effects for biodiversity and nature recovery. All of these will equally be considerations for the future prosperity of the region and the protection of its natural assets.

### 3. Main report

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- 3.1 NPF4 is the long-term spatial plan for Scotland with an outlook to 2045. It will guide development through a set of national planning policies, designated national developments and a range of regional spatial priorities.
- 3.2 NPF4 differs substantially from previous iterations of the National Planning Framework and Scottish Planning Policy which were largely focused on facilitating development and economic growth. While these remain important considerations, 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.
- 3.3 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.
- 3.4 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.
- 3.5 NPF4 comprises three main parts – Part 1 which sets out the National Spatial Strategy for Scotland to 2045; Part 2 which sets National Planning Policy and Part 3 which constitutes a number of appendices including Appendix E which defines the Minimum All-Tenure Housing Land Requirement (MATHLR) for each local authority area for the next 10 years. Although the requirements are grouped by regions there is no regional component to the land requirements.
- 3.6 A short summary of each section follows:

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

- 3.7 This section sets the overall framework for development in Scotland to 2045. Understandably, the framework is linked to a number of national policy positions, perhaps most notably to achieving a net carbon zero Scotland, and sets out how the planning system can assist in achieving this.
- 3.8 There are also links to other national policy statements and strategies including the National Biodiversity Strategy, the National Transport Strategy, the Infrastructure Investment Plan and the National Strategy for Economic Transformation.

- 3.9 The framework sets six overarching spatial principles – A just transition to net zero; Conserving and recycling of assets; Local living; Compact urban growth, Rebalanced development with a focus on areas of past decline; and Rural revitalisation. These in turn are expected to deliver – Sustainable Places; Liveable Places and Productive Places.
- 3.10 Part 1 also identifies 18 National Developments which will support the strategy. Those which are of greatest and specific significance to the region are:
- ND5: Urban Sustainable Blue and Green Surface Water Management Systems.
  - ND6: Urban Mass/Rapid Transit Networks (for Edinburgh and Glasgow).
  - ND7: The Central Scotland Green Network.
  - ND9: Edinburgh Waterfront
  - ND15: Industrial Green Transition Zone
  - ND18: High Speed Rail
- 3.11 As part of the overall national spatial strategy, NPF4 identifies regional spatial priorities for five geographies within Scotland. Two of these are relevant to the region One covers the central belt and is referred to as the ‘Central’ area and the other called ‘South’ and covers mainly Scottish Borders and Dumfries & Galloway.
- 3.12 The section links the national strategy to the priorities for each area. Helpfully these priorities are broadly consistent with the aims and objectives of the City Region Deal partnership, including those set out in the Regional Prosperity Framework. There are links to other national policies and strategies together with some guidance on matters which may be considered in forthcoming regional spatial strategies.

## **Part 2 - National Planning Policies**

- 3.13 NPF4 sets out 33 revised National Planning Policies. These are effectively directions for matters to be covered in revised Local Development Plans but also include matters which should be considered in the determination of planning applications.
- 3.14 The policies themselves are very specific and, on the face of it, definitive. However, NPF4 advises that the individual policies should not be read in isolation but as a whole. Some policies remain contradictory to one another and NPF4 acknowledges this. Where there are contradictions NPF4 confirms that it is for the decision maker to consider which should take precedence.
- 3.15 It will take some time to fully digest the policies and contradictions and inevitably implementation will be informed by practice and, quite possible, challenge – either through appeals or indeed through the Courts. For this reason, some caution should be taken about establishing definitive interpretations at this stage. However, some of the more significant policies from a regional perspective are as follows:
- Policy 1:** Significant weight to be given to the global nature and climate crisis when considering development proposals.
  - Policy 3:** Development only to be supported if they are able to demonstrate and include measures to conserve, restore and enhance biodiversity. This doesn’t apply to householder developments.

**Policy 6:** Developments that result in the loss of ancient woodland should not be supported nor should those which have an adverse impact on native woodlands, hedgerows and individual trees of high biodiversity value.

**Policy 9:** Proposals on greenfield sites should not be supported unless specifically allocated in LDPs. Brownfield development should be prioritised but the biodiversity value of brownfield sites which have naturalised should be taken into account.

**Policy 11:** Development proposals for all forms of renewable and low carbon energy production including windfarms and solar arrays should be supported.

**Policy 16:** Housing developments of 50 or more homes are to include statements on community benefits, including enhancements to local infrastructure, facilities and services. Development proposals for new homes on land not allocated in the LDP are not to be supported unless delivery of the housing land pipeline is happening faster than expected.

**Policy 25:** Developments which contribute to local and regional community wealth building are to be supported. Development proposals linked to community ownership are to be supported.

**Policy 27:** Drive through food facilities are not to be supported unless on sites specifically allocated in the LDP. This policy also introduces constraints on non retail uses in town centres including hot food takeaways (including permanently sited vans) betting offices and high interest money lending premises particularly in disadvantaged areas.

### Part 3 – Appendices

- 3.16 The final part of the framework details a number of appendices which aim to provide further guidance about the implementation of the framework.

### Response to the City Region Deal Partnerships Response to the Draft NPF4

- 3.17 On 4 March 2022, the Joint Committee approved [the proposed response](#) to the then ongoing consultation on the Draft NPF4. The consultation comprised 70 questions and the agreed response contributed on the majority of these questions while noting that many were non-strategic in nature and primarily for individual local authorities or partners to respond on.
- 3.18 The response was broadly supportive of the aims and objectives set out in the proposed NPF but there were a number general comments and some more specific asks in the partnership's response to the consultation. The most significant asks (in bold) and the response (in italics) are set out as follows:

**It was noted that the draft lacked detail on how the aim and objectives would be achieved and, specifically, there was little detail about the delivery programme. This was noted as an issue which arose across a number of the aims but not least in relation to the infrastructure first approach set out in the plan.**

*Unfortunately, the Adopted NPF4 continues to lack detail on how the aims and objectives can be achieved. It indicates that development of the delivery framework will be the subject of further work and engagement.*

**The response noted a requirement in the draft NPF4 for a Regional Developer Contribution Framework to be established for the Edinburgh City Region. The response set out a number of challenges in delivering this. The response noted the importance of securing developer contributions towards infrastructure but asked for the specific reference to the developer contribution framework to be removed.**

*It is pleasing to report that the requirement has been removed from the Adopted NPF.*

**The response asked that the Borders rail line extension be recognised as a national development and provided a justification for this.**

*Unfortunately, this request was not accepted and the rail line is not identified as a national development. No specific reason for this is set out by the Scottish Ministers.*

**The response set out concerns about the blanket approach to establishing 20 minute neighbourhoods and identified particular challenges in achieving this in the remoter communities in the region.**

*The Adopted NPF4 has changed the policy wording to make this an aim where it is appropriate rather than on a blanket basis.*

## **Next Steps**

- 3.19 As set out earlier in the report, NPF4 is now adopted and should be reflected in planning decisions across the city region. Specifically, for the partnership the framework sets out a requirement for the preparation of regional spatial strategies which reflect the aim and objectives in NPF4 at a regional level.
- 3.20 Arrangements are in place to progress this work and some progress can now be made. However, further specific guidance is to be produced and it will be necessary to see this in order to complete the task. Joint Committee will be kept advised on progress with this work.

## **4. Financial impact**

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- 4.1 NPF4 itself does not create any financial impacts. However, there will be significant capital and revenue costs associated with delivering sustainable economic growth, achieving net carbon zero and reversing biodiversity loss 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. The Regional Prosperity Framework (RPF) will have a key role in achieving this going forward. The emerging NPF was a consideration in the preparation of the RPF and there are there is good alignment with the aims and objectives of each framework.
- 5.2 The preparation of the Regional Spatial Strategy will also have an important role in binding the aspirations in NPF4 with the aspirations set out in RPF and linking those through to local development plans. Further guidance on Regional Spatial Strategies is awaited and when this is available early progress can be made.

## 6. Background reading/external references

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- 6.1 On 6 March 2020 the Joint Committee approved the Regions Response to the NPF4 “Call for Ideas”.
- 6.2 On 4 March 2022, the Joint Committee approved the proposed response to the then ongoing consultation on the Draft NPF4.
- 6.3 NPF4 accessible at: [National Planning Framework 4 - gov.scot \(www.gov.scot\)](https://www.gov.scot/national-planning-framework-4)

## 7. Appendices

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