

Scotland's Fourth National Planning Framework Position Statement



Consultation Response from:

Green Action Trust

February 2021

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1. INTRODUCTION

This Consultation Response presents the Green Action Trust's response to the Scottish Government's call for comments on the Position Statement. We note that our earlier feedback to the Call for Ideas is still current and in use by the development team. We have, therefore, avoided repeating any of this feedback except where it helps to set the context for, or to emphasise the importance of, responses in this paper.

The paper:

1. Responds to the specific questions posed in the Position Statement
2. Comments more generally on the content of the Position Statement – especially the sections on Potential Policy Changes and Delivery
3. Highlights areas where the Green Action Trust, through its staff, may be able to assist Scottish Government colleagues

2. THE GREEN ACTION TRUST

The Green Action Trust (formerly the Central Scotland Green Network Trust) is the trusted delivery partner focussed on environmental and regeneration outcomes for Scotland. The Trust works with private, public and third sector partners across Scotland to turn ideas into tangible change, to build more sustainable communities and a greener country. Our work is aligned with delivery of Scotland's National Outcomes and the UN Sustainable Development Goals.

The Trust plans, collaborates and delivers positive action across the country to achieve Scotland's climate change ambitions and identifies and delivers opportunities for improving greenspaces in both urban and rural settings. The Green Action Trust is specifically responsible for coordinating the delivery of the Central Scotland Green Network, the largest green infrastructure project of its kind in Europe.

Our Vision

An environmentally just and climate resilient Scotland where communities flourish and the economy prospers.

Our Mission

Our ambition is to enable and deliver an environment which: adapts to our future climate; enhances and restores nature and biodiversity; fosters healthy lifestyles and wellbeing; and supports a sustainable economy. We will achieve this by influencing our partners, and by working collaboratively to deliver projects and services that build equitable, resilient communities and a greener country.

Our Values

Collaborative
Ambitious
Influential
Trusted
Leader

3. RESPONSE TO QUESTIONS POSED IN THE POSITION STATEMENT

1. Do you agree with our current thinking on planning for net-zero emissions?

We strongly support the Scottish Government's commitment to achieving net-zero emissions. We are particularly reassured to see the headline reference to building on natural solutions. We would stress the importance of nature based climate solutions (both mitigation and adaptation) and the need to build these into wider networks of green and blue infrastructure. which will deliver impacts and benefits across all the Government's priorities. The role of Regional Spatial Strategies (and Regional Land Use Frameworks) is crucial in this regard.

We also agree that Active Travel must play a key role in transport decision making. We would further highlight the importance of new and existing cycling/walking/wheeling infrastructure being climate resilient and the opportunities for routes and access networks to be greened as part of wider green networks. This will reduce the impact of climate on infrastructure and will encourage greater use of routes and networks. Our work to develop the Central Scotland Green Network Blueprint and our work with Sustrans to develop the concept of Greenways will contribute to this ambition.

The inclusion of natural and micro-climate features in the discussion of design solutions and the wider commitment to nature based solutions and natural infrastructure are encouraging but we are concerned that, without a degree of prescription in relation to these solutions, these innovations and features are often 'negotiated out' of developments (see section 4 for more on this).

We would also stress the need to cross-reference renewable energy and green/natural infrastructure requirements - this should include:

- maximising blue-green infrastructure on renewable energy development sites
- including positive action on biodiversity within the requirements/expectations of renewable developments
- including renewables (where appropriate) in blue-green infrastructure

2. Do you agree with our current thinking on planning for resilient communities

We welcome the strong focus on place-based solutions and the explicit reference to promoting blue and green networks which are multi-functional and we are particularly pleased to see the recognition that management/maintenance of natural infrastructure is essential. We are keen to work with the Scottish Government to develop the potential for embedding climate action and biodiversity into our towns and other settlements.

We believe that the concept of 20 Minute Neighbourhoods is an important development which aligns well with international practice and offers real opportunities to increase the resilience of Scotland's communities. We would highlight the need for the 'fabric' of these neighbourhoods to be high quality and multifunctional – neighbourhood of short distances but poor environmental quality will not succeed.

The key components of a 20 Minute Neighbourhood (i.e. residential / health / education / recreation / open space / transport nodes etc). need to be interconnected through green active travel routes and green streets and spaces. The inclusion of natural infrastructure (including flood risk management) within these neighbourhoods will increase their attractiveness, functionality and the resilience of communities in the face of climate change.

Policy changes should reflect the Scottish Government's Policy Framework on Water-Resilient Places, in particular the vision for Scotland to thrive because it is water resilient. Recommendations in the framework include a Blue-Green Infrastructure first approach in placemaking and master-planning, Blue-Green Infrastructure only in new developments, and a priority to retro-fit existing developments with Blue-Green solutions. We see NPF4 as having a major role in delivering these ambitions, and as they fit well with our priorities around climate change adaptation and the 10,000 Raingardens for Scotland initiative, we are very supportive of the approach.

However, as mentioned in response to question 1, experience shows that greenspace and natural infrastructure proposals are often watered down or negotiated out of developments and the work put into developing high quality plans does not carry through to delivery on the ground. To reduce the risk of this happening, we would argue for natural infrastructure, blue and green networks etc. to be requirements of all developments (must rather than should).

Depending on the place requirements and the nature of the development, this could cover everything from on-site raingardens to guaranteed developer contributions to landscape-scale networks. We would argue that tools are needed to ensure that natural infrastructure isn't impeded by viability concerns and that its value has weight in decision making.

We would also recommend that all key terms are clearly defined and described to avoid confusion and to reduce the chances of 'under delivery'. By this we mean the occasions when high quality multi-functional green infrastructure in a masterplan becomes low quality single function (or functionless) greenspace on the ground.

3. Do you agree with our current thinking on planning for a wellbeing economy?

All of our work is built around the recognised need for environmental action to contribute to delivering healthier, fairer and more prosperous places. Environmental equality and inclusion go hand in hand. We are reassured to see the strong focus on wellbeing and inclusion within the Position Statement and the recognition that investment must be guided by a place-based approach.

The Scottish Government's commitment to a green recovery is an important step and we are keen to see that this progresses in a way which creates green, sustainable and inclusive places.

We are concerned that the clear commitment to enhancing and benefiting from Scotland's natural capital that is contained in the narrative of this section does not read across into the Potential Policy Changes which have been identified. Even where it does, there is a need for greater clarity. For example, when referring to the expansion of tourism and associated infrastructure, it is important that the concept of 'sustainable' is fully explained and that it clearly includes natural capital, net-zero and climate resilience components not just economic sustainability.

4. Do you agree with our current thinking on planning for better, greener places?

This is the area of the Scottish Government's (S.G.) Position Statement that has the greatest overlap with the Trust's priorities and activities. Accordingly, we have listed (and commented on) what we consider are the key Potential Policy Changes below.

S.G. Statement

Promoting the value of good design in creating great places. We will continue to reflect the 6 principles of successful places and consider the extent to which they can be developed further to reflect wider priorities, such as climate change, biodiversity and public health, including the health benefits from clean air and access to nature and quality green space. We will also consider scope to provide a framework for bringing forward Masterplan Consent Areas within this context.

Trust Response

We strongly support a review of the principles of successful places and would suggest that this is cross-referenced with the work that has been done on including climate and environmental action in the Town Centres Action Plan. Functional/successful places are ones that have good walking/wheeling/cycling infrastructure and multifunctional natural infrastructure. We also welcome the suggestion that Masterplan Consent Areas should have a framework which clearly and explicitly covers the role of place in delivering on climate, biodiversity and wellbeing.

S.G. Statement

Embedding the use of the Place Standard Tool to reflect the importance of public involvement in a collaborative approach to place-making and the links between place, environment, health and wellbeing.

Trust Response

We would like to see the Place Standard Tool (and the thinking behind it) used more widely and the application of the Place Principle applied to more strategic-scale decisions and plans (for example land use planning and investment decisions)

S.G. Statement

Prioritising the use of vacant and derelict land ahead of greenfield land through a 'brownfield first' approach. As part of this, we will consider the various definitions of vacant and derelict land, buildings at risk and their respective implications for planning policies.

Strongly incentivising the imaginative and sustainable re-use of vacant and derelict land and buildings by highlighting the wide range of potential temporary and permanent uses it could support and providing a positive policy framework for achieving long term positive outcomes.

Trust Response

We strongly support the incentivising of re-use of VDL but we are concerned that these two statements do not clearly recognise the importance of natural infrastructure end uses nor of greening as a means of 'unlocking' wider regeneration. The developments in North Glasgow including Sighthill are excellent examples of green uses being part of an infrastructure first approach to VDL and regeneration.

Some VDL have a significant level of biodiversity value and, with minimal intervention, could be valuable natural infrastructure and valued community spaces, this should be recognised and included in any assessment of options and priorities.

The greening of vacant and derelict land can play an important role in supporting Community Wealth Building through enhanced placemaking and through creating new opportunities for community action and enterprise.

S.G. Statement

Updating our green belt policy to provide greater clarity on acceptable uses whilst also recognising its role as part of multifunctional natural infrastructure.

Trust Response

We would argue that current green belts (and by extension current green belt policy) do little to qualify them as multifunctional natural infrastructure. Accordingly, we believe that updated green belt policy must identify and prioritise the infrastructure functions that we expect green belts to contribute to. Simply controlling urban expansion is not sufficient to qualify as natural infrastructure. We should be looking at carbon sequestration through woodland creation and soil conservation; green active travel; natural flood and surface water management; biodiversity enhancement and increasing access to nature; connectivity to wider green and blue networks etc.

S.G. Statement

Strengthening the links between development proposals and wider sustainable land use objectives, contributing to the outcomes of Scotland's Environment Strategy. This includes reframing policy to reflect the fundamental role of our natural environment and biodiversity in providing essential natural services and benefits for our economy, health and wellbeing, and climate resilience. We will explore opportunities to ensure that our approach to using and managing natural assets is sustainable and regenerative, restoring and enhancing our stocks of natural capital.

Trust Response

This is the key section of the Position Statement and will be essential if the Planning System is to play its part in delivering a successful, sustainable future for Scotland. This fundamentally challenges the status quo but there is considerable inertia in the current system (despite there

being widespread recognition that it is not fit for purpose). Creating this shift in thinking will require strong and clear policy at a national level and the systems, structures and guidance to embed new mindsets and approaches at all levels. It also requires resources and capacity to manage the change in perceived priorities.

S.G. Statement

Strengthening the consideration given to the likely effects of development on carbon dioxide (CO₂) emissions where peat and other carbon rich soils are present. Securing positive effects for biodiversity from new developments. We are developing ambitious new proposals which deliver positive outcomes for biodiversity from development without the need for overly complex metrics and will consider how they can support wider approaches to natural infrastructure.

Strengthening policy on woodland protection and creation in association with development, aligned with new provisions on forestry and woodland strategies.

Trust Response

We strongly welcome these proposals but would again stress that, if we are expecting development to deliver biodiversity and woodland improvements, then we should be requiring these as a non-negotiable component of developments and we need to be prescriptive about what is needed. We would also suggest that this includes ongoing management and maintenance of natural infrastructure (as referenced in Resilient Communities). Guidance on forestry and woodland strategies will be needed to ensure a balance between different types of woodland (timber, carbon, biodiversity, recreational). This will need to read across to both the spatial framework and land use plans to ensure that competition with other land uses including renewable energy development and landscape considerations. We need to apply the Place Principle to land use decision making and management.

5. Do you have further suggestions on how we can deliver our strategy?

We broadly support the proposed approaches and, in particular:

- the use of the Place Principle to deliver better outcomes
- the strengthening of links between NPF4, infrastructure investment, transport planning and land use planning
- the development of effective regional spatial strategies and community scale planning to give spatial planning at all scales from national to local
- the adoption of an infrastructure-first approach

We consider, however, that there is still significant work to be done around developing the status and understanding of natural infrastructure within the overall category of infrastructure. In particular, we need to fully explore and explain the concept of nationally strategic natural infrastructure and develop clear links between national, regional and local priorities and requirements.

It is important that NPF4 contains not only the necessary policy but also that it moves key concepts such as the 20 minute neighbourhood from principle to practice. Guidance on how Planning Authorities can make these changes will be essential.

6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

Nothing substantive to add

7. Do you have any other comments on the content of the Position Statement?

See section 4 below.

4. FEEDBACK ON PROPOSALS

General perspective

We are supportive of the overall direction and ambition outlined in the Position Statement. We particularly welcome the presence of natural capital, natural infrastructure and blue green networks throughout the document – reflecting the importance and value of multifunctional natural infrastructure. We also welcome the strong focus on place and the creation of 20 Minute Neighbourhoods.

We note, however, that it is still a fairly general and high level document and the practical impact of NPF4 will depend on the detail of policy, guidance and the support available for the Planning System. None of this detail is available yet.

We need the Scottish Planning Policy component of NPF4 to have strong and explicit policies on green networks and natural infrastructure coupled with clear guidance on how this policy should be interpreted and applied - particularly in relation to the weight afforded to natural infrastructure in decision making.

These policies should be based on the model policy work commissioned by Scottish Government and the Green Action Trust (in its former guise of the Central Scotland Green Network Trust) but this will need to be updated to better reflect Scotland's commitments to climate action, biodiversity and a green recovery. Policy will also need to relate to the regional and community scales of planning which are now part of the system.

Biodiversity action as required by the NPF and Local Development Plans, must align with national and local priorities as articulated in the Scottish Government's Biodiversity Strategy, post 2020 Statement of Intent, Local Biodiversity Action Plans and the Central Scotland Green Network Blueprint (for example). Biodiversity enhancement and action should be considered at all scales from onsite to landscapes and wider networks.

For policy to translate into effective action, we will need to see a shift from the current development planning priorities to those outlined in the Position Statement. For the natural capital/natural infrastructure commitments to be realised, there will need to be much greater prescription to ensure that 'green' solutions are not marginalised or negotiated out in favour of what are perceived to be competing objectives. The areas of policy we feel most need to be prescribed are: the inclusion of natural infrastructure in new developments; securing positive effects for biodiversity and using an infrastructure first approach which includes natural infrastructure.

Where the retrofitting of green infrastructure is proposed to support the regeneration of established communities, the delivery of demonstrable place-making outcomes should be given the highest priority in decision making.

It is also important that the proposed policy changes are properly resourced. Many of the most important commitments - e.g. infrastructure first approaches and brownfield led regeneration - will have additional resourcing needs which need to be 'front loaded' but which can then be recouped later in the development process. New approaches to funding services will be needed - especially in the short term as new ways of working are introduced.

We consider it is necessary to highlight the importance of tackling inequalities in all action generated by the NPF. We know our poorest, most deprived communities live in the worst (environmentally

speaking) places so NPF4 and other relevant policies and programmes should be clear about how they will contribute and drive up the quality of our poorest communities. We know from evidence/experience that if this isn't made explicit what happens is that the more affluent communities tend to prosper more and thus inequalities are widened so explicit requirements and guidance are needed.

The case for the Central Scotland Green Network

We would also like to restate the case for the Central Scotland Green Network retaining its National Development status. The CSGN was established as a National Development - initially in NPF2 - with a vision that *'By 2050, Central Scotland has been transformed into a place where the environment adds value to the economy and where people's lives are enriched by its quality.'*

This focus on Central Scotland reflects:

- 1. Levels of population and economic activity across Central Scotland (3.8million residents and 68% of Scotland's Gross Value Added)**
- 2. Concentrations of disadvantage in communities across Central Scotland (87% of Scotland's 15% most deprived datazones are in the CSGN area)**
- 3. The environmental and social legacy of heavy industry across the area which has left a degraded landscape (78% of Scotland's vacant and derelict land lies within the CSGN)**

These factors combine to make the CSGN a clear, and continuing, national priority which delivers benefits for the whole of Scotland. From its inception, the CSGN has been designed to deliver against the four outcomes prioritised in NPF4. The new 10 year delivery plan for the CSGN is structured around the four outcomes presented across four workstreams:

- **Natural Climate Solutions**
- **Placemaking**
- **Health and Wellbeing**
- **Green Recovery**

We would suggest that the geography of the CSGN is reviewed to maximise alignment with Regional Spatial Strategies and Local Development Plans and to increase synergies in delivery. For example, Fife is currently only partially within the CSGN because of the old SESPlan/TayPlan boundary. This can make working strategically with the Local Authority more complicated.

Finally, we refer several times to the need for clear definitions of key terms and concepts. These need to ensure that planning ambitions are not undermined by poor delivery but also need enough flexibility to allow local placemaking priorities to be met and need to show how concepts can be delivered.

Key terms that we see as needing clearer definitions are:

- 20 Minute Neighbourhood
- Nature based solutions
- Natural infrastructure
- Infrastructure first
- Blue and green networks
- Sustainable (this may be more about ensuring that the word is used consistently)

5. DEVELOPMENT OF THE NATIONAL PLANNING FRAMEWORK

The Green Action Trust is already a trusted partner of Scottish Government in relation to the delivery of the Central Scotland Green Network and is contributing to the working group on Securing Positive Effects for Biodiversity. In addition to this, we would like to offer our expertise to assist with the development of the detail of NPF4.

This could include, but is not limited to, input into:

- Defining key terms relating to natural capital, natural infrastructure, blue green networks etc.
- Policy and guidance development relating to:
 - Review of the 6 principles of successful places
 - Updating the 2018 Green Infrastructure Policy Exemplars to include more on climate emergency, ecological crisis and green recovery (note: we are already involved in the working group on biodiversity)
 - Natural infrastructure and VDL/brownfield
 - Developing Green Belts as components of wider natural infrastructure
 - Securing biodiversity benefits from new developments
 - Woodland creation, protection and management
- Development of RSS guidance relating to green networks and natural infrastructure

The Trust would be pleased to discuss it can help Scottish Government to complete the development and implementation of NPF4.

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The Green Action Trust has charitable status and is a registered SCIO No. SC015341 and is regulated by the Scottish Charity Regulator (OSCR).

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