

National Planning Framework 4 (NPF4)

Response from the Landscape Institute

For: Scottish Government

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1. Background for members

The National Planning Framework (NPF) is a long-term plan for Scotland that sets out where development and infrastructure is needed. This fourth National Planning Framework (NPF4) is a long-term plan until 2045 that will guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities.

NPF4 will be different to the current planning framework (NPF3) and previous frameworks, in that it will be part of the statutory development plan, and as such its policies will have a stronger influence on day-to-day planning decisions across Scotland. NPF4 brings together spatial and planning policies into one place.

Scottish Government started work on NPF4 in 2020 and presented the draft version to Scottish Parliament in November 2021. In addition, there has been a public consultation to allow further scrutiny on its contents. The consultation on Draft NPF4 closed on 31 March 2022 and a final version of the framework will be published pending analysis of responses. This is currently anticipated to be approved by summer 2022.

2. Summary

We have commented on the specifics below. In summary:

- The policy changes to the NPF4 are – for the most part – extremely welcome. In particular, we strongly support the central role for sustainability in the NPF4, the ambition made to use planning to address the climate and biodiversity crises, and the role of green-blue infrastructure and nature-based solutions in delivering this
- We strongly support the Scottish Government’s stated ambition to address the climate change emergency and commit to the protection and regeneration of biodiversity as guiding principles for NPF4.
- We strongly support the support given to green-blue infrastructure and sustainable drainage (SuDS) by their designation as National Developments (1, 4, and relatedly, 2). However we believe that the ambition could be higher still, and that the whole of Scotland can benefit from these approaches.
- There is a need to refine the wording of the document in some areas and provide clear definitions. There are mixed terminologies around green-blue infrastructure, biodiversity enhancement, and nature-based solutions and this could create confusion. In some cases, the word ‘landscape’ would have served to provide greater clarity.
- None of these reforms will be successful without adequate resources and suitably qualified professionals to undertake them. There is currently a major skills shortage in landscape planning and design (and related professions) in the UK. There is an even more acute lack of these skills within many Local Planning Authorities. Serious consideration needs to be given to this issue in the near-term.

3. NPF4 consultation response

The consultation has been broadly structured into four parts, along with three annexes including an outcomes statement. The four key sections outline:

- A National Spatial Strategy for Scotland 2045
- National Developments
- National Planning Policy
- Delivering the Spatial Strategy

3.1 Part One: A National Spatial Strategy for Scotland 2045

This section gives a broad strategic overview of the long-term strategy for Scotland, working to achieve:

- Sustainable Places
- Liveable Places
- Productive Places
- Distinctive Places

Additionally, it sets out eleven key action areas for Scotland 2045, which focus on specific geographical projects and infrastructure developments.

Q1: Sustainable places - Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

The Landscape Institute agrees in general that this approach will support the move to future net zero places and is strongly supportive of the focus on climate change and biodiversity, and of the ambitions laid out in NPF4. The draft however lacks detail on delivery mechanisms and on how implementation will be managed in practical terms, with the use of subjective language and of the word “should” in policies, rather than tighter statutory requirements. We feel that more detailed guidance on regulations is required in order to translate ambitions into transformative change. There is more scope for recognition of landscape and the vital role that this plays in creating successful and liveable places for communities in Scotland, as well as contributing to sustainable development, addressing climate change and supporting the protection of biodiversity.

Q2: Liveable places- Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

The Landscape Institute are strongly supportive of this approach and of the ambition to work towards creating healthier and more vibrant places to live, however more detail is needed around implementation as this is not clear in the draft. There is overuse of the word “quality” without a clear definition or performance indicators of what this means in practice or how it will be assessed.

Q3: Productive places - Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

The Landscape Institute support this approach and that economic development designed within the context of environmental wellbeing has been put at the forefront of the planning process. It is important to recognise however that although planning has a vital role to play in sustainable economic development, there is a need for integrating the planning process across the wider scale of Scottish Government agendas and strategies. We note that there has been reference to the National Strategy for Economic Transformations, however better alignment is required in order to ensure that the economic agenda does not supersede environmental and landscape consideration, especially given the current political drive for economic recovery.

Q4: Distinctive places - Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

We support that the ambition of the approach and particularly that emphasis has been put on responding to the biodiversity crisis through nature recovery and the development of connected blue and green infrastructure. It is also positive to see that future development will

focus on vacant and derelict land and buildings which will contribute towards sustainable development goals, focus on regeneration rather than new developments and ensure that carbon emissions are minimised.

Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

The Landscape Institute support the overarching goals of the spatial strategy, particularly the focus on being nature positive, resource efficient, and the emphasis on blue and green infrastructure. As previously noted however, there is a need for further detail and better integration with wider Scottish Government policy areas and agendas. Planning decisions should be part of a wider systemic cultural change of which the climate crisis and protection of the environment is a central consideration. This cultural change also needs to be addressed by a robust community engagement strategy, particularly in areas of deprivation where environmental concerns can be further down the list of priorities due to other challenges being faced by communities.

Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

We generally support the principles of compact growth, local living, balanced development, conserving and recycling assets, urban and rural synergy, and just transition. However, it will be important to understand how the principles will interlink and how these will be applied in practical terms, as this is currently not clear. The spatial principles must be aligned alongside wider national agendas and policies, and statutory regulations and more information on delivery mechanisms must be included.

Q7 to Q17

The Landscape Institute do not have any specific responses to any of the eleven identified action areas.

Q18: What are your overall views on this proposed national spatial strategy?

We feel that the proposed strategy is generally positive and will play an important role in protecting biodiversity and supporting Scotland to achieve a net-zero and nature-positive future.

As noted in the responses above, stronger links to the wider policy agenda are needed, and the spatial strategy principles could be more strongly linked with the policy section of NPF4 itself. We would also welcome a high-level policy statement on landscape, for instance how decision-making affecting Scotland's landscapes take place in the context of the European Landscape Convention.

3.2 Part Two: National Developments

This section gives an overview of national developments, of national importance that have been designed to deliver Scottish Government's spatial strategy. Eighteen national developments

have been proposed, ranging from single large-scale projects or networks of smaller scale projects. Scottish Government has set these national developments out as exemplars of the place principle and placemaking approaches.

Although 18 national developments have been proposed, the Landscape Institute has chosen to focus on four key areas that are of most significance to the landscape sector. These are:

- 1. Central Green Scotland Network
- 2. National Walking, Cycling and Wheeling Network
- 4. Urban Sustainable Blue and Green Drainage Solutions
- 12. Strategic Renewable Electricity Generation and Transmission Infrastructure

Q19: Do you think that any of the classes of development described in the Statements of Need should be changed or additional classes added in order to deliver the national development described?

The Landscape Institute generally support national developments 1, 2, 4 and 12, specifically in terms of the recognition that has been given to the importance of green infrastructure and sustainable drainage systems (SuDS), both of which can contribute to sustainable development and improve the places and spaces where we live, work, and play. We do however feel that the planning of national developments could have been more ambitious, and it is disappointing that developments 1 and 4 have been limited to specific geographical areas. There is a strong argument that green infrastructure and sustainable drainage systems are required across Scotland to enable the country as whole to adapt to the effects of climate change and to react effectively to biodiversity loss.

1. Central Green Network

Where we strongly support the development across the central belt, it is however disappointing that this has been limited to central Scotland. The Landscape Institute feel that the ambition should be higher and that there is more scope to extend the development of the Central Scotland Green Network to be better interconnected with other towns and cities, particularly as NPF4 will guide planning policy until 2045. It should be specified how learning from this national development will be assessed and applied to other areas across the country to ensure an inclusive approach to planning which mitigates the impacts of climate change and biodiversity loss for all.

2. National Walking, Cycling and Wheeling Network

The Landscape Institute welcome the upgrading and provision of active travel across Scotland and the positive contribution that this will make in working towards Scotland's net zero targets by 2045. We would strongly suggest however that guidance is provided on protecting existing / surrounding landscape when making planning decisions on new road infrastructure.

4. Urban Sustainable Blue and Green Drainage Solutions

The Landscape Institute strongly welcome and support the development of sustainable drainage systems. Approaches to manage surface water that take account of water quantity, water quality, biodiversity and amenity will be vital in mitigating the effects of climate change and in ensuring that the places in which we live are protected and remain liveable over time. These systems should not be limited geographically and should be mandatory in planning decisions across Scotland, as the risk from inadequate water management systems is not contained within specific geographical boundaries.

12. Strategic Renewable Electricity Generation and Transmission Infrastructure

The Landscape Institute supports renewable energy generation and the expansion of the electricity grid with an eye to Scotland's net zero targets. Addressing the climate crisis must be the top-most agenda for future development.

However it is vital that landscape considerations and requirements are included within NPF4 and wider planning policy. Poorly planned on-shore renewable energy infrastructure can have devastating impacts on landscapes and these risks should be managed effectively. When considering the impact of new developments, it is often not the infrastructure itself that has a negative impact on the landscape, but rather the placement of junctions and cables, and the creation of access roads. Poorly designed systems can have negative effects on biodiversity, sometimes cutting habitats in half. The Landscape Institute strongly recommend that requirements on sitings as well as infrastructure are included in planning policy to ensure that one favourable policy environment doesn't negatively impact the other.

Q20: Is the level of information in the Statements of Need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

We have not been able to make a robust assessment of this in the timescale available. However, we would note the challenges inherent in precisely defining the parameters of green-blue infrastructure and sustainable drainage (SuDS) for the purposes of NDs 1 and 4. By way of example, some drainage schemes will incorporate a hybrid model of vegetated planting (i.e. SuDS) alongside traditional grey infrastructure (e.g. stormwater detention tanks).

We would welcome the opportunity to work with Scottish Government on further guidance and clarity in these areas.

Q21: Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

As noted in Q.19, there is scope for some of the national developments such as the expansion of green infrastructure and the development of sustainable drainage systems to be rolled out across Scotland and not limited to specific geographical boundaries.

3.3 Part Three: National Planning Policy

This section outlines a wide variety of policies that together provide the foundation for planning decisions in Scotland:

Universal Policy - Sustainable Places

Q22: Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

The Landscape Institute strongly supports this. Climate change and nature recovery must be central to plans and planning decisions. The landscape sector has a pivotal role to play in addressing the climate and biodiversity emergency by taking an integrated and holistic role in future planning, both in terms of climate mitigation and climate adaptation. We are pleased to see that NPF4 reflects the importance of taking a proactive and integrative approach to addressing these crises.

Policy 1 - Plan Led Approach to Sustainable Development

Q23: Do you agree with this policy approach?

The Landscape Institute supports a plan-led approach to sustainable development, and the specific reference to the UN Sustainable Development Goals. There may be some scope to strengthen this policy through the introduction of guidance however, as detail is missing as to how the requirements will be applied in practice and there is the potential for confusion. Some UN Sustainable Development Goals more logically apply to development proposals than others.

Policy 2 - Climate Emergency

Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

The Landscape Institute strongly supports the focus on minimising future emissions and the inclusion of contingency planning for infrastructure and places to ensure the future proofing of new developments in response to the effects of climate change.

Policy 3 - Nature Crisis

Q25: Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

The Landscape Institute strongly supports this policy.

However, we believe there is scope to take a stronger regulatory approach to addressing the nature crisis through a measurable approach to biodiversity net gain. It is encouraging that NPF4 will be the main mechanism for working towards the objectives of the Planning (Scotland) Act 2019, which includes 'securing positive effects for biodiversity', however it is not clear as to how this will be assessed, enforced or monitored over time.

Skills and resources remain the single greatest barrier to encouraging development which is 'nature-positive', particularly in landscape architecture – however there are initiatives underway to address this at a UK workforce level. We would welcome the opportunity to work with the Scottish Government on steps to address this in a more concrete way in Scotland.

Policy 4 - Human Rights and Equality

Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

The Landscape Institute support this policy and the collaborative approach that has been outlined in relation to planning. It would be useful if more detailed information was provided on the intended community engagement model, highlighting how the approach will ensure inclusivity and how community feedback will feed meaningfully into the planning process.

Policy 5 - Community Wealth Building

Q27: Do you agree that planning policy should support community wealth building, and does this policy deliver this?

The Landscape Institute support this policy and that Scottish Government are focusing on a people-centred approach to local economic development to address inequalities and to provide social value. There is much scope to include the five principles of progressive procurement, fair employment and just labour markets, shared ownership of the local economy, socially just use of land and property and making financial power work for local places. Given the investment of £5 billion to the City Region & Regional Growth Deals programme that is currently underway across Scotland, involving major infrastructure projects and a commitment to community wealth building, it would be useful if detail could be provided on how NPF4 will interact with these plans.

Policy 6 - Design, Quality and Place

Q28: Do you agree that this policy will enable the planning system to promote design, quality and place?

The Landscape Institute agree that this policy will enable the planning system to promote design, quality and place. The reference to the Six Qualities of Successful Places is useful and it would be helpful to include this definition into the document, highlighting the need for places to be distinctive, safe and pleasant, welcoming, adaptable, resource efficient, and easy to move around and beyond. A definition of what “Quality” means in relation to development is missing from this policy and would be useful to ensure that quality standards are applied consistently, rather than relying on a subjective approach to quality.

We would like to see reference made here, as elsewhere, to the importance of landscape character in defining the place-specific underpinning of any future design qualities (<https://www.nature.scot/professional-advice/landscape/landscape-character-assessment/landscape-character-assessment-scotland>)

Policy 7 - Local Living

Q29: Do you agree that this policy sufficiently addresses the need to support local living?

The Landscape Institute support this policy and its’ approach to create liveable places with access to local services and a reduced need to travel beyond local communities for day-to-day living. The Landscape Institute are strongly committed to addressing climate change and the concept of 20 minute neighbourhoods, if rolled out effectively, would contribute to sustainable living, supporting both net zero and climate change targets.

Policy 8 - Infrastructure First

Q30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

The Landscape Institute welcomes the infrastructure first approach to planning and agrees that it will lead to more sustainable development and contribute to achieving Scotland's net zero targets. We are pleased to see that local delivery plans will be linked to wider infrastructure plans and policies, such the Infrastructure Investment Plan and National Transport Strategy, which will strengthen the practical application of the policy. We would recommend that the policy is extended to include natural infrastructure in order to encourage investment in nature and recognition of the role that nature-based solutions and green infrastructure can play in addressing the impacts of climate change and biodiversity loss.

Policy 9 - Quality Homes

Q31: Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

The Landscape Institute generally agrees that this policy will meet the aims of supporting the delivery of high quality, sustainable homes. We are mindful however that housing targets should take account of local constraints including landscape designations, open space designations, flood zones etc..., this may need consideration in the context of the required density of developments linked to the 20-minute neighbourhood model. Housing targets should be high enough to meet need and to incentivise Local Planning Authorities to be ambitious, but should also protect existing landscapes and natural spaces.

Policy 10 - Sustainable Transport

Q32: Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

We support the aims of the policy in working towards more sustainable travel and decarbonisation of the transport system and welcome the requirement that spatial strategy should be based on evidence of an area's transport infrastructure capacity. We also support making best use of existing infrastructure and services, which should minimise disruption to landscapes and contribute to 20-minute neighbourhoods, although it is also positive to note the mention of incorporating blue and green infrastructure and nature rich habitats into the design of new transport infrastructure where it is required.

Policy 11 - Heat and Cooling

Q33: Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

The Landscape Institute have no comments on this policy.

Policy 12 - Blue and Green Infrastructure, Play and Sport

Q34: Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

We strongly welcome the ambitions of this policy, particularly the recognition of the benefits of blue and green infrastructure as an integral part of successful places, supporting wellbeing, climate resilience, flood risk and biodiversity etc... We agree that proposals should incorporate and enhance blue and green infrastructure and that plans should be multifunctional with connections to wider green networks, however more detail is needed on what this means and on how it will be implemented / enforced. While we strongly support this policy, there is also an opportunity to extend it beyond play and sport, including blue and green infrastructure an integral part of all planning decisions. We also feel it is important to highlight the breadth and level of skills that are required to successfully plan, design, implement and manage blue and green infrastructure; Landscape practitioners have an important and unique role to play in employing their skills to ensure the success of this ambition and serious consideration must also be given to the acute lack of skills within many Local Planning Authorities in the near term.

Policy 13 - Sustainable Flood Risk and Water Management

Q35: Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?

The Landscape Institute support this policy, and we welcome the positive words about blue-green infrastructure and the multifunctional benefits of sustainable drainage. SuDS done right have a number of benefits, beyond just flood water management.

Greater clarity should be set out in secondary legislation on the policy to "minimise the area of impermeable surface", and in particular whether this can be quantified or strengthened. SuDS enjoy a relatively strong regulatory framework in Scotland (compared internationally) but unsustainable and unsightly developments are still common and grey infrastructure is still in many cases the default. Proposals to make SuDS mandatory for all development are currently underway in England (ref: <https://consult.defra.gov.uk/water-industry/storm-overflows-discharge-reduction-plan/>) and this may be an opportunity to create a step-change in industry practice across the UK. We would like to see Scotland go further.

Planning Advice Note 61 is in need of updating, and the integration with design standards and placemaking made clearer.

Policies 14 and 15 - Health and Wellbeing / Safety

Q36: Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

The Landscape Institute support the health and well-being policy, particularly that proposals will not be supported where they have a significant negative effect on air quality or noise pollution, and that impact assessments will be required to assess this. We would suggest that the policy could go further in recognising and promoting the value of landscape in supporting health and well-being, particularly focusing on access to green spaces and natural habitats. We would encourage a review of landscape funding models to support investment in landscape as part of this health and well-being policy. We have no specific comments to make regarding policy 16, safety.

Policy 16 - Land and Premises for Business and Employment

Q37: Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy

We support this policy, particularly the linking of investment with the just transition to a net zero, nature-positive economy. We agree that the focus on community wealth building will strengthen the social and environmental value of future business investment. We also welcome that development proposals for business and industrial uses must consider environmental quality and air quality and should avoid impacts on surrounding areas (including the natural environment) in local development plans.

Policy 17 - Sustainable Tourism

Q38: Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

The Landscape Institute agree that this policy will support sustainable tourism and are pleased that this has been put into the context of net-zero nature commitments. In order to promote repeat tourism, it is important to highlight the need for high quality design of places, landscape and visual amenity, as well as urban green infrastructure. Also, it is vital that tourism developments are managed and assessed on a long-term basis to ensure that they continue to be environmentally sustainable. We note that in section C of the policy regarding developments in areas that are already pressurised, that proposals should only be supported if “satisfactory measures are put in place to alleviate existing pressures and prevent further adverse impacts”; It should be specified what these measures should be and how they will be assessed in order to protect communities and the natural landscape.

Policy 18 - Culture and Creativity

Q39: Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

We welcome this policy, particularly the emphasis on the value of creative and cultural use of space and that provisions for public art should be considered in the planning of new developments. We are also happy to see that the policy includes protection measures for existing cultural spaces and venues and that new development plans should demonstrate measures to ensure that noise and disturbance meets acceptable levels. We would like to highlight the value landscape, such as parks and gardens as cultural assets, as they are not currently included in this policy and play an important role in our cultural heritage.

Policy 19 - Green Energy

Q40: Do you agree that this policy will ensure our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045?

The Landscape Institute represent the views of landscape professionals in Scotland and across the UK and there are significant differences in the views of our members relating to the issues presented in this policy, as such although we strongly agree that resolving the climate emergency is tantamount and recognise the importance of renewable energy in doing so, we

are unable to adopt a specific position on this at present. We would however like to highlight the importance of a professional approach to landscape, including visual impact assessments (LVIA) to any mitigation, and see these as vital in protecting our landscapes and minimising the environmental impact of new developments. We would welcome the opportunity to contribute further on this point in future discussions.

Policy 20 - Zero Waste

Q41: Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

We support this policy, particularly that it supports the move towards a circular economy and emphasises the reuse of materials wherever possible. We would suggest that the language could be strengthened in this section, moving away from “should”, to providing more direct requirements.

Policy 21 - Aquaculture

Q42: Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment

The Landscape Institute has no comments to make on this policy.

Policy 22 - Minerals

Q43: Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

We support this policy and that a precautionary approach to mineral extraction is being proposed, with mention of the need to protect biodiversity, the natural environment, sensitive habitats, the historic environment, landscape and visual impacts.

Policy 23 - Digital Infrastructure

Q44: Do you agree that this policy ensures all of our places will be digitally connected?

The Landscape Institute generally support this policy and welcome the inclusion of part d) of the policy which states that telecommunications development should be supported when “the visual and amenity impact of the proposed development has been minimised through careful siting, design, and where appropriate landscaping”. We would propose that this condition is extended to all digital infrastructure in order to effectively protect our landscapes as this is rolled out across Scotland.

Policies 24 to 27 – Centres / Retail / Town First Assessment / Town Centre Living

Q45: Do you agree that these policies will ensure Scotland's places will support low-carbon urban living?

We support these policies and the principle of balanced development in moving towards low-carbon urban living. Achieving the right density and mix of development is vital but does not need to mean overly grey development and space should continue to be provided for urban greening. The urban heat island effect, particularly in a warming planet, means dense city

centres should include creative use of space for green infrastructure - This can take the shape of creating small spaces such as green roofs, walls and street trees, although parks and open spaces should also be included wherever appropriate. We are supportive of the creation of new services and amenities which are needed in order to successfully roll out the implementation of 20-minute neighbourhoods, however, would highlight the need to preserve existing greenspaces within town centres which are often already limited.

Policy 28 - Historic Assets and Places

Q46: Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings?

The Landscape Institute generally support this policy, however, would suggest that a reference is included to include the concept of landscape character. Although historic buildings are of vital importance and cultural significance, the broader character of historic places is reflected in heritage landscape assets such as designed parks and gardens, and the value of this should be acknowledged. The protection of conservation areas and other heritage sites is of vital importance and NPF4 should also set out measures to protect these areas where development takes place close to their boundaries.

Policy 29 - Urban Edges

Q47: Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

We support this policy and particularly the ambition of protecting Green Belt areas, which have great value both in natural and social capital. It has been noted that the list of exceptions to green belt protection in NPF4 is more extensive than that included in Scottish Planning Policy and more information is needed on the practical application of these policies to ensure that protective legislation is clear.

Policy 30 - Vacant and Derelict Land

Q48: Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

The Landscape Institute support the reuse of vacant and derelict land and properties and recognise the contribution this can make to achieving climate targets and in supporting biodiversity, health and wellbeing improvements and resilient communities. The emphasis on providing more greenspace and growing spaces is welcomed, particularly within dense urban areas where this provision is often limited.

Policy 31 - Rural Places

Q49: Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

We are generally supportive of this policy in ensuring that rural places can be vibrant and sustainable, however would welcome reference to how such development can be integrated with post-Common Agricultural Policy land management priorities. Given that development

proposals are relatively limited in rural areas, and the need to maximise the natural capital benefits from land use management, it would be useful for NPF4 to reference the importance of considering land management priorities, which may not necessarily be set out in statutory guidance. It is also important to highlight the key role that rural places can play in working towards net zero targets and in creating a nature positive society and economy.

Policy 32 - Natural Places

Q50: Do you agree that this policy will protect and restore natural places?

The Landscape Institute strongly support this policy and its role in protecting and restoring natural places. The policy states the ambition to actively support a national commitment to reverse biodiversity loss, and this could be further strengthened by adopting a biodiversity net gain approach, delivering positive effects for biodiversity from new developments and by securing and growing nature networks. This policy could go further to protect and enhance existing designated areas such as National Scenic areas, granting them greater planning powers and resources.

Policy 33 - Peat and Carbon Rich Soils

Q51: Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

We strongly welcome this policy and the recognition of the role that peat and carbon rich soils play in addressing climate change and in protecting biodiversity. However, the current language in the document requires strengthening.

Peatland restoration will be critical to deliver Scotland's net zero ambitions but the current drafting is not robust enough and allows too large a scope of potential development to take place. Furthermore, commercial peat extraction has several vague exemptions to 'support an industry of national importance to Scotland', this must be clarified to avoid loopholes.

This must be done in combination with demand-side activities to reduce the 'market pull' for commercial/retail peat extraction.

Policy 34 - Trees, Woodland and Forestry

Q52: Do you agree that this policy will expand woodland cover and protect existing woodland?

The Landscape Institute support this policy and the protections that it will give to expand and protect existing woodland. The increased recognition of irreplaceable habitats and measures outlined for the protection of ancient woodland are welcome.

Additional proposals are needed to deliver greater urban tree numbers, where their impact will be felt most by the public. There is also very robust evidence of the critical importance of trees in creating climate-resilient towns and cities, in enabling an increased uptake of sustainable travel, as well as in enhancing quality of place around both existing and new homes (making higher densities more liveable, and new homes more acceptable).

Requiring all local authorities to create and adopt a localised tree strategy could be an important step change that could radically increase the delivery of urban and rural planting.

Protecting and enhancing woodlands will require greater resourcing and it is vital that local authorities are equipped with landscape professionals and arboriculture officers that can ensure the right tree goes in the right place and that they are maintained.

Policy 35 - Coasts

Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

We broadly agree with proposals outlined. Development proposals in coastal locations should also make specific reference and be informed by Coastal Character Assessments as outlined by [Nature Scot](#). The proposed policy should therefore make reference to Coastal Character Assessments and Scotland's National Marine Plan.

3.4 Part Four: Delivery

Scottish Government has outlined its approach through identifying the key delivery mechanisms that will underpin this. These mechanisms focus on:

- Aligning resources
- Infrastructure First
- Delivery of National Developments
- Development Plan Policy and Regional Spatial Strategies

Q54: Do you agree with our proposed priorities for the delivery of the spatial strategy?

Aligning resources

The Landscape Institute supports the collaborative approach outlined as central to delivering the spatial strategy including the use of the Place Principle.

Infrastructure first

We welcome the proposals which put infrastructure considerations at the heart of place making. The LI would welcome greater reference to how green and blue infrastructure can inform future development plan spatial strategies. It is also important for consideration to be given to how infrastructure will be maintained rather than a pure focus on up-front delivery. We hope that the forthcoming Infrastructure Investment Plan will also recognise the crucial role of green and blue infrastructure.

Development Plan Policy and Regional Spatial Strategies

The LI welcomes the aim to work together with key partners and align public and private sector investment in supporting delivery. With Local Place Plans highlighted as one of the key delivery mechanisms it is vital that the ambitions within published LPPs are met and that they are valued within Local Development Plans.

Planning obligations could play a key role in placemaking and ensuring the delivery of community infrastructure. We encourage the Scottish Government to ensure that any potential infrastructure levy supports the provision of vital community infrastructure, including open space, green infrastructure, sustainable drainage, etc. and is not used to backfill items such as under-provision of affordable housing.

Noting the current system of Community Infrastructure Levy (CIL) in England has been maligned for its complexity, any system that the Scottish government bring forward must be simplified and not overly burdensome. Fundamentally the critical issue with any levy is the amount of capital provided, this must be sufficient, target its original purpose (community infrastructure for placemaking) and be fair. Potential problems exist where unattractive development areas are further hampered by low levy income.

Recognition that planning authorities need to be better resourced is welcome. The outline measures may support the authorities financially but there is also a noted skill drain on departments particularly in terms of placemaking and landscape skills. Scottish Government should look to work with professional bodies to provide training, skills and people to enhance department's capabilities to support this ambitious agenda.

Monitoring

Measuring planning performance with the current metrics outlined only captures a small part of the overall delivery picture. Instead of a focus on how quickly planning caseloads are processed there needs to be a broader set of measures focused on delivery quality. This could be managed by setting short-, medium- and long-term targets that are monitored by an advisory group. This could include broader metrics capturing progress on placemaking, environmental and socio-economic development and alleviation of deprivation.

Q55: Do you have any other comments on the delivery of the spatial strategy?

It is noted that much of the spatial strategy has not been supported by a clear capital investment framework and we would suggest that this is needed to ensure the ambitions outlined in the spatial strategy are realised. Clear guidance and reference to relevant methodologies and wider government plans and policies such as Designing Streets (2010) and Town Centre and Retailing Methodologies (2007) will also be required to support the practical delivery of this framework.

3.5 Part 5: Annexes

Q56: Annex A. Do you agree that the development measures identified will contribute to each of the outcomes identified in section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

The Landscape Institute have no comments on Annex A.

Q57: Annex B. Annex B. Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?

The Landscape Institute have no comments on Annex B.

Q58: Annex C. Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

The list of green features should be included in the definition of “green infrastructure and we also recommend inclusion of The European Landscape Convention and the 5 Principles: All landscapes, shared landscapes, your landscapes, understanding landscapes and dynamic landscapes.

4. Who we are

The Landscape Institute (LI) is the royal chartered body for the landscape profession. We represent over 5500 landscape architects, landscape planners, urban designers, and landscape and parks managers.

As a professional organisation and educational charity, we provide training, accreditation, technical advice, and standards to maintain the high quality of the landscape profession across England, Scotland and Wales. We protect and enhance the built and natural environment for the public benefit.