

## **Aberdeenshire Council Response National Planning Framework – Call for Ideas**

Aberdeenshire Council is a rural planning authority located in the north east of Scotland. We would like to stress that impacts of decisions in preparing National Planning Framework 4 (NPF4) will reflect on both rural and city authorities. An integrated approach should be taken to ensure that the new NPF4 links together with the Planning (Scotland) Act 2019. It is also important that the new NPF4 links not only with other planning documents but with documents/strategies from other sectors, e.g. National Transport Strategy.

Planning has a significant role to play in building confidence in communities and ensuring reliance to meet future challenges. Aberdeenshire Council has considered ideas against the five questions posed by the Scottish Government in issuing its Call for Ideas. We have also considered several of the Policy Papers prepared in respect of the review of Scottish Planning Policy.

### **1. What development will we need to address climate change?**

#### Developments in sustainable locations

There is a need to ensure developments are located within a suitable and sustainable location, with a focus on development within town centres and envelopes of existing settlements. Emphasis on connections (e.g. walking, cycling, bus routes etc) to minimise reliance on private car travel. Developments should attempt to offset CO2 emissions, including during the construction phase with machinery etc. with additional tree planting (not compensatory planting for tree loss) and other methods such as carbon offsetting.

Funding and other incentives should be considered to incentivise development of brownfield development sites within towns.

Rural development outside of settlements should be minimised to reduce reliance on private servicing such as water supply and drainage systems. Use of such private services could be a 'test' as to whether development is truly sustainable. Criteria could be devised to assist assessment of sustainability of developments.

Emphasis should be placed on placemaking as a driving force behind development and not so heavily on infrastructure (i.e. roads and access) or economics.

To encourage development within towns a relaxation in other standards (i.e. car parking) could be considered to allow remediation of the site in a pragmatic approach. In these cases, a mechanism for enhancements to the surrounding area and public transport system could be possible to offset the relaxation of other standards.

There is a need to consider the potential of developing water storage facilities to serve existing (and future) rural developments to ensure those properties with a private water supply have a consistent supply of potable water.

Consideration should be given to the improvement of rail links to the north east in a bid to reduce CO2 emissions, or to retain reliance on road travel.

### Materials and design

Innovative design, building materials and techniques are to be encouraged as a standard within LDP policies and strengthened through inclusion of national policies. E.g. adopting passivhaus standards or similar as a standard.

Consider use of alternative methods of waste disposal within development schemes. Could something similar to standards within Europe (large, underground, communal waste disposal areas as opposed to individual refuse bins) be achieved in Scotland?

Where development cannot retain existing construction materials, they should be locally sourced. The importation of materials, particularly from overseas, should be discouraged to reduce the overall CO2 emissions of the development. Is there a mechanism to calculate airmiles of materials?

In an attempt to reduce impacts upon drainage systems, large hardstanding areas should be minimised, in favour of soft landscaping which would also help to offset CO2 emissions.

Buildings which are capable of being retained and reused/retrofitted should be a priority going forward. Embodied CO2 within the building materials would not be lost while additional emissions from machinery used for demolition and construction would not occur.

Solar power and other renewable domestic energy generation should be used within new builds, particularly homes. Other methods to be incorporated into designs include water conservation and green roofs for natural insulation and cooling while attracting biodiversity.

Motorised and non-motorised travel should be segregated to provide certainty of right of way. Other methods of traffic calming as per Designing Streets should still be used.

There is some conflict between planning conditions and the reality of building standard requirements. These should be married up and clarity given.

### Natural resources

Existing landscaping features within development sites should be retained as a priority to provide links to public open space and buffer strips.

Protected areas, including national and local designations should be retained, extended and a protective buffer placed around them to ensure no development encroaches into the protected area.

Development, particularly medium/large/very large scale developments should create a net gain to biodiversity through their design. Buffer strips around watercourses should be widened and linked into open spaces and corridors.

Developments should include a diverse landscape to include for example community gardens, allotments and biodiversity corridors.

Agricultural land, particularly that classed as 'Prime Agricultural Land' should be retained and undeveloped. Strength could be added to the designation of prime land to highlight its importance for food growth and production.

Flood Resilience is a key theme and should be thought about within all developments, particularly large developments with potential to impact on watercourses.

## Energy

Large scale wind energy developments, including those sited offshore, should be supported in appropriate locations, bearing in mind that there are parts of Scotland that have little, or no capacity at a landscape scale for onshore wind energy developments.

Aberdeenshire has a large coastal area and opportunities to encourage hydro-electric energy generation facilities to enhance the region's growing reputation as an energy hub.

Development of energy storage facilities at strategic points should be considered to maintain a consistent supply of energy, particularly for rural areas.

Renewable energy sources should be used within all new build developments as standard, including solar panels, ground source heat pumps. For larger scale developments, focus should be on developing a community/district heating system in addition to domestic energy generation.

## **2. How can planning best support our quality of life, health and wellbeing in the future?**

### Types of homes/ developments required

Placemaking within new developments needs to be considered from the outset. It is an important approach. Within Aberdeenshire there are six qualities of successful places and design guidance within the Proposed LDP to complement this thinking. For example, street design and furniture, functional open space (specific types of open space are not prescribed), mixed uses, walkable neighbourhoods, connectivity networks, welcoming design and safe areas all promote social interaction, use of local space and help health and wellbeing.

There needs to be a measure to ensure that open spaces deliver worthwhile green spaces and are designed into developments rather than being an afterthought. These can provide an area for social interactions between communities through the planting of fruit trees etc.

There is a requirement for joined up thinking with NHS to assist with Health Impact Assessments. These assessments should demonstrate contribution to health, this is up to developers to demonstrate wider ranging benefits of developments. This needs to be of more importance within NPF4 so it is not just seen as a tick box report required to be created.

Quality of life is important to be thought of in all new developments and there are simple things that can be done to achieve this like making walkable development and having sports facilities that are all weather facilities.

Thought needs to be given to the types of developments that are required in new developments. Houses need to start being developed so there is future proofing already within developments, e.g. to provide the ability in future for a house to support a wheelchair user, or other disabilities. Currently only 1% of new homes are fully wheelchair accessible, and retrofitting is difficult. Thoughts should be given to living and sleeping space being provided on the ground floor.

Affordable housing is in such demand. Approaches to providing affordable housing delivery should be investigated both by what is provided through allocated sites within LDPs but also creating houses that are affordable by design.

With an aging population new homes must be in accessible locations to social services. There will be a requirement for smaller households, affordable homes and improved accessibility to other services and facilities.

New residential developments will need to be designed with far less emphasis on requirements for private car usage and high timber board fencing to secure privacy, needs to be more consideration to creating social places and strong streetscapes, as per Designing Streets to aid placemaking. An exercise using designing streets should be completed for new developments to ensure residents understand the policy document.

When considering street design, RCC and planning need to link more to allow the conversation to be had with planning and roads colleagues at the same time. This is relevant through all stages from masterplans to planning applications.

Design is important to the overall sense of place and shouldn't be lost to economics.

Need to reduce inequalities is a critical part of creating healthy places to ensure that they are accessible to everybody.

Thought needs to be given to the energy ratings of new homes, a good EPC rating will help to reduce the overall living costs for residents.

Space standards in new developments are really important in new developments. The floor space needs to be able to be adaptable and liveable not just meeting the minimum requirements. There needs to be communal spaces within flatted developments and areas where people can dry clothes etc.

A means to promote mixed tenure housing is encouraged, to ensure that sections of communities aren't segregated.

Good design of housing/ new developments can contribute towards successful places. Good design in open space can also help to allow places to have a sense of identity which in turn will also help with people navigating through the area, this can be achieved through elements of public art.

With Local Place Plans being introduced they will be able to highlight areas of need within settlements, e.g. allotments. However, it is important that there is a level of expectation management with these or people won't continue to engage with them.

Place Standard could be made mandatory as part on the LDP evidence gathering to ensure that new developments are providing what the community needs.

In 2050, developments should take place only above fresh water and coastal storm surge floodplains.

Within new developments it is essential to build in Blue-Green Infrastructure and to link this to provide Blue-Green networks, using nature-based solutions to provide economic, social and ecological benefits to support quality of life, health and wellbeing. Appropriate guidance on better provision of green/blue infrastructure should be made clearer.

### Active Travel

NPF4 should facilitate planning to increase the ability to pursue active travel options and incorporate these within new developments.

Like for car parking standards in new developments there should be similar standards for cycle storage.

## Coastal Path Corridor

There should be commitment, perhaps as a national development, to creating a national coastal path corridor. Many parts of Scotland already have extensive path networks associated with the coast however some sections could be better integrated with regional longer distance routes and with local coastal resources, amenities and opportunities. Creation of a better defined coastal path corridor that protects and enhances the natural, built and cultural heritage whilst sustainably supporting development of the area's social and economic aspirations should be the primary aim of such a development. A national coastal path framework could encourage active lifestyles and promote wellbeing.

In Aberdeenshire, the coastline extends to approximately 91 miles (146 km) in length, extending from St Cyrus in the south to Logie Head near Cullen. The route already features a coastal path, and comprises cliff-top paths, extensive beach sections and some minor roads and tracks. The full route links approximately 30 settlements. As a regional asset, the Aberdeenshire coastal path appears to be an underused resource, lacking focussed or coordinated promotion and development. It is also considered that the route is currently perceived as mainly a walking route, and the potential for improving user uptake and community, cultural and heritage interest within the path corridor could be further encouraged.

Scotland's Great Trails <https://www.scotlandsgreattrails.com/trails/> illustrates this unexplored potential, with coastal examples being The Arran Coastal Way <http://www.coastalway.co.uk/> and The Fife Coastal Path <https://fifecoastandcountrysidetrust.co.uk/walks/fife-coastal-path/>.

Durham Heritage Coast <http://www.durhamheritagecoast.org/> provides another example of an integrated coastal corridor approach.

Some gaps in Aberdeenshire's current coastal path network have significant environmental or physical challenges or are too costly to bridge. This will most likely be the case within several local authority areas across Scotland. Whilst a continuous coastal path may not be feasible there are other opportunities such as the potential to link existing paths to nearby long-distance routes. In this respect The Speyside Way, The Moray Coast Trail and The Formartine and Buchan Way could be explored in an Aberdeenshire context. An Opportunity North East partner initiative is currently appraising options for a North East Highland Way which would provide a continuous circular route of around 150 miles (240 km) within the greater Grampian area.

Long term management and maintenance of coastal paths requires to be considered through the development of an integrated management strategy and plan; the aim post project being to encourage community-led management wherever possible.

## Rural Scotland

Increasing the number of people living in *remote* rural areas of Scotland needs to be reduced in preference of more accessible areas, therefore linking with the sustainability agenda.

Rural Scotland would need greater amenity like public transport, broadband more affordable and mix of house types, local employment, education and healthcare should people be encouraged to live there. Requirements like being able to do jobs remotely and to have the ability to link into public transport provision is important. It could be the case that specific travel would be required for these areas, e.g. less profit driven or subsidised for groups.

There are issues of private water supply in rural areas. There is limited capacity for water in rural areas and there is also a general presumption against lots of individual private water supplies.

Reopening rural railway into rural areas, like what has been achieved in the Scottish Borders.

In 2050, we would want resilient and self-sustaining homes within linked communities.

Near passive homes are required, while lower house running costs would encourage more people to live in rural Scotland.

Financial support for the long-term maintenance of outdoor access infrastructure would be required if more people were living in rural Scotland. This is infrastructure that is crucial for connecting rural communities but also in providing opportunities for healthy, active lifestyles. Initial development costs can be found but long-term maintenance costs are becoming an increasing barrier.

Provisions should be made to allow small farms to diversify into self-build plots and allow redundant farm buildings to be demolished and replaced with low cost energy efficient housing.

### Regeneration

In order to seek and recognise the benefits of redevelopment there may need to be the requirement to allow relaxation of certain standards for the development to have most effect (i.e. parking standards).

Devise a mechanism to assess economic benefit of new development / regeneration. There is a great need for regeneration but there are limited resources (financially and spatially) to allow this to happen.

In order to seek more regeneration in areas where it is required is there any way to remove perceived barriers for certain types of development – prior notification / PD for certain changes of use?

The emphasis currently placed on regeneration priority areas should be retained to allow for better quality of life for residents and visitors to the area.

### Town Centres

The town centres first emphasis should be retained through NPF4, the need to remain vibrant with shops located within.

To ensure that the town centre first approach is being achieved there needs to be a greater link with infrastructure provision. Making sure population is within accessible limits of public transport and then amenities.

Town Centres need to work locally, in terms of people being able to walk around in order to aid the health and wellbeing agenda. It is important that people are encouraged to get out of cars within the town centre.

Peterhead has an abundance of listed buildings within its historic centre however it is not considered an appealing place to live and work. Difficult for planning to address other than to form a visionary strategy for regeneration which might include a Conservation Area Appraisal which seeks to encourage some more vibrancy to the area. There could be a possible approach to take Developer Obligations from other sites within the settlement to invest in town centre regeneration.

Planning should help town centres adapt in order to see the creation of cycle facilities, and other active travel infrastructure.

In order to see housing development in town centres there needs to be a means for retail units to turn into housing with easier means.

### New Settlements

New settlements should be located near good transport corridors (e.g. road and rail) and within reasonable commutable range of cities.

There should also be centres of good character within new settlements. New communities, with renewables could potentially supply existing.

When there are larger developments/ new settlements the phasing of development needs to be given greater consideration in terms of how one phase affects the next phases of development.

### **3. What does planning need to do to enable development & investment in our economy to benefit everyone?**

#### Land supply and infrastructure

National Policy needs to really set the right tone and ensure development really is directed to the right places. Policies are generally positive, and we as a Council are generally very welcoming, positive and proactive in our approach. Without financial investment and enhanced powers at a local level, it is very difficult to make any significant change or “stimulate” growth.

It is incredibly difficult to resolve deprived areas through development – small retailers have closed in more prosperous areas due to shift in trends to internet based shopping; business are now flexible and work from home; and industry is more efficient and can locate where land values are low and operate efficiently due to technology. Land value is the biggest issue affecting commercial development from being directed to the right place.

Development that benefits the economy positively is required.

There is a need to ensure sufficient marketable employment/business land is made available. Medium and large scale sites for Use Class 4, 5 and 6 should be well related to existing settlements and accessible to main transport corridors.

Planning could stimulate and distribute growth by enhancing green infrastructure/connections, and reducing fuel costs through community heating and solar PV etc.

Emphasis should be placed on redeveloping brownfield sites, including through repurposing large oil/gas sites to reclaim sites for agricultural land, peat moss, community allotments.

A remediation and restoration approach should be applied to development where the lifespan of the development is known – e.g. upon permission agreement on how site will be restored or could be repurposed in 20, 30, 50 years.

National developments identified in NPF4 should in effect essentially have the principle of development agreed as to offer certainty. Then developers can simply come in with detailed design, shortening process and reducing uncertainty in order to assist deliver. Principles of development at the moment are not guaranteed, while design evolution means there are numerous stages post permission to refine – so a change in approach would allow for greater flexibility and focus on delivery of nationally important infrastructure.

Infrastructure upgrades should be a priority. In the majority of locations there is a chronic lack of infrastructure provision which in turn will negatively effect development delivery. A sustainable approach to infrastructure that is future proof is vital if Scotland’s economy is going to grow and adapt to change in the long term. The way in which people travel and connect is likely to significantly change before 2050. This should be taken into account in developing NPF4.

## Rural development

Aberdeenshire would advocate a more flexible approach to employment in the countryside. This could be achieved through a sequential approach to sites. However, large scale industrial development that do not require a rural location should be focused towards settlements.

NPF4 should promote tourism development and accommodation. Aberdeenshire is attractive to tourists due to the rural idyll. Visitors to the countryside and coastal villages should be encouraged in order to support both tourist facilities and accommodation opportunities. This in turn would support the economy through expenditure in local areas. It is important to protect and enhance the places that attract tourists and consider those developments that either adds value or detracts from these places.

Farm diversification should be encouraged i.e. through development of wedding/ event venues, farm shops, cafes, retail.

Advances in the way in which agriculture operates could change the way land is used significantly by 2050. Planning needs to take account of agriculture and how it is changing from the traditional notions. A national review of the Land Capability for Agriculture should be undertaken.

## Energy sector and renewables

Peterhead should continue to be recognised as an international energy hub.

NPF4 should recognise and support the transition towards renewable energy industry, as well as different technologies, life sciences, tourism, agriculture and food production. The shift away from oil and gas infrastructure is like to continue during the lifetime of NPF4. The development of sectors associated with energy, technology and research and development should be promoted. Energy storage facilities and smaller scale energy production facilities will be required.

Provision should be included to allow businesses to incorporate energy efficiency measures within buildings.

## Regeneration

NPF4 should identify regeneration areas across Scotland. In Aberdeenshire this would include the towns of Banff, Fraserburgh, Macduff and Peterhead.

## Emerging industries

NPF4 should promote emerging industries, particularly the film industry.

## Live/ work

The number of housing proposals including an inbuilt office space now that working from home is increasingly more common. This makes the quality and provision of

open space even more important for society as people live more secluded and separate lives.

Broadband and a move to more flexible working patterns, more people will be in a position to work from home. This should be encouraged.

#### **4. How can planning improve, protect and strengthen the special character of our places?**

##### Places for protection

Prime Agricultural Land should be retained, with its importance highlighted through additional strengthening of its designation.

Buffer strips around watercourses, heritage features and designated nature sites should be imposed.

The importance of ancient woodland and the benefits they bring should be highlighted to help its appreciation. Compensatory planting for loss of ancient woodland should not be acceptable.

Aberdeenshire has a significant opportunity to develop for tourism given the landscape and character. Existing tourism sites and facilities should be protected, and assistance given to new tourism proposals. Explore initiatives to promote tourism sites beyond the 'brown signs'.

##### Strengthen character and heritage

Blue/green infrastructure should be incorporated into development sites along waterways, woodland and other natural or historic features. For those sites not adjacent to development, a contribution mechanism could be devised.

Links between settlements via road and path should be created to allow ease of movement and spread investment.

Heritage areas should be strengthened. Clear definitions and examples to protect, enhance etc should be devised to assist understanding and ensure a holistic approach nationwide. Consideration of mechanism to assist old buildings to be retained and brought up to modern standard. This may entail the relaxation of conservation status (i.e. C Listed etc...) to allow them to be easily adapted.

Design is important to the overall sense of place and should not be compromised in a response to 'economics'. Areas where a higher standard of design should be used should be outlined, including areas such as designated town centres, conservation areas, regeneration priority zones, enterprise zones etc. 'anywhere' developments of standard design kit homes should not be considered as 'the norm'. There should be a stronger onus on using local design features and materials.

District heating systems should be used to reduce the cost of living and develop a specialist trade within the construction sector.

##### Vacant/derelict land and town centre development

Special measures for regeneration of vacant and dilapidated buildings left by absent landlords.

Incentives to make derelict land attractive to developers to offset remediation costs associated with brownfield development.

Encouragement for town centre buildings to be multi-use. For example, housing office/commercial, educational, retail, childcare and food/drink establishment so building is in constant use. There is also merit in exploring 'pop-up-shops' for vacant properties prior to entering into a lease.

### Rural areas

Consider regeneration area designation (or similar) in small rural towns and settlements for declining areas. Funding as an incentive to develop in these areas could also be considered.

Limit rural development, particularly in areas surrounding regeneration priority areas to assist focusing development and investment into town and village centres.

Green belts or similar designations should be considered around rural towns and villages to stop coalescence and to protect a declining historic building stock.

Special measures for regeneration of vacant and dilapidated buildings left by absent landlords.

The definition of what a green belt is and what the intention of having a green belt is should be made clear.

A stronger evidence base for designating prime agricultural land should be made available to help highlight the importance of the land in food production.

Peatland should be retained. A strict criterion should be devised to minimise peatland loss.

## **5. What infrastructure do we need to plan and build to realise our long term aspirations?**

### Active Travel

In the future active travel infrastructure will be as important as ever along with public travel networks.

There needs to be weather resilient modes of public transport.

### Infrastructure First Approach

Infrastructure first is currently an afterthought, and this should be promoted. It currently is dealt with through Developer Obligations which is hard for the general public to understand.

Research needs to be completed to look at how the infrastructure first approach affects the financing of new developments.

### Digital Connectivity

In order to have more people in rural areas digital connectivity will be important to ensure people can live and work from home etc. There should also be the promotion of community digital initiatives.

### Road Infrastructure / Car Parking

NPF4 should link into the National Transport Strategy.

The existing road network will need to be upgraded in order to accommodate further growth.

Car parking should be better integrated into the built environment, e.g. underground or on top of buildings.

If there is an increase in better digital connectivity, resulting in a larger percentage of the population working from home this could have a positive impact on the road network.

Within Aberdeenshire there is a local issue over bridges, there are a significant number of bridges and developments need to recognise their impact on bridges – cost over the lifetime of the development.

### Transport Connections

The exploration of the expansion of the rail network should be considered, potentially as a national development.

In order to encourage more electric vehicles there needs to be more EV charging points, there is currently not enough provision to fit into the existing network. Retrofitting these into traditional spaces/ town centres is going to be incredibly difficult.

Ferry connections outwith Scotland should be considered, for both passenger and trade.

Consideration should be given to the use of low carbon and mass transit travel including, electric plane provision and the possibility of self-drive cars.

Peterhead International Energy Hub, should continue to be considered as a connection point for Scotland and Norway.

### Water and Waste Water Capacity

The continuity of water supply and investment in water supply networks and waste water networks will be of upmost importance.

Consideration will need to be given to the provision/impact of private water supplies in rural areas. There is limited capacity for water in rural areas and there is also a general presumption against lots of individual private water supplies

### Future Planning

More collaborative working is required between Council Services and statutory consultees and service providers to have a spatial vision for settlements or communities, to ensure that they have the services required.

The capacity of the Grid needs to be considered. There are lots of renewable energy projects and supply but there is not enough storage or transmission capacity to move power around. Energy storage and battery storage is also not sustainable, so alternative approach to storage is required.

There could be a use for 3D printing in the future of the planning service, so there therefore needs to be space for this technology to develop.

Ensure there is clear recognition and 'read across' between NPF4 and the Infrastructure Commission for Scotland Key Findings Report (Jan 2020). This report works on the basis of the SG's wider definition of infrastructure, which embraces societal and ecological elements – so all housing, public buildings and green infrastructure as well as those more traditionally considered. The ICS report includes as an Appendix a Low Carbon Infrastructure Literature Review, which comprehensively examines the status quo and identifies future requirements across several sectors – notably including, but not limited to, Housing (Section 10) and Placemaking and Green Infrastructure (Section 17). Both documents should inform local authorities in carrying out their full range of functions, and merit careful examination in drawing up NPF4.

What impact is Brexit going to have on Scotland, there will be the need for improved connectivity between sizable settlements.

In order to ensure that lifelines are sustained more provision of allotment spaces within settlements should be encouraged to allow local food production and strengthening communities.

There could be extra pressure on land for different land uses, e.g. there could be more pressure on land for cemetery space.

Consideration should be given to the link between the marine environment and the terrestrial environment when it comes to any new technologies.

All new buildings/ developments to be near passive/ self-sustaining.

There is a need for older infrastructure to be brought up to current standards, can the planning system help with this.

### Natural resources for energy

Heat options for new developments should be explored as an alternative non-fossil fuel (combined heat and power, ground / air source, solar, wind).

There needs to be more infrastructure for heat networks, there is currently no mechanism to deliver or no pipework in place for this.

There is a lot of renewable energy provision in Aberdeenshire, however there is trouble in connection and grid and provision of large scale infrastructure to accommodate (substations, transmission lines).

### Education Facilities

Large scale developments bring new schools with the other housing and services but then Local Authorities have the running costs of these schools after the initial build which needs to be better planned for.

### Rural Communities

Remote and rural communities would benefit from education campuses. Create an identity related to specific industry at specific settlements and promote this through learning.

## **Aberdeenshire Council's Comments on Scottish Government's background information notes on policy topics that will need to be addressed when preparing draft NPF4**

We welcome preparation of the information notes on the existing Scottish Planning Policy. These provide a useful basis to bring existing policies up to date to ensure they remain robust and relevant in a modern planning sector.

Given that the new SPP will form part of the next National Planning Framework it is essential that policies are applicable to development proposals across Scotland. There are several policies within the existing SPP that are of little relevance or are difficult to apply in a rural context. Linked to this, there should be sufficient flexibility within SPP to allow for the differing opportunities and challenges faced by planning authorities to be addressed in local policy development. One size is unlikely to fit all in every circumstance.

We have attempted to provide comment on the information notes that are of most relevance to Aberdeenshire. We would welcome further opportunities to engage with Scottish Government in preparing policies for the draft NPF4.

### **People**

#### ***Community facilities***

- How can we ensure that the impacts of new development on existing community facilities are addressed in plans and decisions?
  - There should be a prescribed set of information contained within in settlement statements outlining the impacts of new development on existing facilities and requirements for community facilities. This should be provided in consultation with e.g. NHS Trusts.
  - Development Management (DM) must refer to LDPs and LPPs in the area (and Community plans)
  - Greater consideration of Delivery Programmes and the role they can play should be made, particularly as they are updated annually.
- How can we ensure that the planning system makes appropriate provision for community facilities, including the retention of existing facilities?
  - Authorities should liaise with Community Planners at the LDP stage.
  - POANS – community groups, especially in larger developments for community clubs/halls.
- Are there particular community facilities that the planning system should be prioritising the provision or safeguarding of?
  - Provision of cemeteries, community centres and public halls for clubs.

- How should a spatial strategy, which contributes to increasing the population of rural Scotland, ensure that population increase can be matched with sustainable provision of community facilities?
  - Need to define what is rural and sustainable to target provision of community facilities. Places that are too remote/ locations where there are few job opportunities are unsustainable.
  - School catchment area could help with identifying the catchment of a rural area.
  - Consider Community Council comments and Community Planner views in identifying areas of focus for repopulating.
  - Consider bus provision to allow people to travel, rural bridges maintained (budget cuts).
- What should the standards or requirements be for provision of different types of infrastructure e.g. education and healthcare facilities?
  - Use development obligations and conditions to provide the facility if it exceeds capacity.
- How should the planning system help to ensure community facilities are resilient to the impacts of climate change and that new development contributes to needed or aligns with already in-place climate adaptation measures?
  - Facilities should not be built in areas at risk from flooding.
  - Refuse development where there is a threat or likely threat of flooding up or down stream.
- Can NPF4 do more to promote Changing Places Toilets to encourage adequate provision and distribution of facilities in areas where they are most needed?
  - Fully accessible toilets require more space and should be in Building Standards. If not, there is merit in there being a planning policy on it under design (being adaptable).
- Is there a need for a national planning policy on cemeteries and crematoria?
  - Yes, given the rising and aging population, and competition for land.

### ***Maximising the benefits of green infrastructure***

- What is the potential for green and blue infrastructure to support our wider objectives on climate change?
  - Flood mitigation (within and outwith the planning application site).
  - Local food source.
  - Renewable energy – biomass, water and ground heat pumps.
  - Green roofs/walls.
  - Biodiversity and parklands.

- Water retention (droughts).
  - Air quality and cooling effects.
  - Disease control.
  - Reduce soil erosion / loss (and improve it).
  - Health and education (improved school yards, or local park for schools to use).
  - Improve inland and coastal water quality through SuDS, swales etc.
- What more should planning policies do to ensure that the benefits of green infrastructure are maximised, and to show increasing performance against the national indicator on access to green and blue space?
    - Open space should be phased in accordance with the agreed masterplan's phasing of homes (i.e. at the same time to avoid only homes being built and no open space). This should be set out in the planning conditions to ensure this requirement is delivered and enforceable.
- Should the potential for national standards/requirements for green infrastructure be explored?
    - Yes. This is set out in Aberdeenshire open spaces strategy. However, it is currently hard to enforce as developers can argue viability issues. Nonetheless, the health benefits of open space should make this an equal priority as affordable homes.
- Should NPF4 include policies specific to major developments to ensure that the potential for blue and green infrastructure is maximised?
    - If it ensures the delivery of green and blue infrastructure, then yes. A nation-wide approach avoids local differences and keeps it fair.
- How can NPF4 best ensure that green infrastructure policies are given appropriate regard against other issues i.e. placemaking and affordable housing?
    - Given that green infrastructure has climate, health and placemaking benefits, a hierarchy should be adopted at the early design stage (e.g. better designed SuDS to have multiple uses – biodiversity, usable open space and flood mitigation).
- What more can NPF4 do to support allotments/community growing places?
    - Make them mandatory unless the Community Plan, LPP or other (e.g. Open Space Audit) identifies no need.
    - These should be set out in an Open Space Strategy.
- Is there a need to safeguard areas of green infrastructure that provide flood risk management services, such as floodplains, river corridors and flowpaths?

- It has merits to stop development on areas at risk of flooding. Land raising should not be supported, as it has implications elsewhere. This could be as a policy with regard to SEPA's flood maps.
- Could be mapped in LDP's settlement statement (allocations) as Protected Land.

### ***Gypsy/Travellers Accommodation***

- How can NPF4 ensure that land for appropriately located public sites is made available in development plans to meet a need identified through the HNDA process?
  - Not all local authorities own sufficient land or land in the right places that can be used for public sites. NPF4 should account for local development plans that are unable to identify sufficient appropriate sites.
- What locational guidance should be provided to direct new development proposals to suitable sites?
  - There should be in consultation to ascertain the preferences of the Gypsy/Travellers in terms of location, distance from services etc.
  - Should be able to secure essential services and have reasonable access to employment, education, and community infrastructure.
- Should NPF4 include policy criteria to support acceptable proposals coming forward if there are no suitable sites identified in the development plan?
  - Yes, however there should not be an assumption that all need will and can be met through public sites so there needs to be a flexibility to have a policy criteria for privately owned sites to make up the shortfall.
  - A criteria set at a national level could provide clarity to the Gypsy/Traveller community who require sites across multiple planning authorities areas and would benefit from greater consistency in policy advice.
- Should NPF4 include policy criteria setting out the issues that should be addressed by proposals for small privately owned sites?
  - This may be unnecessary as issues can be largely addressed through other LDP policies that apply to all development e.g. providing safe access, environment protection.
  - Privately owned sites should not have to prove need as it is set up by the Gypsy/Traveller community therefore control over issues such as operating times during the year may be unreasonable. This is with the assumption that all privately owned sites are in fact set up by the Gypsy/Traveller community rather than a landowner looking to set up a site for a permanent residential caravan park.
- Is there a need to include mapping of transit routes and sites in the spatial analysis and proposals for NPF4, so that authorities can refer to this as part of the evidence base for their plans?

- Mapping could prevent the identification of public sites that would not meet the need of the Gypsy/Traveller community. Where local authorities are unable to identify specific sites, mapping has the potential to be misused to prevent privately owned sites coming forward in unexpected locations (but as they are private they would still meet need).
- Is there a need to set out what is expected to engage with, and meet the needs of, Gypsy/Travellers in local development plan evidence reports?
  - This may be beneficial particularly where there is likely to be an issue identifying sufficient sites.
- What can the planning system do to support the human rights of Gypsy / Travellers to travel? What approach and criteria should be used to inform consideration of transit sites in local development plans?
  - It can be aware of and take account of the cultural needs of Gypsy/Travellers. There should be information gathered on traditional stopping sites which could be used to inform possible locations for transit sites.
  - Local level decision making processes could be removed or limited.

### ***Health and Wellbeing***

- How can NPF4 best complement existing national and local health strategies and the public health priorities?
  - Actions/decisions must be research/evidence based – requires joined up working with health and care partners to establish what is needed and where e.g. community care and housing needs assessments carried out jointly with housing service.
  - Strongly link health to tackling climate change, in particular, lack of built-in resilience to climate change exacerbates social, environmental and economic stresses which all impact on health.
  - Recognise Public Health Scotland (the new enabling/supporting body) as statutory consultee.
- How can NPF4 best ensure that policies on health and wellbeing contribute to the outcomes of improving the health and wellbeing of people living in Scotland and improving equality and eliminating discrimination? What are the principles which might best inform the policy approach?
  - Promote good quality design as the key mechanism for improving health, wellbeing and quality of life (in a planning context), in particular housing and neighbourhood design.
  - Promote 'liveability' and 'adaptability' as design objectives in relation to accessibility, notably homes capable of being adapted to meet broad range of needs and changing needs over time.

- Promote optimal space requirements for fully accessible, wheelchair friendly, adaptable spaces (going beyond minimal space standards), although should be role of Building Standards to set these.
  - Promote age friendly, gender friendly, and accessible design in all environments, indoor and outdoor, in particular at neighbourhood level
  - Recognise that planning cannot solve health inequalities, but can play a part in ensuring equal access to good quality housing, employment, and green space.
  - In relation to planning performance framework, health and wellbeing outcomes should be evaluated in case studies.
  - Community engagement has a key role – resources already exist with relevant themes, e.g. the Place Standard Tool.
- How can NPF 4 policies on topics such as placemaking, active travel, housing, green infrastructure, town centres and air quality effectively deliver health policy objectives?
    - Incorporate 'health' into the 6 design qualities of successful places, e.g. "healthy, safe and pleasant".
    - Define the key characteristics of a 'good food environment' and how this can be applied as a policy criteria for town centre viability, and for neighbourhood design e.g. to enable planning control over fast food outlets, in particular the local food retail environment around schools, community/leisure centres, parks, sports grounds.
- What guidance do planning authorities need so that they can meet the new health provisions in the 2019 Planning Act when preparing development plans?
    - Training in relation to Health Impact Assessments.
- How can new development be provided in a manner which ensures sufficient health care services such as doctors surgeries are available for existing and new communities.
    - Relies on close working/communication with health and social care partnerships.
- Are policies needed to ensure that particular types of development do not undermine the health and well-being of communities, including the prevention of over-provision and clustering of certain food outlets? Can the planning system address hot food vans which sell predominately unhealthy food?
    - Establish a planning policy framework against which to determine planning applications on health grounds.
- How best can planning policy engage with the promotion of healthy diets?
    - Ensure the local food environment is a material planning consideration for housing developments.
    - Community food growing spaces/allotments to be encouraged by NPF4.

- Recognise that a wide range of regulatory and other actions/influences outwith land use/physical planning are needed to make healthier choices easier.
- How should the planning system ensure that health issues around mine gases in areas affected by former underground mine workings are taken into account and addressed through both development planning and development management?
  - Through Building Standards - providing guidance on adequate risk assessment.
- Do our policies sufficiently support the promotion of mental wellbeing or is further action required?
  - Good quality design is the means for ensuring access to local green spaces/nature for improved physical and mental wellbeing.
  - As per Scottish Government's Forestry Strategy, promote local wooded places as places for therapeutic benefits.

### ***Housing – General***

- Do we need to revisit the overall aim and objectives of our housing policy? Should policies continue to focus on delivering homes and the quantum of land available or are there a wider range of objectives and approaches that should be built into the policy?
  - This policy requires significant revision and rethought. The focus is currently too target driven. Targets are somewhat meaningless given that the delivery of housing is largely under private sector control and dependent on market conditions. The provision of land (as long as a sufficient supply is maintained) does not link with increased delivery of homes.
  - Policy should focus more how new housing can accommodate the range of needs as part of better integrated communities.
- How can policies better reflect the quality, distribution, type and delivery of homes and the role of housing in placemaking, and in particular the role of new housing in supporting climate change objectives?
  - There needs to be a refocus from meeting targets to detailing how mixed communities can be achieved. There are not the resources, mechanisms and data monitoring in place for planning authorities to set out the needs of specific mixes of homes (e.g. bedroom numbers, house types).
  - Making effective use of land needs to be further explored. Private sector housing generally delivers large 'executive' homes at lower densities during a buoyant market not providing the mix that is necessary for quality long term sustainable communities and increases pressure on issues such as affordability. The opposite market conditions increases site densities where issues such as reduced floorspaces of homes create lesser quality home environments and reduce adaptability to changing needs.

- Should the 5 year effective land supply continue to be a means by which the effectiveness of plans is measured? What method should be used to calculate the land supply? Should the definition of 'effectiveness' be reconsidered?
  - The effectiveness of sites is not the best way to measure the land supply available. Sites should all be effective unless there is clear evidence that a site physically cannot come forward ever (in which case this should be removed from the plan).
  - Effective/ constrained status can be easily manipulated to push further housing land to be allocated unnecessarily furthering the issue of land banking.
  - A 5 year effective land supply is unclear how this relates to the consideration of a 10year plan.
  - Completion rates should not drive the release of additional land. There is uncertainty for how long-term strategic sites can be truly accounted for as their slower delivery is often used as a reason for the release of further smaller sites to make up for the 'shortfall' in the delivery. This can only lead to the further slowing down of progress on large scale sites.
  - There is potential for a new method for calculation given that housing allocations are established as indicative numbers. Private sector during Aberdeenshire Council's Call for Sites can often under-state the numbers that will be achieved (given that during peaks in the market proposals tend towards for lower density large 'executive' homes rather than a range) which could lead to the unnecessary release of additional land. If standard densities were applied based on the pattern of development seen within existing settlement a site is part of or location of the settlement (semi-rural, rural, urban) this may encourage more effective use of land, without leading to over or underdevelopment in some areas. Another option could be to remove housing numbers out of the equation entirely by using land area – although this would be less clear for communities, the land allocations may become more focused on 'developable' areas as opposed to sites including adjacent existing landscape/environment features. This could refocus the delivery to creating places rather than meeting house numbers.
  
- How should national planning policy approach the need to achieve more efficient use of land and infrastructure resources associated with the development of housing, e.g. maximising the use of urban/brownfield locations?
  - Efficient use of land, in terms of housing, should mean ensuring mixed housetypes within sites to meet a range of need, and provide quality, adaptable developments.
  - Efficient use of land should consider minimum space standards and maintaining open space within sites.
  - Support the reuse of urban brownfield locations but not all brownfield locations for sustainability reasons (i.e. those situated within isolated countryside locations with no services).

## ***Housing - Specialist Housing***

- Is the existing policy fit for purpose given the new legislative requirements?
  - Existing policy is fit for purpose in that it meets legislative requirements in committing to meeting the housing needs of older people and disabled people and the inclusion of these in local development plans.
  - The existing policies would not provide sufficient guidance on how to address more specific targeted needs. It is unclear whether the expectation is that the general housing land supply would be the main area for delivery of particular needs. If this is the case, is the expectation that they would be achieved through design standards and on a particular scale (10% of the proposal)?
  - Need clarity on how needs are established and the evidence to monitor targets. In the case of any particular design standards how does planning ensure the implementation of internal space requirements?
- Does the policy need to be strengthened to set more consistent standards or requirements? If so, in what ways?
  - Alignment with building standards across tenures to minimise the difference between affordable and open market properties, for example to assist and enable the delivery of 'wheelchair accessible' properties. This approach would help strengthen policy, encourage a wider range and diversity (type and size) of properties across tenures and assist Local Authorities in communications with partners.
- Given our housing policy commitments and projected population and household change, what further changes or additions are required to ensure planning does all it can to support the delivery of housing to meet different needs?
  - Given the projected numbers of older people and disabled people, there is a requirement for planning to ensure a greater diversity of type/size/models of housing provision from developers to meet both current and future housing need across communities. A flexible approach to design/building standards is required to allow for properties to be easily adapted to meet the changing needs of households to allow them to remain within their communities so that they can continue to access support networks and proximity to workplace.
  - If targets for meeting needs are set, it requires consideration of how it can be monitored and implemented in practice considering the restricted resources of Local Authorities. This includes limited land supply issues as well as competing needs for delivery of affordable housing. How can it be ensured private sector housing plays its part with providing a mix of homes?
- How can more recent policy and innovation be used to inform a fuller approach to the policy?
  - The guidance to Local Authorities on setting wheelchair accessible targets is welcomed in addressing the current and future need, however Local Authorities are unable to ensure delivery without regulation of building

standards to drive the initiative forward particularly in respect of the private sector. Further discussion and agreement across the planning, housing, health and social care, third and private sectors is required to take this forward.

- How can wider / general housing policy requirements support (or hinder) delivery of this policy objective?
  - This policy area (particularly if it demands more single storey homes as would be required for meeting wheelchair targets) has the potential to impact on the viability of sites, provide housing types which may be less desired, squeeze the land area available for affordable housing and deliver homes which may not be lived in by someone with a particular need. With an agenda to increase the housing stock with more suitable homes over time, it may not address identified current needs in the right places or ensure availability when required for particular individuals.
  - Wider/general housing policy requirements can support delivery of this policy objective by working with all relevant stakeholders including RSLs, Health and Social care colleagues and the third sector with a view to improving data on the need and demand for appropriate, accessible and adaptable housing.

### ***Housing – Affordable***

- Is the existing policy fit for purpose?
  - Further consideration could be given to clarify how and when the affordable housing policy is applied to specialist housing. Given the changing demographics with an increasing ageing population it will become ever more important that we are able to apply the affordable housing policy to specialist housing to ensure that we can meet housing need for this client group. We do however recognise that it may not be appropriate to apply the affordable housing policy to all types of specialist housing such as Care Homes for example but it is vital that there is dialogue across the various stakeholders with a view to achieving clarity as to how and when this should be applied in order to best meet housing need.
  - Policy capped at 25% stops need (which is shown to be far higher in HNDA) being met unless the local authority owns available land in the right places to plug the gap. Local authorities can be reliant on securing delivery of affordable homes through S75's from private sector developments.
  - The current policy is reliant on other approaches such as the More Homes Scotland approach which does not provide long term certainty with regards to funding assistance. Problems existing with current funding streams as funding is capped per unit and thereby causes significant issues where need is highest – where land value is too high to acquire.
- What evidence is there to show that changes are required?
  - Data across a number of sources evidences the increasing ageing population and is demonstrated at more local levels through the Housing Need and Demand Assessment which informs the Local Development Plans.

- Increasing affordable housing need within refreshed HNDA's.
  - Lack of integration of affordable homes within wider development schemes as ease of maintenance (through grouping buildings or providing just one section of land to deliver one) often trumps the need for creating quality, well designed environments.
- Should tenure be made a more explicit part of housing land allocations?
    - Affordable housing should be integrated throughout to avoid large pockets of properties of the same tenure, promoting mixed and sustainable communities across different socio-economic groups, albeit recognising the need for economies of scale in terms of maintenance and management as well as social cohesion.
    - There needs to be flexibility in housing land allocations to allow the need at the time of an application to be met, not be restricted to delivering needs from a snapshot in time that may have become out of date.
- What factors should be taken into account in setting the contribution to affordable housing as a percentage of total homes being delivered?
    - Need determined by HNDA, waiting lists etc.
    - Viability.
    - Level of demand for housing in general across that housing market area.
    - Consideration should be given to housing market areas over Planning Authority areas as within one authority the need, types and tenures of affordable housing can vary vastly.
- Does the policy need to reflect different local circumstances?
    - Yes there is a requirement for flexibility to be able to respond to differing local circumstances. For example – high pressured housing market areas will typically have higher affordability ratios whereby it will difficult for households to find affordable housing that is suitable for their needs, whereas rural areas may not require the same number of affordable housing but households will still face challenges in accessing suitable affordable housing.
- Given our housing policy commitments and projected population and household change, what further changes or additions are required to ensure planning does all it can to support the delivery of affordable housing?
    - Consideration of restricted resources of Local authorities. This includes limited land supply issues as well as competing needs for delivery of specialist housing. How can it be ensured private sector housing plays its part with providing a mix of homes?
    - An effective land supply is critical to ensuring the delivery of all types of housing including affordable housing, therefore it is vital that the planning system supports and facilitates the necessary infrastructure required to ensure the delivery of any such land allocations. There are ongoing challenges in understanding the constraints across infrastructure and this can hamper and delay development often resulting in additional costs due to the

undefined capacity, unknown timescales and lack of alignment across various infrastructure providers. Infrastructure requirements are required to be factored into the viability of a development at the feasibility stage and any uncertainty regarding capacity coupled with 'unknowns' around costs and timeframes can hamper, delay or mean a development will be disregarded as unviable. This is of particular significance when developing affordable housing where the availability of affordable housing grant is time sensitive. Fundamentally a strategic, cross partnership approach is critical to ensure that the planning system supports and delivers an effective land supply which will enable a strategic approach to the delivery of affordable housing through the Strategic Housing Investment Plan.

- The overall cost of land, infrastructure and development are the largest barriers to housing delivery and the planning system working across Scottish and UK Governments should do it all it can to minimise the cost burden on providers of affordable housing. The evidence to date shows that continuing to rely on market-led delivery of housing supply is unlikely to meet future needs, particularly in the affordable sector. NPF4 must embrace opportunities to take cost out of the system and compel the build out of vacant land. These opportunities should include land assembly powers and land value uplift. While compulsory purchase is often seen as a solution, it does not take cost out of the system and does not therefore support the delivery of affordable housing. Land assembly at the right cost has the potential to transform not only affordable housing provision but the development of places that people want to live and work in.
- SPP recognises that rural exceptions policies can be used to support sites for affordable housing that would not normally be used for housing. What more can be done to recognise the transformational role of housing in relation to the wider rural economy and the need to deliver untapped housing demand?
  - Identifying housing need in rural areas can be challenging using 'traditional methods' – there is a requirement for a more nuanced approach to identifying the needs and requirements across rural areas which in themselves can vary greatly. Any indicators require to reflect local circumstances for example the use of Local Place Plans to identify local actions and solutions. Whilst housing can have a transformational role in terms of the wider rural economy it is vital that planning systems supports linkages across various sectors including transport, digital infrastructure, business development/diversification and renewable energy for example.
  - It is concerning that land described as “not normally be used for housing” can become suitable/appropriate for affordable housing. What makes that land not available in the first place – unsustainable locations, lack of access to facilities, proximity to sensitive environments or hazards? This policy conflicts with promoting “right development in the right places” and has the potential to place occupants at a greater disadvantage.
  - Self-build opportunities within rural settlements (that have facilities and services) should be promoted more with guidance to assist how this can be achieved. Rural should not mean areas of countryside as this promotes unsustainable locations for development.

## ***Housing Technical Discussion Paper***

- Aberdeenshire Council would advocate points raised in the response submitted by Heads of Planning Scotland.

## **Work**

### ***Supporting Business and Employment***

- How can we ensure that NPF4 maximising the planning system's contribution to securing sustainable and inclusive economic growth across Scotland?
  - There are two methods that can be deployed to contribute to the economic growth. First method could be that Planning can use the masterplan consent area guidance (once agreed) to approve business developments instead of undergoing the full planning process. For this, relevant policies and guidance must be in place.
  - Use of compulsory purchase powers.
  - It is necessary to assess the requirement for demand and supply of new and existing business units. This would enable to allocate business land accordingly and would make flexible to design and layout to meet the businesses' need. Planning should seek information about the forecast of the business land requirements prior to making any decision in order to protect any businesses, especially if it affects only for a short term. Relevant policies must be prepared to protect existing business parks and premises, however, should have flexibility to allow alternative developments if the industry would no longer be in use and the building/business park is unsuitable for any other business use. This will assist in securing a sustainable and inclusive economic growth for Scotland.
- How should NPF4 take account of any refreshed Enterprise Areas initiative?
  - The Enterprise Areas initiative should be assessed to ensure that the NPF4 meets its criteria and expectation and vice versa.
- Do our national planning policies need revisited to reflect our emphasis on inclusive growth?
  - Our national policies need to be revisited every 5 or 7 years to reflect the economic growth situation.
- How can we link economy and business with place and placemaking considerations, at different scales?
  - Relevant policies must be prepared to protect existing business parks and premises, however, should have flexibility to allow alternative developments if the industry would no longer be in use and the building/business park is unsuitable for any other business use.

- Given our climate change commitments, what more can NPF4 do to support different patterns of working, for example home-working, as well as integrating energy efficiency and waste innovations within business environments?
  - NPF4 can promote policies that would allow developments which would contribute to tackle climate change. These developments may include, not restricted to, home-work premises, staff accommodation that are situated close to work and approving businesses/business parks close to residential areas with inter-link connectivity (such as green path or core path and cycle path).

### ***Rural Development***

- How can NPF policy criteria most effectively contribute to the Planning Act outcome of increasing the population of our rural areas, and in consideration of resettling of rural areas that have become depopulated?
  - Areas that have been depopulated should be identified in NPP4. Locations where repopulation is an objective should be promoted and Planning Authorities directed to promote policies that may lead to development proposals coming forward that contribute towards meeting the outcome of the Planning Act. For areas that are depopulated to the extent that a community body is not in a position to prepare a LPP for their community, resources should be made available to the Planning Authority to prepare a LPP that can be taken forward as part of the LDP. Once an area has been repopulated to an extent, the community should resume preparation of the LPP.
- Scottish Planning Policy takes a differentiated approach to rural planning policy and distinguishes between three main types of rural areas based on their accessibility and degree of pressure for development. Since SPP was published, classifications have evolved, for example on sparsely populated areas. How should policy criteria be framed to recognise the needs of different types of rural areas?
  - Through experience it has provide difficult to identify the extent of the 'intermediate' areas. The Scottish Government's Urban/ Rural Classification provides a helpful guide as to the accessible and remote rural areas, however it does not present an intermediate area. If the intermediate area is to be retained then guidance is required to allow Planning Authorities to identify this area within their respective Plan areas.
- Which planning policies need to be more permissive to support sustainable rural development and help sustain and grow communities?
  - Mechanisms to promote mixed use proposals in rural areas should be promoted.
- Should national policy criteria be introduced to promote leisure accommodation, such as hutting and other recreational accommodation in rural areas?

- Yes. The matter of hutting was introduced at a relatively late stage in preparing the existing LDP. Aberdeenshire Council, for example, has taken the position that individual huts are not a form of development that are promoted within the LDP area, unless associated with a tourism proposal.
- What is the best way to balance demand for tourist accommodation with the need to ensure there is adequate and appropriate housing for rural populations?
  - Tourist accommodation should be well related to tourist attractions. Clarity on whether the use of occupancy restrictions for development providing tourist accommodation would be welcomed. This may be an instance where such a restriction may be justified and of benefit to wider rural populations who often have to compete for the available supply of accommodation. Such restrictions should be enforceable.

### ***Research on Rural Planning Policy to 2050***

- Recommendation 1 of the rural research promotes adoption of the 8-fold Scottish Government Urban Rural Classification provides a relevant and appropriate basis for characterising rural Scotland for the purposes of NPF4, and should be used as a starting point for that process. It may be necessary to modify and adapt the basic rural categories provided by the Classification to ensure their full relevance to planning. We would advocate use of the Urban Rural Classification in defining rurality but consideration should also be given to the 6-fold Classification.
- Aberdeenshire Council agrees with the key challenges facing rural areas as identified in the rural research. The challenge of “sustainability” should be added. Development in rural areas is often essential in order to meet the needs of those working in a rural environment e.g. to support agricultural, forestry and wider industries associated with rural sector such as tourism. However, development in rural areas is usually an unsustainable form of development by virtue of distance from facilities and the need to travel to access services. Rural areas are not often served well by public transport and as such there is reliance on private car – an unsustainable mode of transport.
- In accessible rural areas there is pressure for development as individuals wish to live in a rural setting but have the convenience of being situated in relative close proximity to service centres. This demand for development is causing an adverse impact on the rural setting and leading to suburbanisation of the countryside. Development should be directly to settlements in the first instance and additional controls should be placed on accessible rural areas to ensure that the sense of place is maintained.
- The fifth challenge identified in the rural research outlines that some stakeholders expressed concern at a tendency to seek to protect rural areas from development rather than to support development. We would not wish to see carte blanche approach to development in the countryside but instead an approach that promotes the right development in the right place that needs the social, economic and environmental needs of a particular rural area. A degree of control is required

to protect rural characteristics and it is believed that it is appropriate to direct development towards settlements in the first instance and there should be a flexible approach to development in the countryside to meet the needs and demands of the particular area. To this end, we would agree with recommendation 5 of the research paper, namely that planning should also recognise and develop housing policies suited to rural areas, where housing is perceived as a transformational form of development in relation to the wider rural economy and societal needs.

- Wholeheartedly agree with recommendation 6 that NPF4 should offer explicit encouragement to using place-sensitive approaches to settlement, which determine the development of existing and new settlements in response to the particular challenges, needs and opportunities of different areas.
- Recommendation 7 of the research outlines that NPF4 should promote the sustainability of living and working in rural areas, recognising the possibilities afforded by new technology and the social and environmental benefits of having people on the land. As part of this, consideration should be given to a national programme of rural transport enhancements which collectively amount to a 'national development'. We would offer our support for this recommendation.
- We agree with recommendation 8 – Development of the digital fibre network was designated a national development in NPF3. NPF4 should continue to support its ongoing national roll-out and enhanced telecommunications infrastructure. This can help to achieve the 'death of distance' made possible by such developments in remote connectivity.
- We agree with recommendation 9 in that NPF4 should provide a clear steer on planning policy in regard to new waves of renewable energy development, in particular in relation to areas that are identified as having significance in terms of their landscape, biodiversity and/or carbon sequestration values (e.g. National Scenic Areas, 'Wild Land Areas', peatlands). Tolerance towards cumulative impacts should be outlined both in terms of the same types of renewable developments as well as visual impact of cumulative renewable projects e.g. solar, wind, etc.
- We support recommendation 11 that supporting small businesses to survive and grow is essential for rural areas. Particular recognition should be given to the retention and attraction of value-adding processes in rural areas. NPF4 should outline whether it is expected that in the first instance that business development should be directed towards settlements in order to promote sustainable development, or whether there is a threshold for which should apply. In practice rural businesses based on number of employees is difficult to monitor and enforce. Expansion of small businesses is also promoted as an intensification of an existing use.
- As technology improves small business start-ups, diversification and home working should be promoted. Innovation should not be stifled through planning policy. The principle of the right development in the right place should however be respected in this regard.

- NPF4 should promote an approach to planning which links the three goals of conserving of the natural and historic environment, responding to the climate emergency and sustaining more resilient rural communities.
- Although there has been a general shift in the rural economy away from traditional land-based industries, such industries continue to play an important role, especially in more Remote and Sparsely Populated areas. Development that continues to support these traditional and primary industries should be promoted in any revised national policy.
- We would suggest that recommendation 13 does not go far enough to recognise the role of land based industries which play a vital role rather than just an important role. In tackling climate change and in a post-Brexit world, we in Scotland are going to have to become more self-sufficient in terms of resource use and in food production, production and distribution. Diversification at some level is essential in supporting land based industries and a business's ability to react to economic and social change.

### ***Tourism***

- The need to highlight and support the importance of tourism to the Scottish economy.
  - Tourism plays an important role in the Scottish economy and it contributes to the GDP. It brings in jobs for the residents of Scotland. There should not be an overreliance on tourism but it should be recognised as a key sector. Opportunities for diversification into tourism, whether that be as an accommodation provide and/or visitor attraction, should be encouraged.
- How can our planning policies help to ensure that tourism benefits all parts of Scotland, particularly those areas that depend on the jobs and income that it creates?
  - Planning policy can ensure that areas that are popular for tourism are protected from other development. Justification should be sought for development other than tourist related activities in these sites.
  - It may be possible to map the most used tourist areas and establish a link or connectivity, this may assist in safeguarding the areas required at regional or national level. A policy can be used to ensure that these sites are safeguarded for tourism and tourist related activities to ensure a balance is struck.
- How best to afford protection to important tourism assets and ensure that local development plans and planning decisions recognise this importance?
  - The Scottish Government may wish to identify the "important tourism assets" by producing a map and a list and these sites can become the identified sites that require protection. This would assist in establishing a robust policy that

would protect these sites and tourist related developments and activities within the surrounding areas, at national and local plan level.

- The local development plans can ensure that tourism assets are protected and favour developments that have a positive input into the tourist related activities and also business activities (such as hotels near an airport or edge of town centre). The local development plans must be flexible towards tourism policy and allow tourism related developments to expand where appropriate.
- What is the best way to balance demand for tourist accommodation with the need to ensure there is adequate and appropriate housing for rural populations (taking into account associated policy developments around Short Term Lets)?
  - It can be balanced by allocating land for specific developments within the local development plan. This way, this balance can be managed and meet everyone's need. Currently, there is no policy on short-term lets or holiday homes and the Government may choose to promote such policies to ensure that housing for rural populations are protected. For example, at present, it is not required to seek planning permission to change an existing domestic dwelling to a holiday home or letting the property. A new policy can address this and provide guidance on what needs to be applied to permit such change.
- How can policy best link tourism with other policy areas including active travel, green networks, leisure and recreation, economic development, transport, etc?
  - Masterplanning would assist in achieving the criteria's mentioned above. In addition, policies can ensure that any development delivers active travel and green network and establish good connectivity.

### ***Town Centres***

- What are the challenges facing town centres in the short and long term and are existing policies sufficient to support likely change and adaptation?
  - The challenges that the town centres are facing in the short term are closure of traditional high street retailing, café and restaurant (if there are excessive number of them in the same town centre). In the long run, if the number of shops and services closes gradually, the town centre would diminish eventually.
  - The National planning policy does not provide efficient guidance and nor created a robust policy that ensures that town centres are protected, however, the policy is flexible enough to support the changes the centres may endure. This being said, it may lead to the loss of town centre permanently. At Local Development Plan level, it is the individual council's decision on how robust they intend the town centre policies to be, that said, some are better than others. Therefore, the planning policy at Scottish Government level must be more detailed and more guidance needs to be provided to ensure that town centres are protected in the long run. The policies are sufficient to support

changes and adoption of the town centres of the future, however, the policies are not aiming to protect the concept of “Town Centre”.

- A lot of town centres are lacking a square or a focal point, although it is more visible in the older town centres. This assists in connecting the town centres from all sides, and usually play as an important point for meeting. A focal point is advantageous in every town centre.
- What issues are shared across all town centres and therefore suitable for inclusion in a national policy, and what matters are more likely to require locally driven policies and approaches?
  - One of the main issues shared across all town centres are the lack of services that attracts the users. The traditional high streets are no longer in demand, therefore, most of the traditional high street shops are now being replaced by café/takeaway and other services. A diversity of services is now required to keep the town centres active. Furthermore, on-street activities such as farmer’s market do not take place in every town centres, which would be able to attract users.
  - Town centres are considered to be a place for socialisation and the national policy needs to address this in the relevant policies and focus on how to deliver them.
  - “Town Centre Health Checks” would enable to identify issues around each town centres and the findings should be used to identify solutions to any issues that may only exist in that particular town centre.
- Is guidance needed to assist planning authorities with the identification of local networks, centres and their boundaries and town centre health checks?
  - Each local authorities should be able to identify their own local networks, centres and their boundaries. However, guidance would be beneficial which would assist in identifying the definitions and criterions of these. A robust methodology for Town Centre Health Checks are required so the assessment can be conducted correctly.
- Can more be done to ensure that town centres are accessible, connected and safe places for all?
  - Regeneration or Masterplanning can be used to address anything that can be improved such as accessibility (green network from different parts of the town) and connectivity. The Town Centre Health Check assessment should aim to establish whether the town centre is deemed to be a safe place and if not, if there is anything planning can do to improve this. In many instances, human activity creates a place that is lacking in a feeling of safety, as opposed to the place-making itself.
- The interaction between the town centre first approach and the wider place principle and any implications that might have for policy?

- The wordings of the policies should reflect each other to ensure this.

## **Place**

### ***Coastal Planning***

- Can policies in NPF4 do more to support the resilience and sustainability of coastal communities, particularly in light of the expected long term impacts of climate change?
  - Yes, the projected impact of climate change on our coastline needs to be emphasised and greater priority given to the threat of coastal erosion. The long term impacts of which need to be determined.
  - Development in coastal areas needs to be carefully managed.
- How can NPF4 best complement existing policies and guidance, such as the National Marine Plan and Dynamic Coast?
  - Clear links to the NMP and any regional plan should be made.
- Is there a need for further policy or guidance that specifically addresses the marine/land interface, going beyond or building in the key elements of Circular 1/2015?
  - Yes.

### ***Green Belts***

- Is the existing policy approach to green belts fit for purpose? What aspects need to change?
  - Yes.
- How prescriptive should NPF4 be in identifying the issues for planning authorities to consider when designating green belts in local development plans and determining planning applications?
  - The existing guidance provided by SPP is sufficient.
- Should NPF4 / regional spatial strategies have a role in identifying green belts? Or should this be left to local development plans?
  - No, it is not believed that RSS should have a role in identifying green belts. RSS should recognise that in cities and towns there may be pressures surrounding these places for development that may warrant the identification of a green belt but it should be for individual LDPs to identify the boundaries of any green belt in the Plan area.

### ***Infrastructure Planning and Delivery***

- What should be the key priorities for national policy to embed an infrastructure first approach into development plans?
  - Infrastructure first approach ensuring that new developments have access to the right amenities.
  - A key priority should be to ensure that we are moving towards embedded infrastructure being low carbon infrastructure.
- There is limited reference in the current SPP to the principle of development mitigating its impacts, including the impacts on infrastructure provision and the use of planning obligations to achieve this. What factors should be taken into account when developing a policy statement in NPF?
  - Impacts on community infrastructure and how improvements on this type of infrastructure can be achieved through development.
  - New types of infrastructure which are sustainable, such as low-carbon heat networks, should be embedded in policy and the use of planning obligations could be key to aiding their roll out.
- What scope is there for national planning policy to address the key issue of infrastructure co-ordination through development planning and what infrastructure types should be addressed?
  - A more strategic approach/joined up approach to planning and delivery of infrastructure is needed – so it is less fragmented.
  - Greater transparency and collaboration between public and private sector.
  - Infrastructure types to be addressed – digital infrastructure, transport, waste and water infrastructure.
- The 2019 Planning Act requires local development plans to take account of education capacity in their district when developing the spatial strategy. Education provision is often a key challenge in the development process. Should a new planning policy be included to support the delivery of key infrastructure requirements (such as education) within NPF?
  - A more joined up approach is needed.
  - Education perhaps needs to be more closely aligned with Delivery Teams to ascertain timescales for development etc and what developments are constrained.
- What key factors should be included to future proof development plans so that they can anticipate and plan for the emergence of new infrastructure technology?
  - Plans to be not be overly prescriptive and have an element of flexibility when it comes to Infrastructure requirements. Balance needs to be found in terms of providing the right amount of information.
  - Thorough reviews of LDPs at the appropriate time to take place.

- Ensuring robust policies are in place to ensure developments are future-proofed for the advancement of technology such as low carbon infrastructure/development.
- Ensuring policies require developments be adaptable.

### ***Valuing the Natural Environment***

- How can NPF4 best support the role of the development plan for identifying international, national and locally designated areas and sites i.e. is guidance needed on the issues to be considered when identifying locally designated sites?
  - At a national level, NPF4 could strengthen importance of designations at all levels if sets out strategic framework where natural heritage and landscape are seen as central to (i.e. providing resources for) achieving key outcomes, in particular carbon reduction, health and wellbeing, biodiversity.
  - It is not role of NPF4 to provide detailed guidance, this is role of key agencies e.g. SNH.
- How can we ensure that the introduction of national policy criteria in NPF4 recognises and reflects the distinct role of national parks?
  - National policy criteria can establish the role of national parks in conjunction with (not in isolation from) all other designated/protected areas, ranging from large scale/regional level down to small scale local level, to reduce carbon emissions and restore biodiversity.
- What policy criteria should be included in NPF4 to ensure guidance is applied to development management most effectively?
  - Prioritise environment and society.
- How can NPF4 help secure positive effects for biodiversity from new development most effectively?
  - Establish policy framework which makes clear that reducing damage from development is no longer enough, but now have to actively reduce carbon emissions and restore biodiversity.
  - Approach needed where environmental restoration opportunities are identified to ensure there is a genuine net gain for biodiversity from all development i.e. leave the environment in a better state than before development.
  - Establish hierarchy which places environment and society first, and identify this as the 'route map' for the economy to follow.
- How can NPF4 best complement existing environmental legislation, strategies and guidance, including that from other national bodies?
  - Climate change is now the key driver and the 'common ground' across all environmental legislation/strategies/guidance.

- How planning can best support increased woodland creation and expansion and the desirability of preserving peatland, in response to climate change targets?
  - NPF4 role should be to establish a spatial plan to make the space for a growing bio economy with more wooded areas.
  - Emphasise 'right trees/right places'.
  - Recognise there can be blurred boundaries between forest/wooded areas and people, e.g. more heavily wooded housing areas.

### **Placemaking**

- Does this policy need to change – if so, in what way?
  - Clearer set of mechanisms to enforce good design (e.g. standards, the Circular Economy (so they are built to be dismantled and reused as easily as possible), making Site Waste Management Plans measurable to monitor waste reduction targets.
  - Expand the meaning of adaptable – designed to be accessible for the elderly and disabled (e.g. ramps, wide stairs, doors, wide paths around the house); gardens with features to hold water; buildings can deal with hot weather (window sizes, shutters, roof eaves).
  - Either add biodiversity as a seventh principle on quality places or expand on 'Safe and pleasant' design quality.
- What is the most effective way for NPF4 to give high level support for placemaking principles that integrate with other policy documents, such as Creating Places: a policy statement on architecture and place for Scotland?
  - Support the town centre first principles.
  - Regeneration with community participation to identify / target buildings and places in need.
  - Low carbon buildings.
  - Development needs to be of good design as per Creating Places page 10 (physical value – enhances a setting; functional value – meets and adapts to the long-term needs of all users; viability – provides good value for money; social value – develops a positive sense of identity and community; and environmental value - efficient and responsible use of our resources) that are demonstrated in the six qualities of successful places.
  - Support Place standards and other methods to identify local issues – could be used to refuse planning applications.
- How can national planning policies best support the delivery of existing core placemaking policies in development management whilst recognising the need for local flexibility?
  - Clear set of standards that can be used to refuse development, such as those set out in the Proposed Aberdeenshire LDP 2020 design appendices for major and small-scale developments and single buildings.

- Traffic light score, but only support proposals that achieve a green score – amber would identify where there are issues that can be fixed. Red score would mean it conflicts with policy, or the issue cannot be mitigated against.
- Continued stance to refuse developments with poor design – use of design tools referred to in SPP paragraph 57 and Creating Places page 10 ‘What is good design’.
- How can placemaking policies support other policies, such as housing and green infrastructure, to meet the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people?
  - Mix tenure standards.
  - Ensuring there are wide paths along the side of homes for accessibility.
- Does the climate change emergency mean that the policy needs strengthening or revision?
  - Yes. Developments should be meeting the highest building standards (Gold/platinum), which continues to be delayed. The technology exists at present. Thought given to include these in Building Regulations to be more effective and enforceable.
- Is there scope to make more of this policy area in order to encourage planning to actively enable the delivery of high-quality development?
  - Support better building standards to deliver sustainable development.
  - Push for low carbon and circular economy standards in new developments (e.g. walkable neighbourhoods, home zones, building standards, recyclable / jigsaw buildings).
  - Community engagement on design – POANS, LDPs, LPPs, Place Standard.

### ***Sustainability***

- Should the presumption in favour of sustainable development remain a component of the NPF given the move to 10-year development plan preparation and the new statutory role of national planning policy?
  - Yes, sustainability will be even more important looking further into the future.
- The merits of maintaining an overarching policy on sustainability and whether it needs to be changed as a result of the climate emergency?
  - An overarching policy on sustainability should remain. However, the individual facets of the policy may need to be fine-tuned to reflect the ‘climate emergency’ we are facing.
  - New developments should look at reducing emissions and benefitting biodiversity.

- Does 'sustainability' remain an appropriate catch-all outcome for increasingly significant policy drivers such as climate change, inclusive growth and human wellbeing?
  - 'Sustainability' effectively captures the policy drivers of climate change, inclusive growth and human wellbeing as it is based on three pillars of social, economic and environmental areas.
  - 'Catch-all' outcome of sustainability remains appropriate as it remains broad in scope which allows new and emerging issues to be addressed over the lifetime of NPF4.
  
- Should NPF be more strongly/clearly allied to the United Nations Sustainable Development Goals and, if so, are there particular goals which should be given particular attention through spatial or thematic policies?
  - To an extent, NPF could be aligned more strongly to the UN's Sustainable Development Goals. However, not all are appropriate to include in NPF, because the goals are very much focussed at a global level, which doesn't translate that effectively to the UK national level.
  - There are, however, some goals which should be given particular attention. These include Goal 3: Good Health and Well-Being; Goal 5: Gender Equality; Goal 7: Affordable and Clean Energy; Goal 8: Decent Work and Economic Growth; Goal 9: Industry, Innovation, and Infrastructure; Goal 10: Reduced Inequalities; Goal 11: Sustainable Cities and Communities; Goal 12: Responsible Consumption and Production; Goal 13: Climate Action; Goal 14: Life Below Water and Goal 15: Life on Land.
  - Of particular importance is Goal 7: Affordable and Clean Energy in the context of the Climate Emergency we face.
  
- Are there particular locations/areas where planning policy could help transformative action within the inclusive growth agenda?
  - In spatial terms, the inclusive growth agenda is about re-balancing the economy and ensuring economic growth benefits everyone.
  - In terms of looking at particular locations/areas where planning policy could help transformative action, the more rural locations/economies could have more focus to ensure a thriving Rural Scotland.
  - This may be through directing economic investment/development to these areas through policy. Alternatively, ensuring the people that live in these rural areas are connected up with opportunities that exist in the labour market.
  - This may be through better transportation options; however, the balance needs to be found in terms of ensuring options are as sustainable as possible. Additionally, digital infrastructure improvements may also help access to the labour markets in rural locations.
  - Diversification of the energy sector may also aid towards transforming rural areas as well as encouraging innovation in rural areas.
  - Cohesion Target in NPF3 remains relevant in the context of the inclusive growth agenda – aiming to narrow the gap in economic participation between the best and worst performing regions.

- How do we ensure we increase opportunities for community engagement, including community-led local place plans, so that people's views are heard and can influence policy development?
  - Strengthening the relationship between the community and the Local Authority. Developing partnerships and sharing power and decision-making.
  - Ensure that the way the Local Authority engages is inclusive for all members of the public – creating a supportive environment. For rural authorities, it is important that engagement is as inclusive as possible as digital infrastructure may be lacking in some rural locations disenfranchising some people. Demographics may mean that certain age groups are not well versed in using online platforms.
  - Embracing and normalising mini-publics, participatory budgeting and digital innovations such as online forums.
  - Citizens and community groups to be at the heart of the community engagement process.