

# **PERTH AND KINROSS COUNCIL**

**9 March 2022**

## **SCOTTISH GOVERNMENT CONSULTATION: DRAFT NATIONAL PLANNING FRAMEWORK 4**

**Report by Head of Planning & Development/Chief Planning Officer  
(Report No. 22/46)**

### **PURPOSE OF REPORT**

This report outlines the key elements of the Draft National Planning Framework 4 (NPF4) which sets out the Scottish Government's long-term plan for Scotland, identifying where development and infrastructure is needed and the policies required to deliver it. The aim to achieve a net zero sustainable Scotland by 2045 is embedded within the Framework and throughout the policies, with a greater emphasis on placebased planning. NPF4 will also replace the Scottish Planning Policy.

Officers generally support the values and green emphasis presented within the draft. The overall future vision for 2045 and the clear focus that NPF4 places on sustainability, climate change, reaching Net Zero, biodiversity and place making is welcomed. There is, however, concern about what the National Planning Policy section will mean for the production of the Local Development Plan (LDP) and the practical implications for decision making in Development Management. There is also concern regarding the effectiveness and deliverability of NPF4 in the absence of a supporting Delivery Programme and information in relation to commitment of financial resources. The Draft NPF4 places additional requirements on Planning Authorities, and introduces many areas requiring particular specialist skills and areas of expertise which will require additional funding for upskilling. These additional requirements go beyond the 49 new duties placed on Planning Authorities through the Planning (Scotland) Act 2019.

Approval is sought for the proposed response to the consultation and for it to be submitted to Scottish Ministers thereafter.

### **1. BACKGROUND**

- 1.1 The Draft National Planning Framework 4 (NPF4) was laid in the Scottish Parliament on 10 November 2021 and published for consultation, the period for which ends on 31 March 2022. The final adoption date will depend on the approval of NPF4 by the Scottish Parliament. However, current expectation is that a finalised version will be laid for approval by summer 2022. The consultation document can be viewed by using the following link: [Draft National Planning Framework 4 - Scottish Government - Citizen Space \(consult.gov.scot\)](https://consult.gov.scot/draft-national-planning-framework-4-scottish-government-citizen-space). It sets out a vision for Scotland in 2045 and a long term spatial strategy. It also sets out a revised suite of national planning policies. Once adopted, these will replace the current Scottish Planning Policy

published in 2014. In line with the provisions made in the Planning (Scotland) Act 2019, NPF4 will become part of the statutory Development Plan, meaning that it carries weight in decision making and will play an important role in informing future Local development Plans (LDPs).

1.2 The document is split into 5 parts:

- **Part 1 - National Spatial Strategy**

The national spatial strategy sets out a shared vision where each part of Scotland can be planned and developed to create: Sustainable, Liveable, Productive and Distinctive places. Underpinning the national spatial strategy are a series of spatial principles. The spatial strategy also highlights five action areas, mapped in a broadly indicative manner and overlapping. Perth and Kinross spans three spatial areas: *Central Urban Transformation, Northern Revitalisation and North East Transition*. This generally reflects the differing economic geography that the council area covers.

- **Part 2 - National Developments**

National developments are significant ones of national importance that will help to strongly support the delivery of the spatial strategy. Designation as a national development establishes the need for it, but does not remove requirements for relevant consents to be obtained before development can begin.

- **Part 3 - National Planning Policy**

35 national planning policies are set out, which will replace those currently found in the Scottish Planning Policy. These are categorised into 4 areas: Sustainable Places, Liveable Places, Productive Places and Distinctive Places. Sustainable places are considered universal policies that should apply to every development. These are: to have a plan-led approach to sustainable development, to ensure the development addresses the climate emergency and nature crisis, to address human rights and equality, encourage community wealth building and to design high quality places. The other 3 categories of policy should be applied to new development where applicable.

- **Part 4 - Delivering Our Spatial Strategy** This provides an outline of how the strategy will be delivered. It will be developed into a standalone delivery programme once NPF4 has been approved and adopted.

- **Part 5 - Annexes**

Annexes provide information on how statutory outcomes are being met, and Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland, along with a glossary of terms.

## 2. PROPOSALS

2.1 The consultation asks a series of questions in relation to the 5 parts of the document. The key issues raised are discussed in this section of the report with the full more detailed proposed response to each question set out in Appendix 1.

2.2 Officers have attended a variety of workshops and discussion groups with colleagues across Scotland and have worked collaboratively with other internal teams and external advisory bodies to identify the key issues to raise during this consultation period. These are set out below in paragraphs 2.5 to 2.5.38. In addition to the specific questions set out in the consultation, there are a number of general areas of concern which have been highlighted by the Royal Town Planning Institute Scotland (RTPI) and Heads of Planning Scotland (HOPS) in their responses to the Local Government, Housing and Planning Committee which officers consider should be supported in the Council's response. These responses can be viewed by using the following links respectively: [RTPI | Local Government, Housing and Planning Committee's draft NPF4 call for evidence](#) and [hops-response-to-npf-4-parliamentary-questions-10th-jan-2022.pdf \(wordpress.com\)](#). These concerns include the need to ensure that:

- there is a capital investment programme working alongside the NPF4 to provide the resources to deliver the development and infrastructure required to achieve its aspirations and ambitions
- there is adequate investment in planning services to ensure there are planners in place to manage the service and cover the 49 new and unfunded duties which were placed on Planning Authorities through the Planning (Scotland) Act 2019
- each and every policy in the Framework provides clarity and certainty to give confidence to decision makers and helps deliver the outcomes for the NPF4 set out in the Planning (Scotland) Act 2019
- alignment is in place with other strategies and that these are up to date
- there is clarity in definitions of key concepts such as 20 minute neighbourhoods, community wealth building etc, especially given the semi-legal nature of planning.

2.3 A briefing session on Draft NPF4 was held on 24 February to inform members of the content of NPF4 and to provide an opportunity for issues to be raised. The key concerns raised related to the policy framework and also the need for collaboration across all stakeholders, in particular health providers, with concern about silo mentality, and the need for other National Strategies to be aligned with NPF4. In terms of the policy framework, concerns related to contradictions between policies, for example directing development towards brownfield land instead of greenfield land without addressing viability issues. The challenges of making planning decisions where NPF4 policies contradict adopted LDP policies especially where the national policy wording is vague was also raised. These concerns are included within the proposed draft response set out in Appendix 1.

2.4 Discussion at the briefing session also touched on the need for the policy framework to provide certainty in relation to the capacity of individual housing sites. Whilst this is a matter for Local Development Plans to consider, the increased emphasis in both Draft NPF4 and the Draft Local Development Plan regulations and guidance on making LDPs: more delivery focused; evidence based; presented as a collation of site briefs and masterplans; and prepared

collaboratively, should lead to more certainty over the development delivered on individual housing sites.

- 2.5 The headline response officers propose making for Perth and Kinross is summarised as follows, with page references related to the NPF4 consultation document:

### **Part 1 National Spatial Strategy**

- 2.5.1 The National Spatial Strategy contained within Draft NPF4 is described as a shared vision to guide future development in Scotland, in a manner that reflects the Scottish Government's overarching spatial principles. It sees each part of Scotland as being able to contribute to achieving that vision, and also as having the potential to be planned and developed to create sustainable places, liveable places, productive places, and distinctive places. Officers agree with this vision.

### **Overall views on National Spatial Strategy**

- 2.5.2 Overall, officers agree with the proposed National Spatial Strategy. It says the right things and if implemented would, no doubt, deliver upon the desired outcome of a sustainable, liveable, productive and distinctive Scotland. However, there are genuine concerns as to how difficult it will be to deliver many of the actions to the benefit of everyone and everywhere, without significant investment in people, places and infrastructure; as well as joined up collaborative working and culture change amongst all stakeholders in the planning system. Planning Authorities will require a robust and enforceable policy framework; and local authorities, along with communities generally, will need the necessary investment backing to help make it happen. Strong support nationally and locally will be vital to implementation, whether that is via the local decision-making process with elected members or through the planning appeals processes.

### **National Spatial Strategy Diagram (page 5)**

- 2.5.3 The National Spatial Strategy Diagram fails to show the connections between Perth, Stirling and Glasgow, suggesting that Perth – Stirling – Glasgow is not a 'Strategic Connection'. It is recommended by officers that this is reviewed and updated to reflect the strategic transport connections between these cities.

### **Action Areas for Scotland (page 11)**

- 2.5.4 The Action Areas appear to align with Scottish Cities Alliance agenda and City & Regional Growth Deals for the country's network of cities within the relevant action areas. However, there are concerns about the badging of specific areas which could result in a negative outcome for others. Many of the priorities and opportunities mentioned against specific Action Areas are prevalent beyond the boundaries identified, and in some cases are national issues, and should therefore be appropriately broadened.

- 2.5.5 The overlapping boundaries of the proposed Action Areas causes some confusion, with Perth and Kinross being covered by three overlapping Action Areas that need to be overlaid to understand the full implications for the area. The removal of Strategic Development Plans and the introduction of Regional Spatial Strategies under the 2019 Act further complicates the picture; and the status of these new area designations for Development Management decision making is unclear.

#### **Northern Revitalisation Action Area (pages 19-24)**

- 2.5.6 This area broadly includes the Highland Council area with parts of Argyll and Bute, Moray and much of the national parks. There are links west and north to the island communities. This part of Scotland is highlighted for the strong contribution it can make towards meeting net zero targets and a nature positive country through demonstrating how natural assets can be managed and used to secure a more sustainable future.
- 2.5.7 The strategic actions and summary of challenges and opportunities for this area are supported by officers, in so far as it relates to parts of Highland Perthshire. However there are concerns regarding the planning powers available to facilitate delivery of ambitions for the future of the area without it resulting in a piecemeal, tick box approach which will lead to detrimental impacts on important natural and cultural assets. A marked change in attitude and approach to recognising the benefits of nature-based solutions and delivery of high-quality development in places to ensure the achievement of multiple benefits is critical across all stakeholders. Much work is required in terms of education, awareness and understanding. Working with communities to understand their needs and ambitions for their place will also be key, especially to achieve their support and implementation. A two-way flow of interaction, engagement and idea and knowledge sharing discussions from Regional Land Use Partnerships down to community developed Local Place Plans and back up the way will be crucial.

#### **North East Transition Action Area (pages 25- 28)**

- 2.5.8 This area broadly includes Aberdeen City and Aberdeenshire with links through Moray towards Inverness, and south towards the Tay Estuary. This section highlights the need to move industry and business away from the oil and gas sector and to transition towards a cleaner, greener, net zero future. Priorities for change will also focus on improving local liveability, regenerating coastal communities and decarbonising connectivity.
- 2.5.9 The strategic actions and summary of challenges and opportunities for this area are supported by officers in so far as it relates to parts of Perth and Kinross and the strategic connections within and out of the area. However, there are concerns about achieving some of the actions in practice, particularly in relation to improving local liveability through the creation of 20 minute neighbourhoods and the commitment to building with nature. Like many of the actions identified across NPF4, they will require a strong planning policy framework and a change in mindset across all stakeholders.

## Central Urban Transformation Action Area (pages 31-39)

- 2.5.10 The vast majority of Perth and Kinross lies within this action area. In its entirety, the action area broadly covers central Scotland from the Glasgow City Region and the Ayrshires in the west, to the Edinburgh City Region in the east, including the Tay Cities, the Forth Valley and Loch Lomond and the Trossachs National Park.
- 2.5.11 This section highlights the need to make significant changes to the densely populated central belt area of Scotland if we are going to achieve our climate change commitments; through reducing emissions, decarbonising buildings and transport, tackling congestion, making more efficient use of existing land and buildings, connecting to renewable heat and electricity networks, and creating more inclusive, greener, and sustainable places for the future.
- 2.5.12 The summary of challenges and opportunities for this area are largely supported. However, there is also an opportunity in this area, particularly within Perth and Kinross for the reskilling and upskilling of the workforce linked to 'green jobs.' For example, this could utilise the area's natural assets linked to low carbon energy technology installation, peatland restoration, natural flood risk management, tackling the biodiversity crisis, and afforestation
- 2.5.13 Paragraphs 2.3.12 to 2.3.19 below cover the priorities proposed in NPF4 for the Central Urban Transformation Action Area.
- 2.5.14 **Pioneer low-carbon, resilient urban living** – This strategic action is supported by officers, but there are concerns about its implementation particularly within existing places. A culture change and new approach to consider these areas will be required as well as significant investment in resources and infrastructure to make it happen. The delivery of infrastructure to support 20-minute neighbourhoods remains one of the biggest obstacles to overcome. Infrastructure such as schools, healthcare facilities and opportunities for play and recreation all require investment and engagement with multiple stakeholders from the outset to embed these requirements in the Local Development Plan.
- 2.5.15 **Re-invent and future proof city centres** – The strategic actions identified for the area are largely supported by officers. However, in terms of Perth, it is also worth noting ongoing important work to deliver local heat and energy networks and to make Perth the 'Biodiversity Capital of Scotland.
- 2.5.16 **Accelerating urban greening** – This strategic action is supported by officers. However, as commented before, it will require a change in approach and mindset across all stakeholders to recognise the potential opportunities associated with delivering such spaces and connections for multiple benefits. In addition, Planning Authorities will need all stakeholders playing their part as well as strong support from the Scottish Government to ensure developers sign up to this agenda, and they understand the benefits to be realised and

deliver upon. As with the other actions, significant investment in resources and infrastructure will be necessary.

**2.5.17 Re-use land and buildings** – This strategic action is supported by officers and particularly welcomed is the statement that *‘a combination of incentives, investment and policy support for productively reusing brownfield land and buildings at risk will be required to steer development away from greenfield locations.’* Planning Authorities will also need strong and robust powers to enforce this for incidences where building and land owners do not comply and where unlawful demolition occurs.

**2.5.18 Invest in net zero housing solutions** – This strategic action is supported by officers. Developers will need persuading to recognise the benefits of more sustainable nature-based solutions and how they can not only contribute to tackling climate change and achieving net zero. This also includes how they can improve the health and well-being of a community, as well as future opportunities, and make their developments and the surrounding area more attractive. However, to have the desired effect, these measures cannot be applied in a minimum standard, tick box or “greenwashing” approach, they need to take a whole site and beyond approach to be meaningful. Furthermore, it should not be possible for agreed natural solutions to be eroded at later stages via applications to vary conditions. Planning Authorities will require the necessary policy support to enforce these features and measures.

**2.5.19 Reimagine development on the urban fringe** – Again this strategic action is supported by officers. These green areas and natural spaces on the outskirts of our urban areas are extremely important assets which should be protected and, where appropriate, enhanced to provide a range of benefits to neighbouring populations. Landscape capacity studies will be important in identifying important assets and features for protection as well as opportunities for enhancement and innovation. Ensuring the relevant active travel infrastructure and connections are in place to provide access to these spaces will also be important to their continued use and enjoyment. There is a real opportunity to introduce outdoor educational resources too, particularly linked to nature-based solutions.

**2.5.20 Improve urban accessibility** – This action is supported by officers. However, significant investment will be required to ensure alternatives to the private car are available, not just in Glasgow and Edinburgh, but in the other cities within the Central Urban area. This includes active travel links, EV charging networks, and a viable and reliable public transport system. Active and low carbon travel options need to be easy and attractive if we are to achieve the required modal shift.

**2.5.21 The Action Area Diagram** on page 31 requires amending as it shows part of Perth and Kinross as being within the Central Scotland Green Network which is incorrect. As previously mentioned in relation to the National Spatial Strategy Diagram, the route from Perth to Glasgow via Stirling should be included as a strategic transport connection. Other proposals which are

recommended to be identified as National Developments are set out below under Part 2 National Developments.

## **Part 2 National Developments (pages 44-67)**

- 2.5.22 Draft NPF4 identifies national developments as “significant developments of national importance that will help deliver our spatial strategy.” Eighteen national developments are proposed within the document, ranging from single large scale projects or collections and networks of a number of smaller scale projects. The intention is that these developments will act as exemplars of the place principle and placemaking approaches.
- 2.5.23 In general, it would be helpful to include in NPF4 recognition of, and encouragement for, the potential to replicate some of these national developments in other parts of Scotland, building on experience gained for specific projects/developments for e.g. Central Scotland Green Network, and Urban Sustainable, Blue and Green Drainage Solutions. Dundee Waterfront is included with reference being made to its expansion to include Michelin Scotland Innovation Parc in support of the Tay Cities Regional Economic Strategy and its continued use for economic purposes. Perth and Kinross has not been identified for any specific developments but will be required to contribute to the Scotland-wide targets, including the active travel network, circular economy materials management facilities, the digital fibre network, pumped hydro storage and strategic renewable electricity generation and transmission infrastructure.
- 2.5.24 Alongside NPF4, Transport Scotland has been developing the second Strategic Transport Projects Review (STPR2) to help inform transport investment in Scotland for the next 20 years. A draft was published for consultation on 20 January with a 12 week consultation period that ends 15 April 2022. Some of the draft NPF4 national developments are also STPR2 recommendations which presents the opportunity to embed the importance of “place” across land-use planning and transport. Draft STPR sets out key themes and recommendations for projects. Some of these are specific to the Tay Cities Region and others are applicable to multiple regions, but will have a particular benefit to the Tay Cities Region. It should be noted that, at this stage, the findings and recommendations are not committed to by the Scottish Government. Whilst the interventions and proposals presented are viewed as the priority for investment, in many cases that investment has not yet been confirmed. However, it is disappointing to note that some specific interventions that were sifted in during earlier stages of the process have been subsumed into larger, more generic recommendations. These contain no detail of what the grouped options include and how they performed at the detailed appraisal stage.
- 2.5.25 An example of this is improvements to the A9 junctions at Broxden and Inveralmond that were sifted in (and therefore an acceptance that there was a case for change) at the initial appraisal stage and were grouped with other North east Trunk Road interventions. However, it is unclear if these specific interventions will still be progressed by Transport Scotland as part of the



recommendations. Council officers will continue to engage with Transport Scotland officials and their consultants to get further clarity and details around these issues during the consultation process before making a formal response by 15 April 2022.

2.5.26 The following projects within Perth and Kinross are recommended for consideration for national development status:

- **Electric A9** - Work with Transport Scotland to deliver the Electric A9 project.
- **Regional Innovation Park, Perth West** - A significant development opportunity that features in the Scottish Government's capital investment prospectus and which subject to a robust business case, the UK Government commits to invest up to £5 million in on-site infrastructure. The Perth EcoInnovation Park will offer 20 hectares of serviced plots with a smart infrastructure backbone to support eco innovation investment and business growth. It will include a clean energy transport hub and innovation highway and will focus on logistics, advanced manufacturing energy systems, research and Innovation/education, and mobility services transport. Funding to support this was agreed by Council at its meeting on 23 February 2022.
- **Perth – The Biodiversity Capital of Scotland** - The Perth City Leadership Forum has a vision to make Perth the most sustainable small city in Europe and, as part of this, to make Perth the Biodiversity Capital of Scotland. Restoring, regenerating and enhancing Perth's biodiversity will help address the twin climate and nature crisis and the need for a step change in action to overcome this. The twin issues of nature loss and climate change are entwined and as such, this workstream to support nature in Perth will also help mitigate the effects of climate change.
- **Perth Smart Energy City Programme** – The Programme aim is to make Perth one of the first UK cities to be net zero using smart and off grid energy systems. It includes a series of related projects to generate renewable energy, store energy and decarbonise Perth city's infrastructure, buildings, transport and heating systems and services at the pace necessary to meet climate change targets.

### **Part 3 National Planning Policy**

#### **General Comments in relation to policies**

2.5.27 In overall terms, officers consider that the policy wording is too loose and imprecise and will not stand up to rigorous and forensic legal challenges, weakening the opportunity to drive change through the policy intentions. It needs to be more clear, precise and unambiguous. The policies in NPF4 require to be clearly understandable and deliverable. Officers also believe there are too many "coulds" and "shoulds" rather than directing change. The policies must provide the utmost clarity for those submitting planning applications and for those who will be using the framework to inform decisions they need to make on development proposals.

- 2.5.28 There are many good policy examples and clarity in the current Scottish Planning Policy (SPP) which have been lost in the integration process, and there is an overall confusion between development planning and development management policies.
- 2.5.29 There is a lack of interaction between some parts of the policy sections. Officers suggest that cross referencing between policies should be introduced to link up and strengthen the policy framework.

### **Sustainable Places: Policies 1-6 (pages 68-72)**

- 2.5.30 **Policy 2: Climate Emergency.** This policy sets out an overarching requirement to consider the Global Climate Emergency and also introduces new considerations/requirements. All development should be designed to minimise emissions over its lifecycle in line with decarbonisation pathways set out nationally. The Policy indicates that development proposals (on their own or when considered in combination with other proposals, allocations or consented development) that will generate significant emissions should not be supported unless suitable justification can be provided evidencing that the level of emissions is the minimum that can be achieved for the development to be viable and the proposed development is in the long-term public interest. For development classified as national, major or requiring an Environmental Impact Assessment, a new 'whole-life assessment' of greenhouse gas emissions should be accompanied with the submission, and emission off-setting measures may be considered where permission is minded to be granted with a focus on on-site measures (including nature-based solutions) where possible. The Policy also notes that development should build in climate change adaptation/mitigation measures and should generally be supported.
- 2.5.31 Whilst the overall principle of the policy is welcomed, officers have concerns around implementation with further clarity required around the scale of application and specific detail on standards and requirements around use of some of the terminology including: 'significant weight should be given to the Global Climate Emergency', 'minimum that can be achieved for the development to be viable', and 'whole-life assessment'. There are also concerns around the need for a consistent, agreed set of criteria to support the policy, as well as the additional time and resources required in terms of upskilling planners/decision-makers in this specialist role and potentially requiring consultancy support.
- 2.5.32 **Policy 3: Nature Crisis.** This policy sets out an overarching principle for biodiversity enhancement but also introduces new considerations. Development Plans should facilitate the creation of, and protection and enhancement of, "nature networks" which are defined as networks which connect biodiverse areas. A new requirement for large developments has been introduced to require significant biodiversity enhancements above mitigation. This is more commonly known as biodiversity net gain, with proportionate enhancement to be provided by local development. While the

introduction of net gain is welcome, officers have concerns about the looseness of language and misapplication of the mitigation hierarchy.

### **Liveable Places: Policies 7-15 (pages 73-85)**

2.5.33 **Policy 9: Quality Homes.** A new policy for Gypsy/Traveller sites has been introduced replacing the policy in LDP2. As in Scottish Planning Policy, there is a requirement to identify land for sites in development plans where there is a need, although the mechanism for this is not explained. The Housing Needs and Demands Assessment (HNDA) is not a suitable tool for this exercise which is best carried out at a national or regional level to ensure the needs of those travelling into the Council area are recognised.

2.5.34 **Policy 13 – Sustainable Flood Risk & Water Management.** Officers have concerns over the wording of this policy, including seeking a definition of a committed flood protection scheme, and there are the resource implications for flood management. Experience of the Perth and Kinross LDP2 Examination highlights the different ways we can reduce risk without unduly restricting allocations and development.

### **Productive Places: Policies 16-23 (pages 86-96)**

2.5.35 **Policy 17 – Sustainable Tourism.** Officers welcome the overall principle to support tourism facilities/accommodation. This policy seems to be focused primarily on mitigating the impacts of tourism and not generating sustainable tourism that is aligned with the net zero agenda. For example, how should tourism businesses be required to link to sustainable transport, waste management, carbon reduction, improved environmental resilience, energy efficiency etc. It is considered that an additional policy criterion should be added, noting that all proposals under Policy 17b will be required to ensure compliance with all other relevant planning policies as part of the consideration of the overall principle of the development. In relation to Policy 17f, specific terminology on what constitutes a 'tourism-related facility' will be important in implementing this policy.

2.5.36 **Policy 19 – Green Energy.** There is general officer support for the emphasis the policy makes on achieving Net Zero through green energy, including through repowering of existing sites. However, with the removal of the existing spatial framework and the subsequent 'open-door' policy approach, there is the potential that environmental and social concerns may not be suitably addressed, particularly where the Perth and Kinross area has an abundance of environmental sensitivities. Further clarity is also required in relation to current legislative provisions for requiring specific developments to incorporate low and zero carbon generating technologies.

### **Distinctive Places: Policies 24-35 (pages 97-111)**

2.5.37 **Policy 28 – Historic Assets & Places.** Officers have some concern around the lack of reference to archaeology within the subsections of the policy. Archaeology is often unseen and therefore perceived as of less community

interest. However, often findings have the potential to develop a greater understanding of historic settlement development and are the potential scheduled monuments of the future. This is a fundamental omission to the policy, which refers largely to national designations but focuses less on local sites and how to manage them.

- 2.5.38 **Policy 31 – Rural Places.** The more relaxed and proactive approach to development in remote rural areas, whilst giving local authorities the option to maintain a more restrictive approach in accessible and pressured areas, is cautiously welcomed by officers. Clarity is sought on how planning authorities are to identify accessible, intermediate and remote areas. Further clarity is also sought on wording as some of the directives are too vague and could lead to misinterpretation.

### **Policy Omissions**

- 2.5.39 **Landscape.** Landscape considerations were specific and prominent in decision making criteria in Scottish Planning Policy. While landscape in protected areas and with regards to specific policies, such as renewable energy and the green belt, general landscape considerations are largely absent. Unprotected landscapes are a valuable commodity in Perth and Kinross and this would mark a major shift in policy. Officers intend to recommend that a policy be introduced as a standalone policy or incorporated into the more significant policy areas such as urban edge and rural places.

- 2.5.40 **Part 4 Delivering Our Spatial Strategy.** As noted above, Part 4 provides an outline of how the strategy will be delivered, with no information around provision of resources. The approach to delivering NPF4 as outlined is supported in principle by officers. However, this is subject to sufficient resources being available to carry out the various new duties that have been brought about. In particular, there will be a need for new and additional specialist skills and funding to suitably prepare, carry out and assess the various new reports, audits and processes required, along with the support to be provided to local communities for the preparation of Local Place Plans. The significant requirements for new assessments, audits and other statutory development plan work should be recognised and considered in any work to explore and update the arrangements for resourcing of the planning system.

### **Part 5 – Annexes**

- 2.5.41 **Annex B Housing Numbers.** The draft NPF4 proposes that LDPs will be required to identify a housing target for the area it covers in the form of a Housing Land Requirement. For the first time, this Minimum All Tenure Housing Land Requirement (MATHLR) will be set by the Scottish Government for each local authority area rather than being determined at the regional or local level. The draft NPF4 sets a proposed MATHLR for Perth and Kinross of 8,500 units over a 10 year period in line with the Council's own proposal, and this is welcomed by officers.

### 3. CONCLUSION AND RECOMMENDATIONS

- 3.1 The publication of the draft NPF4 is welcomed as is the direction of travel promoted through the draft Framework. There is general support by officers for the values and green emphasis presented within the draft. The overall future vision for 2045 and the clear focus that NPF4 places on sustainability, climate change, reaching Net Zero, biodiversity and place making is welcomed. There is, however, some concern about what the National Planning Policy section will mean for the production of the Local Development Plan and the practical implications for decision making in Development Management. There is also concern regarding the effectiveness and deliverability of NPF4 in the absence of a supporting Delivery Programme and information in relation to commitment of financial resources.
- 3.2 It is recommended that the Council:
- (i) approves the detailed response to the consultation questions set out in Appendix 1; and
  - (ii) delegates any formatting and presentational changes to the document to the Head of Planning & Development prior to its submission to Scottish Ministers

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#### Approved

Name	Designation	Date
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## 1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

<b>Strategic Implications</b>	<b>Yes / None</b>
Community Plan / Single Outcome Agreement	<b>yes</b>
Corporate Plan	<b>yes</b>
<b>Resource Implications</b>	
Financial	<b>None</b>
Workforce	<b>None</b>
Asset Management (land, property, IST)	<b>None</b>
<b>Assessments</b>	
Equality Impact Assessment	<b>None</b>
Strategic Environmental Assessment	<b>None</b>
Sustainability (community, economic, environmental)	<b>None</b>
Legal and Governance	<b>None</b>
Risk	<b>None</b>
<b>Consultation</b>	
Internal	<b>List various</b>
External	<b>None</b>
<b>Communication</b>	
Communications Plan	<b>None</b>

### 1. Strategic Implications

#### Community Plan/Single Outcome Agreement

- 1.1 NPF4 will when adopted form part of the Development Plan for Perth & Kinross and will contribute to the delivery of the Perth and Kinross Community Plan/Single Outcome Agreement in terms of the following priorities:

- (ii) *Developing educated, responsible and informed citizens*
- (iii) *Promoting a prosperous, inclusive and sustainable economy*
- (iv) *Supporting people to lead independent, healthy and active lives*
- (v) *Creating a safe and sustainable place for future generations*

#### Corporate Plan

- 1.2 NPF4 will when adopted contribute to the achievement of the following Council's Corporate Plan Priorities:

- (ii) *Developing educated, responsible and informed citizens;*
- (iii) *Promoting a prosperous, inclusive and sustainable economy;*
- (iv) *Supporting people to lead independent, healthy and active lives; and*
- (v) *Creating a safe and sustainable place for future generations.*

## 2. Resource Implications

### Financial

- 2.1 There are no direct financial implications arising from the recommendations in this Report

### Workforce

- 2.2 N/A at this stage

### Asset Management (land, property, IT)

- 2.3 N/A

## 3. Assessments

### Equality Impact Assessment

- 3.1 Scottish Government have undertaken a number of Integrated Impact Assessments in relation to preparation of Draft NPF4 as follows:

- [Integrated Impact Assessment: Non-Technical Summary](#)
- [Integrated Impact Assessment: Environmental Report](#)
- [Integrated Impact Assessment: Society and Equalities](#)
- [Integrated Impact Assessment: Partial Business and Regulatory Impact Assessment](#)

- 3.2 Responsibility for these assessments rests with Scottish Government. The proposed consultation response itself has been considered under the Corporate Equalities Impact Assessment process (EqIA) with the following outcome:

- (i) Assessed as **not relevant** for the purposes of EqIA

### Strategic Environmental Assessment

- 3.3 No further action is required as the proposed consultation response does not qualify as a PPS as defined by the Act and is therefore exempt.

### Sustainability

- 3.4 N/A

### Legal and Governance

- 3.5 *None*

## Risk

3.6 None

## **4. Consultation**

### Internal

4.1 Various teams were consulted across the Council including Transport Planning, Road Maintenance Partnership, Sustainable Development and Climate Change, Structures and Flooding, Regulatory Services, Culture and Community Services, Development Management, Estates, City Development, ECS Resources, Joint Board for Health and Social Care, Equalities, Community Greenspace and Employability and Skills.

### External

4.2 Officers from Planning & Development have attended a variety of workshops and discussion groups with colleagues across Scotland and have worked collaboratively with external advisory bodies including Heads of Planning Scotland, The Royal Town Planning Institute and Scotlands Towns Partnership, to identify the key issues to raise during this consultation period.

## **5. Communication**

5.1 N/A

## **2. BACKGROUND PAPERS**

Draft National Planning Framework 4 (NPF4)  
Planning (Scotland) Act 2019

[RTPI | Local Government, Housing and Planning Committee's draft NPF4 call for evidence](https://www.rtpi.org.uk/local-government/housing-and-planning-committee/draft-npf4-call-for-evidence)  
[hops-response-to-npf-4-parliamentary-questions-10th-jan-2022.pdf](https://hops-response-to-npf-4-parliamentary-questions-10th-jan-2022.pdf)  
[wordpress.com](https://www.wordpress.com)

Scottish Planning Policy 2014

Report to Planning Policy, Practice and Improvement MOWG 19 May 2021 –  
National Planning Framework 4 – Housing Land Requirement initial Default  
Estimates

## **3. APPENDICES**

Appendix 1 – PKC Consultation Response : Draft National Planning  
Framework 4