
NORTH AYRSHIRE COUNCIL

10 March 2022

Planning Committee

Title: Draft National Planning Framework 4

Purpose: To provide the Committee with an update on the preparation of Scotland's fourth National Planning Framework and seek delegated authority to respond in full to the consultation.

Recommendation:

- 1) Comments set out in Paragraphs 2.12 to 2.23 form the basis of the Council's response to the consultation on Draft National Planning Framework 4
- 2) Delegated authority is granted to the Chief Planning Officer to complete and submit a full consultation response to the Scottish Government.

1. Executive Summary

- 1.1 National Planning Framework 4 (NPF4) will, when adopted, set out the Scottish Government's priorities and policies for the planning system up to 2045 and how the approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045. NPF4 differs from previous NPFs in two ways: it incorporates Scottish Planning Policy and the NPF into a single document and will form a part of the statutory development plan. Draft NPF4 was laid in Parliament on 10 November 2022 and alongside Parliamentary scrutiny of the draft, wider consultation is open until 31 March 2022. The continued opportunity to engage in the drafting of this hugely important national strategy is positive.
- 1.2 Four key themes pervade through draft NPF4: the creation of sustainable places where we reduce emissions and restore and better connect biodiversity; liveable places where we can live better, healthier lives; productive places where we have a greener, fairer and more inclusive wellbeing economy; and distinctive places where we recognise and work with our assets. NPF4 comprises a national spatial strategy underpinned by six overarching spatial principles and five regional action areas. Eighteen National Developments are identified to support the delivery of the spatial strategy and there are 35 national planning policies.
- 1.3 The overall aim and ambition of the draft NPF4; its future vision for 2045 and clear focus on sustainability, climate change, reaching Net Zero, biodiversity and placemaking is to be welcomed and supports North Ayrshire Council's own priorities. Community Wealth Building is also referenced throughout the document. Key planning policies, reflected in our Local Development Plan, are continued and strengthened

within draft NPF4's spatial strategy and national planning policies, including strong support for the development of brownfield sites over greenfield sites and the town centre first principle. Also welcomed is the designation of Hunterston as a National Development and reference to Ardeer. For the first time, the NPF sets a housing target for each local planning authority. The figure proposed for North Ayrshire of 2950 homes over 10 years is acceptable, if not unambitious.

- 1.4 Once adopted and part of the Development Plan, NPF4 – in particular the national planning policies – will be directly relevant in the assessment and determination of planning applications. As such, concern is expressed over the precise wording of these policies. Clarity is also sought over the spatial strategy for North Ayrshire's islands; the implementation of Community Wealth Building and the scope of the Hunterston National Development. Resourcing the planning system and the additional duties on local planning authorities – plus the delivery of plans – is brought into focus by the wide scope of the draft NPF4; there is a requirement to upskill planning departments to address a range of issues such as embedding an infrastructure-first approach and assessing proposal in the context of climate change, and for cross-service collaboration in the preparation and implementation of the NPF. Officers continue to work through the significant content and detail presented within Draft NPF4 to prepare a cross-service response to the consultation to be submitted to Scottish Government before the 31 March 2022 deadline.

2. Background

- 2.1 The National Planning Framework (NPF) is a long-term spatial plan for Scotland. The current National Planning Framework (NPF3) and Scottish Planning Policy (SPP) were both published in 2014 and, aligned with the Scottish Government's programme of planning reform, work commenced to prepare Scotland's fourth National Planning Framework (NPF4) at the beginning of 2020.
- 2.2 NPF4 will look to 2045 and guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities. NPF4 will be different to NPF3. It will have increased status and be part of the statutory development plan, meaning that its policies will have a stronger role in day-to-day planning decision making. NPF4 will incorporate updated Scottish Planning Policy which will contain detailed national policy on a number of planning topics. For the first time, spatial and thematic planning policies will be addressed in one place.
- 2.3 During January to April 2020, the Scottish Government sought early views on NPF4 through a 'Call for Ideas', inviting stakeholders to consider Scotland in 2045 and reflecting on planning policy changes and national developments needed to get us there. In November 2020, Government published its Position Statement which reflected on the Call for Ideas and set out thinking on potential policy changes. Planning Committee approved North Ayrshire Council's input into this process at meetings in March 2020 and January 2021. In September 2020, Cabinet approved an indicative Regional Spatial Strategy prepared jointly by North, East and South Ayrshire Councils. Engagement with Scottish Government to take forward early thinking on the potential for Regional Spatial Strategies has provided the opportunity for the Scottish Government to factor in regional priorities into the draft NPF4 spatial strategy.
- 2.4 In November 2021, Draft NPF4 was laid in the Scottish Parliament. Alongside Parliamentary scrutiny of the draft, a public consultation to invite comments on the

content of the draft is open until 31 March 2022. Following the consultation and the end of the Parliamentary scrutiny process, Scottish Government will analyse the responses and produce a final NPF4. The final adoption date will depend on the approval of NPF4 by the Scottish Parliament.

Outline of Draft NPF4

- 2.5 The spatial strategy, 18 National Developments and 35 planning policies proposed by Draft NPF4 are consistent with the key themes of the framework which are tackling and adapting to climate change; restoring biodiversity loss; improving health and wellbeing; building a wellbeing economy and creating great places. The National Spatial Strategy sets out a shared vision where each part of Scotland can be planned and developed to create sustainable places where we reduce emissions and restore and better connect biodiversity; liveable places where we can live better, healthier lives; productive places where we have a greener, fairer and more inclusive wellbeing economy; and distinctive places where we recognise and work with our assets.
- 2.6 Supporting the spatial strategy are six overarching spatial principles of compact growth; local living; balance development; conserving and recycling assets; urban and rural synergy and just transition. Key elements of these principles include limiting urban expansion where brownfield, vacant and derelict land and buildings can be used more efficiently; promoting 20-minute neighbourhoods and local circular economies; creating opportunities for communities by actively transforming areas of decline and enabling more people to live and remain in rural and island areas.
- 2.7 This shared spatial strategy is to be taken forward in five action areas. North Ayrshire sits within the area of central urban transformation. NPF4 seeks significant changes to the densely populated central belt of Scotland to meet climate change commitments reflecting that urban communities hold the key to reducing emissions from the way we live our lives: decarbonising buildings and transport and tackle congestion; making more efficient use of existing land and buildings; connecting to renewable electricity and heat networks and creating more inclusive, greener and sustainable places. The nine actions identified for the central area of Scotland (including North Ayrshire) include growing a wellbeing economy and in this regard, the Ayrshire Growth Deal and Community Wealth Building programme to build economic resilience and address unemployment, poverty and inequality across Ayrshire, with town centres at the heart of communities is explicitly supported by Draft NPF4.
- 2.8 Draft NPF4 proposes national developments to support the delivery of the spatial strategy. National Developments are expected to act as exemplars of the place principle and placemaking approaches and be designed and progressed in a way which supports community wealth building. Designation as a National Development means that the principle of the development does not need to be agreed in later consenting processes, providing more certainty for communities, business and investors. Hunterston has been designated as one of 18 National Developments in total. Six of the National Developments are Scotland-wide relating to the digital fibre network; a national walking, cycling and wheeling network; facilities to support the Circular Economy and renewable electricity and transmission infrastructure. The Central Scotland Green Network, which extends to North Ayrshire, is also retained as a National Development.

- 2.9 Aligned with the creation of sustainable, liveable, productive and distinctive places, Draft NPF4 sets out 35 national planning policies. As NPF4 will form part of the Development Plan, these policies will apply in the consideration of development proposals in North Ayrshire. Overall, they seek to ensure a place-based approach is at the heart of creating a more sustainable and fairer Scotland where climate change and nature recovery are the primary guiding principles for all plans and decisions.
- 2.10 A key focus of planning reform is delivery, however, Draft NPF4 is not accompanied by detailed proposals for delivering the spatial strategy. Scottish Government intend to work with key partners including Scottish Government portfolios, the Infrastructure Delivery Group, the Scottish Futures Trust, local authorities, key agencies and others to work up a detailed delivery programme to accompany the final NPF4. Important elements of the Delivery Programme are identified as the alignment of resources and an infrastructure-first approach.
- 2.11 The overall aim and ambition of the draft NPF4; its future vision for 2045 and clear focus on sustainability, climate change, reaching Net Zero, biodiversity and placemaking is to be welcomed. Further detail and comments on matters considered to be of most relevance to North Ayrshire are set out below:

Key considerations for North Ayrshire

- 2.12 **Hunterston:** North Ayrshire Council, as set out in the Adopted Local Development Plan – alongside Scottish Enterprise and port owners Peels Ports – have promoted the designation of Hunterston as a National Development within the NPF4. As such, the proposal to identify the ‘Hunterston Strategic Asset’ is warmly welcomed. The national development designation supports the repurposing of Hunterston port as well as the adjacent former nuclear power station site with the location and infrastructure identified as offering potential for electricity generation from renewables, and a variety of commercial uses including port, research and development, aquaculture, the circular economy, in accordance with the recently approved Development Framework for the Hunterston PARC site.
- 2.13 Eight classes of development are listed in Draft NPF4 to support the redevelopment and reuse of existing strategic assets and land contributing to a net zero economy and support delivery of the spatial strategy by stimulating investment in the west of Scotland, potentially contributing to the wider aim of tackling inequalities. Development in the location within one or more of the classes of development described in Draft NPF4 and that would otherwise have been of a scale or type that is classified as ‘major’ by would be designated a national development.
- 2.14 The location of the ‘Hunterston Strategic Asset’ is defined in Draft NPF4 as “Hunterston Port and Hunterston A power station site” but the designation has not been mapped. Officers intend meet with Scottish Government officials to discuss the scope of the designation. Included within this will be the potential of Hunterston to support the Council’s strategic direction of development for the blue economy.
- 2.15 **Ardeer Peninsula:** Although not identified as a National Development, Draft NPF4 does recognise the Ardeer peninsula as a significant site for redevelopment of the wider Ayrshire area, in the context of the central urban transformation action area and the action to grow a wellbeing economy. Members will be aware that Ardeer is the location of a proposed fusion energy plant and has been shortlisted under the STEP

programme, with the UK Atomic Energy Authority (UKAEA) expected to make a recommendation on the preferred option later this year. The recognition of Ardeer as a significant regeneration opportunity within Draft NPF4 is positive. As intimated in LDP2, the environmental and infrastructure capacity of Ardeer will be assessed in the preparation of the next LDP.

- 2.16 **Community Wealth Building:** References to community wealth building throughout Draft NPF4 are welcomed. This includes Policy 5 that states development plans should address community wealth building priorities; spatial strategies should support community wealth building, address economic disadvantage and inequality; and provide added social value and that proposals for development within the categories of national developments and major developments should contribute to community wealth building objectives.
- 2.17 As a pioneer of Community Wealth Building in Scotland, North Ayrshire would emphasise that community wealth building provides the mechanisms required to address aspirations to change the way we work to meet net zero goals and tackle longstanding inequalities. As a relatively new concept for many, and to ensure it is effectively utilised, it is recommended that community wealth building is more embedded within NPF4 and explained clearly and in detail, with guidance on how it can be used to meet the collective vision of building sustainable, liveable, productive and sustainable places.
- 2.18 **Minimum All Tenure Housing Land Requirement (MATHLR):** The Planning (Scotland) Act, 2019 requires Scottish Ministers, in preparing the National Planning Framework to include 'targets for the use of land in different areas for Scotland for housing'. This has been addressed in Draft NPF4 by the establishment of a ten-year Minimum All Tenure Housing Land Requirement (MATHLR) for each planning authority. The MATHLR set for North Ayrshire in Annex B is 2950 homes. This is an acceptable, if not somewhat unambitious target for North Ayrshire. For comparison, LDP2 includes a Housing Supply Target for 2019-2029 of 4071 homes. Draft NPF4 seeks to achieve 'balanced development' across Scotland, creating opportunities for communities in areas of decline, and managing development more sustainably in areas of high demand. It is not clear how the MATHLRs will contribute to this aim.
- 2.19 **Arran and Cumbrae within NPF4:** As noted at paragraph 2.7, NPF4's National Spatial Strategy is to be taken forward in five action areas. North Ayrshire sits within the area of central urban transformation. While this supported for the mainland, it does not relate well to our islands, Arran and Cumbrae. The 'north west and coast innovation' action area is focused on making sustainable use of our coasts and islands to sustain communities and pioneer investment in the blue economy. Actions within this zone, defined as broadly comprises the island communities of Shetland, Orkney, the Western Isles, and parts of Highland and Argyll and Bute including the north and west mainland coastline, are creating carbon neutral coastal and island communities; support the blue and wellbeing economies; protecting and enhance blue and green infrastructure and strengthen resilience and decarbonise connectivity.
- 2.20 North Ayrshire Council are participating in an ambitious three-year Islands Recovery and Renewal Pilot in partnership with the Scottish Government and Highlands and Islands Enterprise to support an inclusive and green economic recovery and renewal of North Ayrshire's island communities in line with their unique needs. The pilot project is aligned to the delivery of the National Islands Plan and Community Wealth Building

principles. A key area of focus within the pilot is working in partnership with island communities, businesses, and wider stakeholders to develop and facilitate the delivery of 10-year island plans to maximise the potential of North Ayrshire's islands. In recognition of the significance of this pilot work, and the similar challenges and opportunities faced by Arran and Cumbrae as other Scottish islands, it is recommended that North Ayrshire island communities are included within the north west coastal innovation zone

- 2.21 **National Planning Policies:** Once adopted and part of the Development Plan, NPF4 – in particular the national planning policies – will be directly relevant in the assessment and determination of planning applications. As such, concern is expressed over the wording of these policies. Imprecise policies and those which lack strength – for example stating development 'should' rather than 'must' – may undermine the implantation of the NPF and the achievement of its aspirations, particularly in relation to climate change. Lengthy appeal cases and challenges to decision making would not be in the planning system's best interests.
- 2.22 **Resourcing the Planning System and Delivery:** Resourcing the planning system and the additional duties on local planning authorities – plus the delivery of plans – is brought into focus by the wide scope of the draft NPF4; there is a requirement to upskill planning departments to address a ranges of issues such as embedding an infrastructure-first approach and assessing proposal in the context of climate change, and for cross-service collaboration in the preparation and implementation of the NPF. As noted at paragraph 2.10, draft NPF is not accompanied by the Delivery Programme, which is disappointing. The need for clarity around funding of, e.g., infrastructure, is critical.
- 2.23 Officers continue to work through the significant content and detail presented within Draft NFP4 to prepare a cross-service response to the consultation to be submitted to Scottish Government before the 31 March 2022 deadline. The final adoption date of NPF4 will depend on approval by the Scottish Parliament, but Scottish Government are currently aiming to lay a finalised version for approval by summer 2022. Scotland's Fourth National Development Framework is a key part of the planning reform process and, as a national spatial strategy for Scotland to 2045, it is crucial to its aims, ambition and future vision that it is robust and deliverable.

3. Proposals

3.1 It is recommended that:

- 1) Comments set out in Paragraphs 2.12 to 2.23 form the basis of the Council's response to the consultation on Draft National Planning Framework 4
- 2) Delegated authority is granted to the Chief Planning Officer to complete and submit a full consultation response to the Scottish Government.

4. Implications/Socio-economic Duty

Financial

- 4.1 The Draft NPF4 introduces many areas requiring particular specialist skills and areas of expertise which will require additional funding for reskilling and upskilling or external expertise for a range of assessments.

Human Resources

- 4.2 As above.

Legal

- 4.3 Once adopted, National Planning Framework 4 will form part of the Development Plan for North Ayrshire. Decisions on planning applications and the next Local Development Plan will be required to accord with NPF4.

Equality/Socio-economic

- 4.4 A number of statutory and non-statutory assessments have informed the preparation of NPF4, and an Integrated Impact Assessment Report has been published alongside the draft NPF4. These include a Strategic Environmental Assessment and Society and Equalities Impact Assessment, incorporating an Equalities Impact Assessment (EQIA), including human rights considerations, Child Rights & Wellbeing Impact Assessment (CRWIA), Fairer Scotland Duty assessment (FSD) and Island Communities Impact Assessment.

Environmental and Sustainability

- 4.5 See above.

Key Priorities

- 4.6 NPF4 aligns with wider national priorities, programmes and strategies, including on infrastructure and economic investment. These align with many the Council's key priorities, including a sustainable environment; affordable, modern and well-designed homes; and effective infrastructure.

Community Wealth Building

- 4.7 The Draft NPF4 supports community wealth building approaches.

5. Consultation

- 5.1 Commencing in early 2020, the Scottish Government has undertaken a comprehensive engagement programme to inform the preparation of Draft NPF, including seeking views at 'Call for Ideas' and 'Position Statement' stages. Planning Committee approved North Ayrshire Council's input into this process at these stages. The indicative Regional Spatial Strategy prepared jointly by North, East and South Ayrshire Councils has also influenced the regional priorities reflected in the draft NPF4 spatial strategy.
- 5.2 This paper seeks delegated authority for the Chief Planning Officer to respond to the Scottish Government consultation on the draft of Scotland's fourth National Planning Framework. The consultation is open until 31 March 2022. Cross service input has

highlighted headline comments on the draft, set out in this report. To inform North Ayrshire's detailed response to the consultation, the Planning Service will continue to engage with other Services and consider the emerging views of other stakeholders in the planning system.

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For further information please contact **Alistair Gemmell, Strategic Planning Manager**, on **01294 324021**.

Background Papers

[Draft National Planning Framework 4 - Scottish Government - Citizen Space](#)