



**REPORT TO: PLANNING & REGULATORY SERVICES COMMITTEE ON
25 FEBRUARY 2020**

SUBJECT: NATIONAL PLANNING FRAMEWORK 4

**BY: DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND
FINANCE)**

1. REASON FOR REPORT

- 1.1 This report asks Committee to note and agree the Council's response to the National Planning Framework (NPF) 4 Call for Ideas which has been published with a deadline for commenting of 31 March 2020.
- 1.2 This report is submitted to Committee in terms of Section E (1) of the Council's Scheme of Administration relating to exercising the statutory functions of the Council as Planning Authority under the Planning Act.

2. RECOMMENDATION

2.1 It is recommended that the Committee agrees:

- (i) to note the publication of the Call for Ideas to inform National Planning Framework 4;**
- (ii) to agree the response set out in Appendix 1 be submitted to the Scottish Government; and**
- (iii) an event is held late March 2020 to inform the development of a Regional Spatial Strategy for Moray.**

3. BACKGROUND

- 3.1 The NPF is a long term spatial plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth. Scottish Government has started early work and engagement on the preparation of NPF4, publishing a Call for Ideas running until 31 March 2020. This is being supported through a series of events and exhibitions throughout the country.

- 3.2 The Scottish Government is seeking views from stakeholders as to what Scotland will look like in 2050 and the changes needed to get us there. NPF4 will replace NPF3 and incorporate Scottish Planning Policy (SPP) and will form part of the Development Plan in terms of decision-making.

4. **PROPOSAL**

- 4.1 NPF4 is expected to look very different to NPF3 with a longer time horizon, more regional coverage and more alignment between wider programmes and strategies such as infrastructure and economic investment. NPF4 will respond to the shift to inclusive growth, improve health and well-being of people, improve equalities and eliminate discrimination, provide a spatial planning response to the global climate change emergency, provide a renewed focus on rural development including rural depopulation, give a stronger steer on housing delivery and diversification including the setting of targets on land for housing.
- 4.2 NPF4 will take into account Regional Spatial Strategies (RSS) which will be prepared by local authorities. Scottish Government has published suggested groupings of planning authorities to work together on RSS and it was proposed that Moray was grouped with Highland Council and Cairngorms National Park Authority. However, it is understood that the two national park authorities intend to work together and that Highland are beginning to explore an RSS for Highland alone. Initial discussions with Scottish Government suggested that planning authorities may wish to work together based on City/ Growth Deal regions, however, it would appear that an RSS for Moray will need to be prepared, which will then be included within NPF4.
- 4.3 To assist planning authorities, the Scottish Government has offered a grant of £5,000 to each planning authority to assist with the development of RSS and it is suggested that this be used to fund a participative event in late March 2020 to inform the RSS.
- 4.4 Comments in response to the Call for Ideas have been invited on any aspect, with 5 issues highlighted in particular;
- What development will we need to address climate change?
 - How can planning best support our quality of life, health and wellbeing in the future?
 - What does planning need to do to enable development and investment in our economy to benefit everyone?
 - How can planning improve, protect and strengthen the special character of our places?
 - What infrastructure do we need to plan and build to realise our long term aspirations?
- 4.5 The Council's proposed response is set out in **Appendix 1** which aims to support the underlying aims of streamlining the planning system.

4.6 Key points set out in the response are;

- The potential for the Local Development Plan and its Delivery Programme to co-ordinate and plan for future infrastructure requirements. However, if the planning system is to have a greater enabling and delivery role, then a co-ordinated infrastructure Plan needs to be supported financially with infrastructure funding devolved to planning authorities or community planning partners. If it remains nationally controlled, for each authority to bid into, then the aspiration for an infrastructure first approach will be lost.
- NPF4 will include policies, with the intention of making local development plans more place focussed. It is imperative that policies within NPF4 are detailed enough to enable planning authorities to deliver quality placemaking, inclusive growth, healthy places and address the challenges of climate change, public health reform and our ageing population. Vaguely worded national statements have no value within NPF4 and will result in planning authorities having to develop detailed policies.
- NPF4 should take a national approach to planning for food production, energy production and woodland expansion. The proposed RSS approach must be carefully managed to ensure that regional approaches do not end up at odds with this suggestion.

A national land use strategy recognising the value of prime agricultural land, identifying and delivering woodland expansion opportunities and identifying specific areas for large scale onshore wind turbines is required. Currently these three main land uses are planned for with some, but limited, overlap. The process for onshore wind in particular needs to be completely revised. Currently Reporters decisions can undermine locally developed spatial frameworks and policy guidance and the whole section 36 consenting processing sitting within the Energy Consents Units is at odds with the planning process. Key energy production “points” should be identified within NPF4, not search areas and not areas with the greatest potential. The current SPP spatial framework for onshore wind energy results in approximately 40% of Moray being identified as likely to be most appropriate for onshore wind farms over 35 metres to tip height, which is meaningless and provides no certainty to developers, planning authorities or most importantly communities.

- NPF4 must push the boundaries of the planning system and tie in with the much wider agenda and provide the framework for change. However, change needs resources and aspirations will not be delivered unless resources are provided for delivery and infrastructure planning across multiple disciplines.

5. **NEXT STEPS**

- 5.1 It is proposed to host and organise a workshop towards the end of March to explore what an RSS would consist of for Moray. Participants would include internal and external representatives from disciplines including transport,

health, economic development, environmental organisations and community representatives.

- 5.2 Scottish Government is organising a workshop event on 1 April 2020, seeking each regional grouping to provide an update on their work to date and to outline their initial outputs at that stage. Scottish Government has requested that indicative RSS be made available by the end of June 2020 to help inform preparation of the draft NPF4 which will be laid before Parliament for consultation around September 2020. A final version will be laid before Parliament in 2021.

6. **SUMMARY OF IMPLICATIONS**

(a) **Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))**

The planning system plays an important role in planning for and mitigating the effects of climate change as well as supporting the delivery of the Council's aspirations for economic development, providing land for private and affordable housing, safeguarding the environment, planning for infrastructure, delivering quality placemaking and promoting opportunities for health.

(b) **Policy and Legal**

NPF4 will have an enhanced status as part of the statutory development plan.

(c) **Financial implications**

Scottish Government has offered each planning authority a grant of up to £5,000 towards informing the preparation of indicative RSS.

(d) **Risk Implications**

There is a risk that if the Council does not prepare an RSS then it will not be included within NPF4. Inclusion may raise the profile and assist with delivery of the RSS.

(e) **Staffing Implications**

Preparing an indicative RSS within the timescales envisaged by Scottish Government will be extremely challenging given other commitments and current staffing levels. Preparation will require input from a number of internal services, including planning, transportation and economic development and a wide range of external stakeholders.

(f) **Property**

None.

(g) **Equalities/Socio Economic Impact**

None at this stage.

(h) **Consultations**

The Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Senior Engineer Transport Development, the Acting

Housing Strategy and Development Manager, the Equal Opportunities Officer and Lissa Rowan (Committee Services Officer) have been consulted and comments received have been incorporated into the report.

7. CONCLUSION

- 7.1. Scottish Government is in the early stages of preparing NPF4 which will replace NPF3 and Scottish Planning Policy. NPF4 will set out a long term spatial framework for Scotland to deliver the aspirations of the Scottish Government.**
- 7.2. Early engagement is being undertaken to help inform and shape NPF4 and a Call for Ideas has been issued with a number of set questions for the Council to respond to.**
- 7.3 NPF4 will include RSS, with funding support provided by the Scottish Government to assist with their preparation. The timescales for preparation are extremely short and will be challenging to meet.**

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Background Papers:

Ref: