

Appendix 1 to Report 106/22

Draft Angus Council consultation response to Draft National Planning Framework 4 : Scotland to 2045.

General

Form and Presentation:

- 1.1 The document length and general complexity does not encourage community and wider involvement/engagement. It is currently presented as a 130 page pdf and could in its final form could be more digital and map-based. The graphics used are so imprecise as to be confusing and there may be opportunity for greater use of diagrams and maps. Full accessibility of the framework must be designed into the format.
- 1.2 The addition of cross-referencing of policies throughout the document and inclusion of a new section expressing clearly the interrelationships between relevant parts of NPF4, and other Government strategies and plans, with any conflicts addressed would be extremely helpful.

Development Plan Status:

- 1.3 The change in status of NPF4 to form part of the statutory development plan is very significant and requires that it is presented in the clearest, most useable form and that the policy content stands up to legal scrutiny and challenge.
- 1.4 It is also important that in the period until local authorities have a new local development plan in place, in the event of incompatibility between NPF4 and the current Plans, the more recent document would prevail. The provision of guidance and transitional arrangements to support local government implementation of NPF4 would be welcomed.

Community Involvement:

- 1.5 The length of the current document and the degree of complexity are likely to discourage and confuse the many organisations and communities which will need to understand how the policies and strategy might affect their places and the way they live. The draft indicates that a 'radical change' is required in order to deliver on the ambitions of this plan – that directly impacts the way people live and the choices they make. This will also set the context for the preparation of the local development plan which is envisaged as much more collaborative and community focussed than before. It is vital that appropriate assistance is made available to support the wider ambition and the societal changes required, and that this extends beyond the adoption of NPF4.

Part 1 : The National Spatial Strategy

- 1.6 The draft NPF should be the spatial expression of all Scottish Government policy and would be helped by indicating the important relationships with other plans, programmes and policies which are fundamental to the overall ambitions. It would also benefit from inclusion of the current context, including the population and economic position of Scotland and a statement of the policy aims in that regard which are compatible with the overarching climate and nature recovery ambitions. Using that contextual information may be utilised to add nuance to the strategy, for example identifying parts of Scotland that could use policy measures to attract population and

investment and other parts where aims should seek to maintain balance and limiting adverse impacts.

- 1.7 Better articulation of the relationship between the provisions of the NPF, regional spatial strategies and local development plans would also help clarify the overall development plan context for Scotland.
- 1.8 As drafted, this part of the draft NPF is particularly lengthy, and is presented as a series of 4 themes, 6 overarching spatial principles and 5 action areas, each with multiple actions. The relationship between these elements could be expressed more clearly and may benefit from fundamental reconsideration. The approach in NPF3 at present is much clearer with the common priorities articulated once – this could be enhanced through illustrating on a map which part of the country the common priorities relate to alongside the locationally specific priorities.
- 1.9 The 6 overarching spatial principles are not well related to the rest of the content and could be set out in a way that makes it clear how these will be addressed by the policies in Part 3. The significance of ‘infrastructure first’ and ‘the place principle’ to delivering the core objectives of climate change and nature recovery might merit their specific inclusion within the overarching principles.
- 1.10 The current presentation of the national spatial strategy is not helpful. In particular, the identification of 5 action areas represented diagrammatically without clear definition, the text indicating the priorities for each. These areas are geographically wide-reaching across areas which are vastly different. It does not work well in articulating the national strategy, recognising the commonality and synergy that extends beyond ‘regional’ or other constructs. The presentation means that some areas appear to be less significant, and their contribution potentially underappreciated. Many parts of Scotland are overlapped by more than one action area. There are actions/priorities common to many parts of the country which are repeated with slightly different emphasis across some or all action areas, and where there are geographical similarities, this does not come through.
- 1.11 There is very limited reference to Angus in the draft, with no specific spatial guidance. Spatial priorities relevant to Angus can be found including importance of environmental quality, development in rural areas, sustainable travel, renewable energy, blue/green economy and the role of ports and the significance of town centres. As drafted, these are not set out in a way which makes it clear which of the national spatial priorities are important for Angus to take account of. It is important that the role Angus can play in supporting the national spatial strategy can be more clearly understood.
- 1.12 It appears that the interests of Angus fall into three of the five action areas, predominantly the Central Urban Transformation area by virtue of being part of the Tay Cities region (broadly central Scotland from the Glasgow city region and the Ayrshires in the west to Edinburgh city region and Fife in the east, including the Tay Cities, the Forth Valley and Loch Lomond and the Trossachs). Clearly the spatial interests of Angus are not significantly urban in nature. There is some synergy with some of the actions of the North East Transition action area (Aberdeen and Aberdeenshire, into Moray and south towards the Tay estuary) and the Northern Revitalisation area (Highland, Moray, parts of Argyll and Bute and much of the national parks (Cairngorms)), referencing local liveability and networks of communities, sustainable travel in the rural context and green networks.

Part 2 : National Developments

- 1.13 The national developments which are relevant to Angus are geographically non-specific, applying Scotland wide. The continuation of 2: National Walking, Cycling & Wheeling Network and 6: Digital Fibre Network as national developments is welcomed both of which are potentially significant for Angus. The addition of 5: Circular Economy Materials Management Facilities is important in support of the transition to a net zero economy. It is not felt that there are any other nationally significant development proposals or opportunities in Angus that should be put forward for inclusion.

Part 3 : The National Planning Policy Handbook

- 1.14 The incorporation of SPP into the draft NPF4 with some reworking of the policy coverage does not deliver a robust development plan. It is fundamental that, as part of the development plan, policies are clear and capable of being implemented avoiding opportunity for wide misinterpretation. The principal aim was understood to be a set of policies which covered matters common to planning authorities across Scotland, allowing local development plans to contain less thematic policy and focus on delivering quality places. As such the development industry would not be presented with 34 differing approaches to similar topics resulting in greater certainty and helping to aid smoother and faster functioning of the planning system. As drafted this ambition has not been achieved.
- 1.15 The policy handbook contains 35 policies on a wide range of topics (many with multiple sub-sections). Guidance for the preparation of local development plans and policies to guide proposals for development are mixed together along with supporting text. Policies must provide clarity for those preparing local development plans and related policy and strategy documents, as well as for those submitting planning applications, specialist advisors, and decision makers including the local planning authority. The instructions for LDPs needs to be sit within the national spatial strategy section.
- 1.16 Detailed consideration of the implications of Part 3 by officers is still underway. An early view is forming that restructuring this section to distinguish between policies to support the national spatial strategy and regional actions/priorities, and a suite of common policies applicable across Scotland, along with some redrafting of individual policies to remove conflicts and imprecise language would be beneficial. The interrelationships between the policies and any cross-references to relevant parts of NPF4 and other strategies and plans needs to be expressed clearly. The solution must make the policy handbook readily accessible to decision makers and the wide the range of stakeholders and communities that will need to use it.

Part 4 : Delivery

- 1.17 The draft NPF4 was not accompanied by a draft delivery programme, limiting the ability to consider the implications. Part 4 acknowledges a significant role for local government and a variety of mechanisms including local place plans, planning obligations, masterplan consent areas and investing in the planning service. The acknowledgement is welcomed, and it is understood the Scottish Futures Trust have been engaged to develop the Delivery Programme in collaboration with local government and others.
- 1.18 There needs to be a recognition that much of the infrastructure and development investment may already be in place, and that the contribution of multiple smaller changes over time to climate change objectives is also valuable. The resources to

deliver this effectively, including funding and knowledgeable teams across authorities and other regulatory bodies will be critical to delivery.

- 1.19 It is vital that local government ensures that the Scottish Government fully recognise the significant burden placed at a local level to contribute to the implementation of the spatial strategy for Scotland and that roles are clear and properly resourced. This extends to plan making, project funding and coordination, processing applications and appeals, and monitoring and evaluation. This does not solely relate to resources within planning services but more widely across Councils, requiring the most effective and efficient use is made of limited available resources to align priorities and funding within a collaborative spatial strategy.
- 1.20 Monitoring the effect on NPF4 across many indicators will be necessary and given the role of local government in applying policy through decision making it is important the mechanisms, responsibilities and resources are agreed.

Part 5 : Annexes

National Outcomes

- 1.21 The statement on how NPF contributes to the outcomes identified in the Town and Country Planning (Scotland) Act 1997 (as amended) should be central to the vision and aims. Setting the population and economic context and related policy ambitions, including the National Performance Framework/ UN Sustainable Development Goals upfront would allow a Scotland-wide perspective on how these things come together.

Minimum All Tenure Housing Land Requirement (MATHLR)

- 1.22 Angus Council welcomed the opportunity to contribute to the Scottish Government's request for input to the determination of an appropriate scale of new housing for each local authority over the first 10 years of NPF4. This was possible because the Housing Need and Demand Assessment to inform local housing strategy and local development plan was underway. We are content that the draft NPF4 Minimum All Tenure Housing Land Requirement (MATHLR) for Angus of a minimum of 2550 units (as an expression of how much land would be required) reflects our submission. It is important that there is support for a shared methodology for the determination of the MATHLR to achieve the aim of removing the debate about the housing figures from local development plan process, allowing authorities to focus resources instead on delivery quality development in the right places.