



**OFFICIAL REPORT**  
AITHISG OIFIGEIL

# Local Government, Housing and Planning Committee

**Tuesday 22 February 2022**

**Session 6**



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**LOCAL GOVERNMENT, HOUSING AND PLANNING COMMITTEE**  
**6<sup>th</sup> Meeting 2022, Session 6**

**CONVENER**

\*Ariane Burgess (Highlands and Islands) (Green)

**DEPUTY CONVENER**

\*Willie Coffey (Kilmarnock and Irvine Valley) (SNP)

**COMMITTEE MEMBERS**

\*Miles Briggs (Lothian) (Con)

\*Graeme Dey (Angus South) (SNP)

\*Meghan Gallacher (Central Scotland) (Con)

\*Mark Griffin (Central Scotland) (Lab)

\*Paul McLennan (East Lothian) (SNP)

\*attended

**THE FOLLOWING ALSO PARTICIPATED:**

Tom Arthur (Minister for Public Finance, Planning and Community Wealth)

Andy Kinnaird (Scottish Government)

Fiona Simpson (Scottish Government)

Helen Wood (Scottish Government)

**CLERK TO THE COMMITTEE**

Euan Donald

**LOCATION**

The David Livingstone Room (CR6)



# Scottish Parliament

## Local Government, Housing and Planning Committee

Tuesday 22 February 2022

*[The Convener opened the meeting at 10:00]*

### National Planning Framework 4

**The Convener (Ariane Burgess):** Good morning, and welcome to the sixth meeting in 2022 of the Local Government, Housing and Planning Committee. I ask all members and witnesses to ensure that their mobile phones are in silent mode, and that all notifications are turned off during the meeting.

We have two items on our agenda, both of which relate to the fourth national planning framework. First, we will hold our final evidence session in the inquiry with the Minister for Public Finance, Planning and Community Wealth, Tom Arthur, then we will go into private session to consider the issues that have been raised in evidence.

Mr Arthur is joined by Scottish Government officials. Fiona Simpson is the chief planner, Andy Kinnaird is the head of planning transformation and Helen Wood, who is joining us online, is the head of planning performance. I would be grateful if Mr Arthur could, in order to allow our broadcasting team to activate her microphone, make it clear when he wishes to bring in Ms Wood to respond to specific questions. I welcome Mr Arthur and his officials to the meeting.

I intend to allow up to 90 minutes for this session. Before I invite the minister to make opening remarks, I place on the record the committee's thanks to everyone who has helped to inform this important piece of work. In particular, I thank SURF—Scotland's Regeneration Forum, the Built Environment Forum Scotland, Rural Housing Scotland, Scottish Rural Action, Voluntary Health Scotland, Scotland's Towns Partnership and the Scottish Youth Parliament, all of which provided invaluable input to our scrutiny. I know that members particularly enjoyed the visits and online workshops, which really helped us to understand the ways in which planning impacts on communities and the importance of getting the planning framework right. I thank everyone who has assisted our work on the topic.

Before I open up to questions from the committee, I invite the minister to make a short opening statement.

**The Minister for Public Finance, Planning and Community Wealth (Tom Arthur):** Thank you very much, convener, and good morning, committee.

I echo the convener's thanks to everyone who has, to date, contributed to the process of getting the draft NPF4 to where it is, and I thank all those who are participating in the vital scrutiny work that is under way, and which will continue as we move towards the close of the public consultation at the end of next month.

I am very pleased to be here to talk about what will be an important document for shaping the future of the Scotland that we want to live in. I said when we laid the draft NPF4 last November that it signalled a turning point for planning. We are facing some major challenges across our communities and as a global society; we need to stand up to them.

In the draft NPF4, we advocate a change of direction in how we plan our places, through putting climate and nature, a wellbeing economy and Covid recovery at the heart of the new planning system. We know how much planning matters to people, and we understand the really important and positive role that it can have in facilitating the development of good-quality places that help our communities to thrive. However, strong leadership will be needed in order for planning to fulfil its potential and negotiate that turning point.

NPF4 will need to be approved by the Scottish Parliament and adopted by the Scottish Government. That can give it real strength of purpose. I want us to work together to share the vision for Scotland on its journey to net zero by 2045, and to make NPF4 the very best that it can be.

I am conscious that the committee has heard a lot of interesting and quite detailed evidence from a range of witnesses over recent weeks, and in its earlier call for views, so I would like to take a few moments to share some general thoughts, in advance of the committee's questions.

The committee has already heard from the chief planner about the wealth of engagement that has helped us to develop NPF4 to this point. We have done that using a genuinely collaborative approach. We have welcomed the considered input from many people, and we are continuing that collaboration in how we engage on the draft framework.

I am heartened that much of the feedback gives broad support for the direction that we have proposed for NPF4—the need to focus on climate and nature and on Covid recovery, and to think differently about our places.

We are hearing requests that we revisit the drafting and get the detail right, including calls for much more precise definitions and specific wording to be added. We need to ensure that NPF4 provides a sound and reliable basis for decision making, so I will listen to what people are saying and what they are offering as drafting suggestions, and I will work with my officials to ensure that we get it right.

I believe that we should have confidence in our planning system and in planners to apply their skills and expertise and to do the right thing in the long-term public interest. Choices and decisions that are made in planning are often not straightforward, and they are certainly not a tick-box exercise. Planning policies need to be read in the round; planning involves weighing up many matters and reaching balanced and reasoned judgments. That is what planners are good at, and their skills are needed now more than ever.

Some questions have been raised about the national spatial strategy, including the boundaries and priorities in the five action areas. The draft NPF4 acknowledges that

“Each part of Scotland can make a unique contribution to building a better future.”

That is about the big picture and a vision of our country as a whole, although we have to bear it in mind that spatial issues do not neatly follow administrative boundaries.

We have worked collaboratively with planning authorities to understand regional priorities, particularly through their work on indicative regional spatial strategies. Ideally, we want to foster a shared vision that people can easily relate to, and to understand the priorities in the different parts of Scotland. We can look again at the action areas and at the relationship between the national spatial strategy and the policy handbook in order to further consider and clarify their respective roles in decision making.

There have been requests that there be, throughout the NPF, explicit name checking of, and cross-referencing to, other policy documents, but it is important to bear it in mind that the NPF is a long-term strategy that will have a statutory role in decision making, so we must be careful not to cross-refer to a range of documents that might not have the same lifespan, thereby causing policies to become outdated. That risks causing confusion and uncertainty. I can assure the committee that we are strongly aligned with other policies and strategies—for example, the strategic transport projects review 2, “Housing to 2040”, place-based approaches and our land-use strategy, to name but a few.

We will continue to collaborate on the drafting of NPF4, while bearing in mind the fact that views

may vary on points of detail. We will also think about where additional guidance can help to deliver the intentions in NPF4. Some of that is already in progress: for example, the guidance for preparing local development plans—on which we are also consulting—and for biodiversity and greenhouse gas emissions assessments.

Some stakeholders have been calling for a capital plan, as the committee has heard. NPF4 is not a spending document, nor does it need to be. It will be delivered by a broad range of partners, public and private, so delivery will need to align with wider plans and programmes, rather than itself being a single programme for capital investment. When it is finalised, NPF4 will come together with STPR2 to guide the next infrastructure investment plan. The Scottish Futures Trust is working with us to develop a shared delivery programme for the final version of NPF4. The delivery programme needs to be agile and to be built up over time, rather than being a fixed and static document.

I know that there have been concerns about resources in planning services. I recognise those concerns, so I have been working with the high-level group on planning performance on how we can position and empower planning services to confidently lead the change that is needed for our places.

The committee will be aware that, earlier this month, I laid regulations that substantially increase planning application fees, thereby increasing the funding that will go to planning authorities. That will happen from April.

However, fees tell only part of the story. There is real value in good-quality planning. Compelling and inspirational plans can help to deliver on so many public objectives for which it is worth joining up funding streams and in which it is worth investing. Understanding the value that planning adds makes it a service that is worth supporting.

I will bring my initial comments to as close by stressing that I find this an exciting and crucial time for planning in Scotland. We face challenges, but we also have a great opportunity to reinvent our view of what planning does and to transform how we see communities, our environment and the places that we call home. I look forward to the questions that will follow and the interesting discussion that we will have today as we work collaboratively to shape a robust finalised NPF4.

**The Convener:** Thank you, minister. It is heartening to have heard your comments, which picked up on a number of issues that have come up for the committee.

I have a number of questions, so I will start, then open up the session to colleagues. My first few questions are about the NPF4 process. I

understand that it arises from planning legislation, but NPF2 and NPF3, before they were introduced in Parliament, were subject to considerably more public scrutiny than the draft NPF4. Why was a similar approach not taken to NPF4?

**Tom Arthur:** I will approach that question in three parts. First, you referred to the Planning (Scotland) Act 2019, which—as committee members will know—came from an independent review of the planning system. As members who were in Parliament in the previous session will remember, the 2019 act is perhaps one of the most scrutinised pieces of legislation that we have ever considered—indeed, it was one of the longest bill processes. I do not know whether it holds the record for the most amendments being lodged to a bill, but it must run close. As the convener highlighted, that process has informed how we have arrived at NPF4, and at the statutory requirements that NPF4 has been charged with delivering, under the six outcomes.

Secondly, the pre-consultation that led to the introduction of the draft NPF4 took roughly two years. There was originally a call for ideas, and in November 2020 we published a position statement, on which we also consulted. We signalled clearly that it was our intention to lay the draft NPF4 before Parliament for scrutiny in November 2021, and that is exactly what we did. Thirdly, it is set out in statute that we should consult for a period of up to 120 days, which is exactly what we are doing.

I want to convey the point that, looking at everything in the round—the deliberations on the 2019 act that helped to shape NPF4, the pre-consultation and the 120 days of public and parliamentary scrutiny, with a range of engagement activities taking place—I am very confident that we have had a strong and robust process of consultation and engagement, which is reflected in the excellent work that this and other parliamentary committees have undertaken on NPF4.

**The Convener:** I am new in Parliament, but my sense of the process is that we are considering a draft, whereas in other cases, scrutiny takes place once the Government has done its consultation work.

I ask my next question on behalf not only of the committee, but of stakeholders who are concerned about the process. I would love to hear from you an outline of the next steps in the process after your consultation closes at the end of March. At what point will the Scottish Parliament be able to engage in scrutiny of the revisions of NPF4? Can you give the committee an assurance that there will be time for those revisions to be scrutinised? For example, when secondary legislation is

introduced, Parliament is given 40 days for scrutiny.

**Tom Arthur:** Of course, with any secondary legislation we will conform to standing orders.

There is a continuing process of engagement. We have the public consultation and the work that Parliament is undertaking, and a range of community-based engagement is taking place as well. I would be happy to bring in Fiona Simpson, if the committee would like to hear more detail on that.

10:15

Our aim and ambition are to be in a position to bring back the finalised NPF4 for Parliament to consider before the summer recess. NPF4 differs from previous NPFs in that it requires Parliament's approval before ministers can adopt it, as the legislation says. NPF4 will be adopted only if Parliament approves it. As I said in my opening remarks, that provides added strength, which is important given that, unlike previous NPFs, NPF4 will be part of the statutory development plan.

With the convener's permission, I ask Fiona Simpson to outline the extensive community engagement work that we are undertaking to support consultation on and consideration of the draft NPF4.

**Fiona Simpson (Scottish Government):** We are going through the engagement process alongside parliamentary scrutiny. The process is different from that for NPF3, when we laid a proposed national planning framework and the level of engagement was not the same. It could be said that scrutiny is happening at an earlier stage, which provides an opportunity to bring together the Parliament's views with community and wider stakeholder views.

We are taking a range of measures and steps to involve people. We have outlined them before, but I will summarise them. We have a scheme to offer grants to help communities in the engagement process. We are running open invitation events, and we are designing the process to involve a range of interests. An equalities round-table event will happen, and the Royal Town Planning Institute will lead various round tables that will focus on different sectors. There is Scottish Youth Parliament engagement, and Play Scotland is undertaking work.

I could go on, but I will not. Suffice it to say that we are taking a range of measures to ensure that the consultation is thorough and provides an open opportunity. When we conclude the work, we will bring together all the views that we have received and we will commission an independent analysis

of them, which we will bring together with the findings from Parliament.

**Tom Arthur:** My door is always open for engagement. I will engage this evening on NPF4 with the cross-party group in the Scottish Parliament on sport, and a member has invited me to an event in their region. If any members wish to hold in their constituencies or regions additional consultation events on the draft NPF4, my officials and I are more than happy to support that, when it is possible.

I want the maximum possible engagement—that is very important. I want to seize the opportunity to transform views on the planning system. We have strong ambitions for further community engagement, which will be reflected through the new local development plan process and through our local place plans. A team effort is needed from all of us in Parliament to engage as many people as possible. I am happy to support and facilitate that in any way I can.

**The Convener:** It is exciting that so many people across Scotland from so many sectors are engaging with the process. The committee and I share your view that the approach has the potential to transform planning.

I think that Fiona Simpson used the word “proposal”. Once the document moves from a draft to a proposal, and once you have taken on board all the perspectives—I appreciate that you are doing all that listening—that might change some of the language, which will involve thinking through the detail. After that, when will the committee and other stakeholders have an opportunity to review and scrutinise that and give feedback?

**Tom Arthur:** As I said, our aim is to bring back a finalised NPF4 for Parliament to consider. I return to the point that it will ultimately be up to Parliament to decide whether to accept or reject NPF4. In the spirit of moving planning from conflict to collaboration, so that we work to get things right upstream and so that we front load things, I am working so that, when we bring back NPF4, it will strike the balance between the views that we heard in the consultation before the draft was published and those that we have heard in the consultation on and scrutiny of the draft. However, it will ultimately be for Parliament to decide whether to adopt the finalised NPF4.

**The Convener:** Thank you for that clarity.

**Graeme Dey (Angus South) (SNP):** Minister, I think the convener’s point is that the committee might draw some conclusions about where NPF4 has got to. In the timetable that you are working to, is there any scope for the Government to write to the committee giving a summary of the changes that have been made to NPF4, and, if the committee so wanted, would it be possible for us

to have a session with you? You are trying to achieve parliamentary approval and have talked about co-operation rather than conflict. If the committee were to conclude that substantial changes had been taken on board, such an approach might facilitate what you are looking for. Would the timetable allow an opportunity for what the convener is seeking?

**Tom Arthur:** That is an important point. I respect the fact that it is entirely for the committee to determine how it wishes to proceed with scrutiny. I am happy to appear before the committee at any time to discuss NPF4.

The consultation closes on 31 March, and I appreciate that parliamentary scrutiny of the draft will wrap up in the next couple of weeks. There will be a window of opportunity for further discussion before a final vote.

I ask Fiona Simpson to talk about how consultation and scrutiny feed into the final version and about the statutory requirement to demonstrate how we have listened and engaged.

**Fiona Simpson:** Andy Kinnaird might also want to talk about this. There is a requirement in the 2019 act for us to lay, along with the final version of national planning framework 4 for approval, a document that sets out how representations have been taken into account. The process is therefore transparent.

If there are substantial or significant changes, ministers will have to take a view on how substantial those are, to ensure that any requirements for additional consultation are met at that stage. It depends on the scale and significance of the changes involved.

**Andy Kinnaird (Scottish Government):** Fiona Simpson is absolutely right.

**Tom Arthur:** So far, the general feedback about the direction of travel has been very positive. A lot of the interest has been in the detail of the language. We still have to wait for the public consultation to conclude. As Fiona implied, it would be premature to suggest what level of engagement will be required when we publish the final draft. I want to achieve maximum buy-in and for everyone to feel that they have an opportunity to contribute and comment. I reiterate that I would be more than happy to appear before the committee prior to the final vote in Parliament.

**The Convener:** Thank you. It is good to have clarity about the process that we are all involved in.

I will move on. I have a few questions about the fact that a lot of this will be delivered at local level. Numerous stakeholders have voiced strong support for the Scottish Government’s intention, which is briefly outlined in policy 1, to move to a



plan-led system. However, many go further and advocate for a public plan-led system, in which local authorities would have considerably more agency to shape their local communities and to manage land use more proactively. Do the minister and his officials believe that the draft NPF4 supports local authorities to do that? Will the minister commit to taking on board that ambitious but important objective, as voiced by stakeholders?

**Tom Arthur:** I believe that NPF4 supports that. We may come on to discuss later in the meeting the question of how prescriptive or flexible certain policy language should be and the need for that flexibility so that local authorities can apply the policy to their circumstances.

As well as our approach to planning policy, we will be undertaking additional work during this parliamentary session on land assembly, compulsory purchase and compulsory sales orders. There are also provisions in the infrastructure levy in the Planning (Scotland) Act 2019. We will consider those as part of a broader review of planning obligations. We are undertaking a range of activity beyond what we are doing with NPF4 that can help to support those ambitions.

Fiona Simpson may want to add more.

**Fiona Simpson:** The local development plan will play a crucial role in the changes that we are making through regulations and guidance. Those plans will be moved from a five-year review cycle to a 10-year review cycle. They will play an important role in providing a corporately supported plan for place, which can be supported by a strong delivery programme.

That all ties in with collaboration in the planning system. We are keen to ensure that, although they cannot deliver everything on their own, planners can be facilitators and can bring people together to support delivery in a place.

**Tom Arthur:** On that focus on delivery, we will shortly undertake the second phase of the permitted development rights review, which I know will be of interest to the committee. We will also take forward work later in the year to implement the legislation on masterplan consent areas, which is another important lever for local authorities in delivering the ambitions in NPF4.

**The Convener:** My next question is connected to that point. The way in which we use land is becoming increasingly complex, with growing needs and competing pressures. It seems to me that we are at a critical point in national planning, where we need to ensure that land is used for the right purpose. Not all land is the same—we have peatland, farmland, land that is appropriate for housing and so on. However, throughout this

process, I have been struck by how limited our overall understanding is of land use in Scotland.

What work will the minister undertake to improve current land use mapping on a national scale to support those who work on spatial strategies, national developments and policies in the national planning framework? Although we are inviting planning authorities to take forward some of the work, we are also talking about things such as nature networks, where collaboration needs to happen.

**Tom Arthur:** The key word there is collaboration. The land use strategy captures many of the points that you have raised. When it was published, the land use strategy made much reference to the emerging draft NPF4—you will be familiar with the fact that a great deal of alignment exists between the two.

I will bring in Fiona Simpson to talk more about the links between land use strategy and what we are doing in NPF4.

**Fiona Simpson:** Obviously, when we were preparing the national planning framework, our approach was evidence based. We brought together a wide range of spatial data sets to inform our analysis of the different issues that we had to address. Many of those issues are wider than planning and relate to the land use strategy.

On our website, we set out a range of different data sets that we have used. We also produced a data atlas, which brings together a complex landscape of map data in order to overlay them and provide an understanding of the issue. We have touched on how the data insights that we published can inform analysis and spatial planning.

Bringing all that information together is a work in progress. We have considered the issue as part of our digital programme. We will continue to do that and to think about how to present the national planning framework and local development plans on a platform that is linked to those data sets. The process is complex, so it will take a while.

**The Convener:** It is good to know that the work is happening. I understand that it is complex, but it seems that we really need to do it.

Graeme Dey has a couple of questions.

**Graeme Dey:** Twice already, minister, you have given us comfort in relation to the issues that were raised with the committee around some of the language in the document, and have shown willingness to revisit some of that language so that it is more precise and prescriptive where it needs to be. You have also talked about the need to ensure that local authorities have the right flexibility where they need it and that the language reflects that wriggle room.

In practice, how do your officials intend to explore with planners what needs to be changed and what needs to be left as is? Is that work already under way?

**Tom Arthur:** As you will appreciate, we have been closely following all the evidence that the committee has received. Clearly, there will be shared views about the goal that the language is trying to achieve, but disagreement over whether that language is the most effective way to achieve the goal. Other critiques will be offered when there is disagreement over the substance of the policy. There is a qualitative difference between those two types of commentary, and I am open to hearing both.

Fundamentally, we now have a shared ambition about what we want NPF4 to achieve. Notwithstanding wider views, I am particularly interested in the specialist technical commentary on whether the language achieves the policy intent. We are looking at that point carefully, and it will be fed in through the scrutiny process that the committee is undertaking and through the public consultation.

However, we have to see this in the round. With 35 policies, 18 national developments and six spatial principles, the framework has to be read in a holistic way; there is, so to speak, no one policy that you can fully understand without relating it to all the other policies. Moreover, the national planning policy handbook opens with six universal policies under the theme of sustainable places that form a lens through which all the other policies have to be read. In that respect, I particularly highlight the second such policy, which relates to the importance of the climate emergency.

There is therefore a need to look at this holistically, but I very much want to hear the detailed commentary on the language that is used to ensure that we get this right. As I have said, we are very keen to listen to comments and will consider in detail all the submissions that we receive through the public consultation and the engagement process.

10:30

**Graeme Dey:** Do you accept that the use of words such as “should” can create ambiguity that might be unhelpful with regard to what you are trying to achieve and planners want to support?

**Tom Arthur:** Again, we will look at that on a case-by-case basis, but it is important to bear in mind that there is an established convention in the planning system with regard to the use of the word “should”. It has a particular meaning that is understood. I know that one of the issues that has been raised is the distinction between “should” and “must”, but I point out that “must” tends to be

used when something has to be met in statute. For example, policy 32(c) states that

“proposals likely to have a significant effect on”

a

“European site ... must be subject to an ‘appropriate assessment’”

because that is a legal requirement. The distinction has to be made, but, as I have said, I am very much in listening mode, and I want to hear views on what the language should be—if you will pardon the expression.

**Graeme Dey:** Thank you for that. I think that that answers the question.

My second question is on the resource, both financial and human, for dealing with the undoubted increase in demand that NPF4 will place on planning authorities. We have heard about councils making resource cuts to planning departments in excess of 40 per cent since 2009, and in some instances that has left departments struggling to cope with present demand, let alone the additional demands that will come with the ambitions that are—rightly—in NPF4. We will come on to the financial aspect in a moment, but the fact is that you cannot suddenly magic up hundreds of additional planners. Do you recognise as legitimate the concern that has been expressed? If so, where is the Government in its consideration of how it might be addressed?

**Tom Arthur:** I absolutely recognise that concern. Indeed, I have made that point very clear in my engagement with stakeholders and in my responses to questions in Parliament on my statement back in November introducing the draft NPF4. Delivery is absolutely key. The visions and ambitions in NPF4 are one thing—we need to deliver on the ground.

Human and financial resources are, of course, inextricably linked. At the outset, I want to say that I respect the fact that local authorities are autonomous bodies and that it is for them to decide how they allocate their budgets, but I hope that we would all recognise the immense value of planning and planners. We have introduced regulations on fees, and I am working with stakeholders not just on the implementation of those regulations but on looking at full cost recovery in future. Full cost recovery might be a neat expression, but it is quite a complex area and delivering it in practice requires a lot of detailed work and consideration. I have committed to taking that work forward. That said, I am also very clear about the link between increased fees and performance, and that long-standing view will continue to be held.

As for resourcing, I recognise the numbers that the RTPI and others have highlighted, and we are

working with the RTPI, the Convention of Scottish Local Authorities, Heads of Planning Scotland and others on how we increase the number of people coming into the planning system. I will ask Fiona Simpson to give you information on some detailed work that we are doing at the moment.

However, there are two aspects to this. One thing that we could do to encourage more people into the planning system is to catalyse the opportunity that we have right now with all the real interest and excitement in planning and what it and NPF4 can achieve and to move the system itself away from conflict not just towards collaboration but towards a focus on great place making, which is what I think inspires people to get into planning in the first place. A shift in tone on what planning can deliver is an important part of the process.

I will bring in Fiona Simpson to detail an important piece of work that we are undertaking with partners at the moment.

**Fiona Simpson:** I suggest that Helen Wood, the head of planning performance, could come in here.

**Helen Wood (Scottish Government):** As the minister highlighted, and as others have mentioned at various points in the evidence that the committee has taken, the resourcing of the planning system is absolutely—*[Inaudible.]*—to delivering all the ambitions that the NPF sets out. We are conscious that the issue is not just about the planning application fees that come into authorities, although, as the minister mentioned, we are looking to increase those fees. That increase, which will come into effect from the beginning of April, will bring in additional resources. We strongly expect that that will facilitate an increase in resources in planning services across Scotland.

We are aware—we were involved in publishing research last year on skills in planning, which highlighted this—that there is a big challenge for the system in making sure that we have enough planners to undertake all the roles in development management and in plan making and delivery. The research identified that around 700 new entrants into the profession will be required over the coming 10 to 15 years.

We support all the actions that were identified in that piece of work, one of which is to support the RTPI and Heads of Planning Scotland, which have initiated a piece of work on future planners. That work is focused on the action that is being undertaken to attract people into the profession, to raise awareness of it and to retain people in those vital roles. It is quite a short, sharp piece of work that we are delighted to be able to support. It will explore the options not just in planning, but in

other key professions where there has been a need to look at promoting the opportunities in the sector and attracting people into long-term roles.

Initial findings from that piece of work will be reported to the high-level group that is chaired jointly by the minister and COSLA. That group focuses on planning performance, and a standing item on the agenda is resourcing of the system. We take very seriously the need for us to think actively about that issue now and to put in place action to ensure that we have in place a future pipeline of planners.

**Graeme Dey:** You said that you “strongly expect” that the additional sums that will be generated by the increase in fees will go into planning resources, but does that not highlight a potential problem here? If, with the best of intentions, we move to a system of full cost recovery, what guarantee do we have that the income that will be generated from that will be directed to the purpose to which you hope it will be directed, so that NPF4 can be delivered? I recognise that you are working on a collaborative basis with COSLA but, from what I can see—unless I am wrong—there is nothing that says that, if a system of full cost recovery comes in, the income that is generated could not be directed to other council activities, which would leave the planning system underresourced, despite your best efforts.

**Tom Arthur:** You make an important point. I refer back to what I said earlier: I recognise the autonomy of local authorities to take their own decisions. Rightly and properly, those are decisions for elected members to take.

I am seeking to do what I can to support the resourcing of the planning system through fees. In the longer term, we are working towards full cost recovery. In the meantime, we are doing the short, sharp piece of work on future planners that Helen Wood outlined. We have taken action to deliver on the requirement in the Planning (Scotland) Act 2019 for a national planning improvement co-ordinator, which will be implemented in tandem with the process of increasing fees.

Ultimately, it is a matter for local authorities, but I hope that we can all agree on the vital contribution that planners can make. We are looking at creating more resilient and thriving communities as we recover from Covid. Planners, as part of the economic development infrastructure in local government, have a huge role to play in enabling us to meet our ambitions for 2045; the challenging ambition of a 75 per cent reduction in emissions by 2030; and our ambitions for housing in 2040. Ultimately, however, it will be for local authorities to determine how best to allocate their resources, and I respect that.

**Meghan Gallacher (Central Scotland) (Con):**

Good morning, minister. I will touch on the topic of 20-minute neighbourhoods, which has been discussed in the committee's evidence sessions and in gathering evidence from various focus groups. The committee has heard that the draft NPF4 pays insufficient attention to existing places and buildings, the adaptation of which will be essential to meeting climate change targets and policy goals such as community building and the 20-minute neighbourhood. How might that be tackled in the final version of NPF4?

**Tom Arthur:** That is an excellent question; I am sure that we could dedicate the entire session to discussing 20-minute neighbourhoods. One question that is often raised is how the concept of the 20-minute neighbourhood, which we immediately think of as being applicable to a densely populated urban environment, is applicable to a rural environment. Ms Gallacher raises another important question regarding what we do with our existing infrastructure.

First, we have to be aware that there are limits to what planning can do. Planning often has a strong focus on new development, in particular when we are setting out a spatial strategy to 2045. However, I highlight policy 30 on vacant and derelict land, which involves taking a brownfield-first approach and spatial principle (d), on conserving and recycling assets, which is one of the principles that inform the approach of our spatial strategy.

We have a specific suite of policies around centres, including the policy on town centre first assessment and policy 27 on town centre living. Policy 31 on rural places also captures the concept of the 20-minute neighbourhood. However, it is also important to look at the broader suite of measures that we are taking forward beyond NPF4, as part of planning reform. I referred earlier to the phase 2 review of permitted development rights, which creates another opportunity to simplify the planning system and to expedite some of the modifications and retrofits to which Ms Gallacher referred.

I also refer to my earlier answer to the convener regarding land assembly and compulsory purchase, and the forthcoming implementation of masterplan consent areas, to exemplify the range of levers that we will have at our disposal to help communities move towards, and adapt to, being 20-minute neighbourhoods.

Planning has a role to play in 20-minute neighbourhoods, but our approach in that regard is not limited to planning. The committee will be aware of the importance that STPR2 gives to 20-minute neighbourhoods and the infrastructure that is required.

I do not know whether Fiona Simpson wants to add to that.

**Fiona Simpson:** There has been an interesting debate around 20-minute neighbourhoods, and the policy and its preamble talk a little bit about retrofitting facilities in existing areas. However, we can look at that again, because we are hearing through the consultation and parliamentary consideration that there are a lot of different settings and different challenges in respect of 20-minute neighbourhoods, which are all about responding to different places and contexts. We can tease that aspect out a bit more in the policy and look at it further.

**Meghan Gallacher:** Minister, do you believe that 20-minute neighbourhoods are practical and that they will be able to be fully implemented in all settings across Scotland, with no community being left behind in that regard?

10:45

**Tom Arthur:** Yes, I do. It is important to recognise the flexibility in the concept: a 20-minute neighbourhood will perhaps be applied differently in a densely populated built-up urban area than it would be in a more sparsely populated rural area. Different approaches will be taken.

The measure ties in with a lot of other policies, such as infrastructure first, which is policy 8. It is about ensuring that people have quick and reliable access to the services and facilities that they require. We can have in our minds a concept of what 20-minute neighbourhoods look like in relation to our own environments, but it is also important to think of such neighbourhoods as a lens through which we look at planning and as a way of thinking.

I go back to the earlier point about the need for flexibility. The concept of such neighbourhoods will have different applications in different areas. It will be for planning authorities, through the LDP process, to determine how best the concept applies to their area.

An important opportunity comes from the approach not just being top down. The need for increased consultation in the new LDP process and local place plans will give local communities an opportunity to feed in to and shape the vision of a 20-minute neighbourhood for their locality.

**The Convener:** Thank you for that response. As a Highlands and Islands MSP, I really appreciate your acknowledgement that there will be different approaches.

**Paul McLennan (East Lothian) (SNP):** I refer everyone to my entry in the register of members' interests: I am a serving councillor on East Lothian Council.

I have a couple of questions, one of which is about development in the countryside. We heard some evidence that current planning legislation possibly acts as a barrier to innovative development in the countryside, which is necessary for rural diversification and maintaining rural communities. I have spoken to Scottish Agritourism on the matter, too. It is keen to double the value of the sector to £1 billion. What are your comments on how NPF4 can facilitate such development?

**Tom Arthur:** That is a good question. I will give some background on how we got to the position that we are in. We developed our thinking through carrying out a lot of specific research on how planning policy could support strong and vibrant rural communities and economies in the coming years. We engaged extensively with rural interests, including the Scottish rural parliament, the Crofting Commission and rural heads of planning, and with a huge number of rural stakeholders through meetings and community roadshows.

Through the draft NPF4, we have sought to enable the rural development and diversification to which Mr McLennan refers, to strengthen the resilience of communities and to enable infrastructure in the areas that they need. However, to come back to the point about flexibility, although we have a policy on rural places in the NPF4, not every rural area is the same, so there has to be a national policy that is broad enough to recognise the requirements of different rural areas. The work on how to deliver that policy on the ground comes through the local development plan process and the engagement that takes place.

I will give some examples. Beyond a rural policy, we have draft policies on employment, new homes, and community facilities, services and shops that recognise rural needs. That includes diversification to support farm shops and local access to fresh produce. On sustainable transport, we recognise the need for private vehicles in rural areas, and we are supporting electric vehicle charging in such areas. In addition, our policies on aquaculture, digital connectivity, green energy, heat networks and facilities for a circular economy recognise the rural aspect.

There is also recognition of rural needs in our national developments, which apply to all of Scotland. Examples are national development 5 on circular economy materials management facilities, and national development 7 on islands hub for net zero, which recognises that particular environment.

One of our spatial principles is balanced development. That recognises the need, when thinking about our planning obligations across

Scotland, to get the balance right. That means recognising concerns around sustainability and more pressured areas, as well as recognising where we need to support population retention and increase the population in other areas that are under pressure. Fiona Simpson might want to add some detail on that.

**Fiona Simpson:** The action areas and the spatial strategy have an important role to play in painting a picture of what rural development could look like in the future. We have prepared that with input from the regional perspectives and the indicative regional spatial strategies. In all of those areas, we try to set out the common issues across different parts of rural Scotland, where the assets are and where the opportunities could be. We expect that they will be picked up and explored in more detail in future regional spatial strategies, but what we are doing now is a starting point for an overall framework that will bring everything together to provide a national picture.

**Paul McLennan:** The Royal Institute of Chartered Surveyors spoke to us about how the infrastructure-first approach might be delivered. Could you expand on that? Also, the 2019 act mentioned the possibility of an infrastructure levy. Could you say a little about that, too?

**Tom Arthur:** On the latter point, as I mentioned earlier, we have an on-going review of developer contributions and we are taking forward that provision in the 2019 act. We will take a phased approach to that, because we are conscious that, at the moment, we are asking stakeholders to do a huge amount of work in connection to the national planning framework 4 and draft regulations and guidance on local development plans. However, it is absolutely something that we will take forward later in the parliamentary session, and the review that we are conducting just now will inform the shape of that.

An infrastructure-first approach is, ultimately, about achieving alignment between planning and infrastructure provision. Clearly, this is work that has come out of the Infrastructure Commission for Scotland and is informed by the hierarchy of sustainable investment in infrastructure, which involves planning for the future, maximising the useful life of existing assets and repurposing and co-locating activity. It is only after those possibilities have been exhausted that we start to think about replacing or creating new assets.

Although we have an explicit infrastructure-first policy—policy 8—it is also something that is embedded throughout the document, so to speak. We can see how policies around 20-minute neighbourhoods, for example, can complement an infrastructure-first approach, as they will involve development where there is existing infrastructure.

Fiona Simpson might want to add something.

**Fiona Simpson:** We have done work with infrastructure providers and we set up an infrastructure delivery group as part of the wider planning forums that we conducted. A lot of that work has been around how the new planning system can provide certainty and confidence for infrastructure providers, whether public or private, and give them assurance that sites will be allocated and plans will be brought forward and built out. That discussion is on-going, and infrastructure has been an important consideration for the local development plans, regulations and guidance, and for our thinking about how we can ensure that plans actively take an infrastructure-first approach and work with capacity and the providers in a way that means that there is a clear route to delivery.

**Paul McLennan:** Minister, you talked about connectivity in relation to the housing to 2040 strategy, the third national land use strategy and so on, all of which are important, although they have different timescales attached. The key thing for me is, how do we monitor that connectivity during the period of NPF4? We need to ensure that the connectivity that exists at the outset remains in place as NPF4 evolves. Obviously, the “Housing to 2040” strategy is vitally important.

**Tom Arthur:** When you read the “Housing to 2040” document, the references to and the connections with NPF4 are clear and explicit, whether they involve town centre living, community wealth building and so on. However, I have been reflecting on the comments that have been made about the connection between other policy documents and NPF4.

Irrespective of the comments that I made in my opening statement about the need to recognise the distinct nature of this document as part of the statutory development plan, I will reflect on how we can make the connections more explicit, perhaps by producing some supporting documents to help make clear to members of the Parliament and wider stakeholders and users of the planning system what those connections are. While recognising the unique nature of NPF4, I want to ensure that we make the links clearer and more explicit, so I am happy to consider how we could do that through additional guidance. The connections will also be reflected in the final delivery plan for NPF4, which is yet to be published and adopted.

**Paul McLennan:** That will be welcome. Heads of Planning Scotland specifically referred to the point. I look forward to seeing that guidance.

My final question is about connections not so much to policies but to other measures. The key ones are the minimum all-tenure housing land

requirement figures and the housing needs and demand assessment. At a previous meeting, Homes for Scotland mentioned those figures, which set a context for the rest of NPF4 and specifically how we deliver the “Housing to 2040” strategy. Will you talk a little bit more about that? Homes for Scotland was keen to explore the issue with you. I do not know what discussions are already going on. Will you also say a bit about how progress will be monitored over the period of NPF4 and how we will deliver the figures in the strategy?

**Tom Arthur:** It is an important issue and I am grateful to Homes for Scotland for all its constructive engagement and the evidence that it has provided to the committee. I look forward to continued engagement with Homes for Scotland and other stakeholders as we work towards finalising NPF4.

There is no getting away from the fact that housing numbers have been and remain one of the most contentious aspects of the planning system. We probably all have experience of that as representatives of our respective constituencies and regions. One of the things that we seek to do through the approach to housing in NPF4 is to get away from debates about numbers and processes and to focus on making great places. The minimum all-tenure housing land requirement is our response to a statutory requirement from the 2019 act. We have taken a constructive collaborative approach and have engaged extensively with local authorities to arrive at the numbers.

I draw attention to the language that has been chosen. “Minimum all-tenure housing land requirement” is perhaps not the neatest expression and I am not quite sure how we pronounce it as an acronym yet but I stress the first word: minimum. The numbers are not a cap or an aspirational target but the minimum that we expect to be in local development plans. If planning authorities, in preparing local development plans, are able through local knowledge and research to provide robust evidence of a need to increase the numbers, that can happen. LDPs will be prepared following the adoption of NPF4, so there will be an opportunity to use more up-to-date information as it becomes available. As we move towards adopting a final NPF4, we will review and refine the numbers. However, the requirement is a starting point for LDPs.

I realise that there are varying views on housing numbers. Some people will think that the numbers are too high, some will think that they are too low and other stakeholders will think that we have got it just right. The numbers represent the starting point. They are 10-year figures. We wanted to

allow the focus to move to the delivery of great places. I think that we all share that ambition.

I do not know whether Fiona Simpson wants to add anything to that.

**Paul McLennan:** I will ask another question before we bring in Fiona Simpson. What lessons on deliverability can we learn from previous frameworks that we can take into NPF4 to ensure that we maximise deliverability? It is important that we have the housing targets but it is vital that we learn lessons on deliverability from previous frameworks. What will we take forward from them?

**Tom Arthur:** I will make one point: we are talking not about targets but about minimums. It is really important to bear that in mind.

I ask Fiona Simpson to come in.

**Fiona Simpson:** We are trying something new with the approach that we have taken to housing in the national planning framework. We have undertaken a rigorous evidence-based process. We have taken steps to make it transparent and have not done it on our own. We have worked closely with local authorities to ensure that the minimum numbers are correct.

There is a lot to learn from thinking about how the system works at the moment. For each local development plan, there is often a lengthy debate about housing numbers. By setting out those numbers in the national planning framework, we should be able to move on from that. We will have a minimum to build on, which means that the local development plan will be able to focus much more on the sites and how the place should evolve in the future. Local authorities will be able to think about the choices that they can make and involve people in discussions about that.

11:00

As the minister mentioned, the policy also has a strong emphasis on deliverability, which has a really important link to the infrastructure-first approach. Less time will be spent on debating numbers in the local development plans. People have different views on housing, but I think that everyone agrees that the system could be improved if we focus less on precise numbers and take a broader, longer-term and more flexible approach to housing.

**The Convener:** Before I bring in Willie Coffey, I will bring in Meghan Gallacher again, as we have a bit of housekeeping to tidy up.

**Meghan Gallacher:** Thank you, convener. I am very grateful. I apologise to the committee. Before I questioned the minister, I should have referred members to my entry in the register of members' interests, which states that I am a serving

councillor on North Lanarkshire Council. I would be grateful if that could be added to the record.

**The Convener:** Thank you, Meghan.

**Willie Coffey (Kilmarnock and Irvine Valley) (SNP):** Good morning, minister. I want to touch on a subject that has come up time and again in our evidence sessions to date, which is how the NPF4 can influence the look and feel of our town centres. As you know, and as all members will be aware, we all suffer from complaints from constituents about our high streets, where there are abandoned or derelict parcels of land, and that also applies to shops and buildings. Multiple ownership is often involved.

In one of our sessions, we heard from Celebrate Kilmarnock about some of the good work that is going on down there to create more community spaces and dispose of old redundant properties and buildings. Yesterday, the committee met some people in Govan and we heard some of their wonderful ideas about regenerating that part of the city of Glasgow. Will you give us a flavour of how the NPF4 can influence the look and feel of our town centres to deal with the problems I have mentioned, some of which have been prevalent for many years?

**Tom Arthur:** Again, we could dedicate an entire session to that question. I had the pleasure of visiting Govan—I think that it was in August—and seeing some of the outstanding work that is being done there, so I am not surprised by how impressed you were. That work is an example of what can be achieved.

NPF4 has a very big role to play, of course, but it is not going to deliver that change alone, and neither is the planning system. Within NPF4, in relation to shaping our future development, we have specific policies such as policy 24, on centres, and policy 25, on retail and the limiting of out-of-town development, which we know has had a big impact on occupancy rates in our town centres. We also have policy 26, on town centre first assessment, and policy 27, on town centre living. There is a suite of policies. Vacant and derelict land is also covered.

Beyond that, there is the work on permitted development rights that I mentioned earlier, the work on land assembly and CPO, and the work on masterplan consent areas. A huge amount is being done on the planning system and what we can do with it. Other work that I am taking forward through other aspects of my portfolio includes work in response to the review of the town centre action plan that was conducted by Professor Leigh Sparks. We are working at pace with COSLA to deliver an action plan in response to that.

You will also be aware of the forthcoming national strategy on economic transformation,

following which we will publish a retail strategy, which has been developed with stakeholders.

We are seeking to pull a range of different levers to influence the amenities, services and range of opportunities that are available in our town centres and urban spaces. It will take a collaborative approach, and local government obviously has huge involvement as the lead agency in delivery. We provide support, including for example through the £325 million place-based investment programme and the £50 million vacant and derelict land programme, which has a role to play.

Fiona Simpson, do you want to foreground any particular points on the planning system within NPF4?

**Fiona Simpson:** There is a strong emphasis on the planning system throughout the document, through the spatial strategy, and in the updated policies that the minister has outlined. Development planning has an important role to play in all that. We are looking at the recommendations of the town centre review and thinking about how the town centre audits and the strategies for town centres link with the planning system. A whole range of different things are set out in the document.

We have covered city centres as well as town centres in learning lessons from the pandemic and the change in places and long-term mix of uses in those areas.

**Tom Arthur:** The key point is that it cannot be done to communities; it is essential to do it with communities. Working with local partners, such as development trusts, community councils and other community groups, local place plans, which have recently come on line through regulations, provide an excellent avenue for shaping local development plans and having those conversations.

I hope that gives a rounded view. I know that we are here to discuss NPF4 specifically, but we cannot see it in isolation when we consider how to tackle the challenges that are faced by our town and city centres.

**Willie Coffey:** In the absence of new proposals that might be delivered within the context of NPF4, how do we deal with the high streets that have—as we saw yesterday—empty, abandoned and derelict cinemas and shops, with trees growing out of them and graffiti all over the windows? There are no plans or proposals coming from the communities at the moment for any of that stuff. Are the planning powers that we have sufficient to deal with any of that?

Local people ask me what they can do about the problem and how they can help to improve the powers that the planning authorities need so that

they can intervene and turn those areas around. There is a hope that NPF4 will embrace that and allow the local authorities to intervene more directly to improve the look, feel and vibrancy of built heritage in the urban setting that has been dormant and abandoned for so long. Anything that you could say on that would be very welcome, minister.

**Tom Arthur:** At the heart of that, you are posing a set of profound questions, Mr Coffey. Local authorities have at their disposal powers to make amenity notices. A huge number of factors are at play. Planning is a lever but is not one that we can just pull to produce an immediate response—it takes time. That is why we have to focus on town centre and city centre living. For example, when we get people back into an area, we increase demand, which incentivises economic activity, which can incentivise uptake in the occupancy of units. Several different factors will influence that. However, local living is key.

We are also trying to focus development back on to our town centres using a brownfield-first approach. As we discussed earlier, there are other levers to consider such as permitted developments, use classes and reforming compulsory purchase—we will take that forward later in the parliamentary session. They all have roles to play.

At the heart of regenerating our town centres is town centre living. We are already seeing proposals for that in different localities across the country and on different scales. There are particular policies in NPF4 that can seek to stimulate more people going into town centres and persuade against development outwith town centres and on the edge of towns, but it will need a long-term approach. No lever that we can pull will have an immediate effect. A place-based approach must involve engagement with local communities.

That is why I am consciously not trying to suggest that there is some grand plan and that a minister can come in from on high, implement that and solve all the problems of a particular local community. There is a job in supporting and providing the framework within planning, providing resourcing, and providing the tools for planning authorities where they require them, whether that is in updated CPO powers, PD rights or masterplan consent areas, for example.

The key thing is to get more people living in our town centres and empowering those communities. Local place plans have a huge opportunity as vehicles for doing that.

Fiona Simpson might want to add to that.

**Fiona Simpson:** I do not have anything specifically on that, although I should say that



involving people through local place plans and taking an interest in their place could make a real difference to that sort of thing. Andy Kinnaird might want to add something about legislative powers.

**Andy Kinnaird:** I will say a bit more about what the minister said about amenity notices as a power that is currently available to authorities. Authorities can use amenity notices to do something about the look and feel of vacant or abandoned properties in their town centres. A mix of existing powers is available to authorities, and we are trying to do a little to strengthen those powers.

Authorities can serve amenity notices on the owner, lessee or occupier when the amenity of an area is being adversely affected by the condition of the land. Alongside that is the crucial element that, if steps have not been taken once an amenity notice has taken effect, the authority can go on to the site and take direct action to carry out the improvements that the notice required.

I appreciate that there are cost risks to the authority in doing that. It can claw back its costs and any administrative expenses, but traditional debt-recovery methods have not always been entirely successful. As a result, there might be a bit of reluctance among authorities to take that financial risk. Obviously, they recognise the resource pressures that authorities are already under. For that reason, the 2019 act includes new powers. A planning authority can place a charging order on the property title, which can ensure that it is able to recover the costs.

We have programmed the work on implementing the charging order powers, which will need some new regulations, to be taken forward later this year.

**Willie Coffey:** That is really helpful. That has been a recurring theme for the committee, and those comments are welcome.

My final question is about how NPF4 integrates with other things. You mentioned STPR2. I am also interested in how NPF4 integrates with the city growth deals, for example. Our Govan friends talked about that yesterday. One of their onstream projects will be funded through the city growth deal. How do you see NPF4 integrating with other major initiatives such as city growth deal funding and the levelling up funding that is, as we know, coming in from another direction? How can we ensure that it is all co-ordinated and everybody is singing from the same hymn sheet as far as possible?

**Tom Arthur:** That is a fair point. Fundamentally, NPF4 is integrated, because the hymn sheet that it is singing from is the same hymn sheet that the growth deals are singing from—that is, the range of policies that we already have in place. The national transport strategy, the “Housing to 2040”

strategy and the land use strategy publications all predate NPF4, but there has been close collaboration across Government in the development of the proposals, and there is an iterative effect. Just as the infrastructure investment plan influenced NPF4, NPF4 will influence the next infrastructure investment plan. That has already taken place.

The need to demonstrate more clearly where those links are and to make them explicit has emerged from the committee’s deliberations during the past few weeks. I appreciate that some of the links can be more apparent if a person is immersed in this and sitting reading all the documents side by side. However, a person might be approaching NPF4 for the first time, and we want the document to be read by as many people as possible—planning is not just for planners, of course. I recognise the point about being able to help people to orient and see how it integrates into the wider policy landscape.

I suggested earlier that we could look at how we could publish an additional piece of guidance or reference on how NPF4 reflects the wider policy landscape and how that wider policy landscape influences things such as growth deals and what local authorities might seek to do with levelling up money. Fiona—do you want to add anything to that?

11:15

**Fiona Simpson:** The changes that we are making to strategic planning to introduce regional spatial strategies aim to achieve a greater horizontal alignment at a regional scale. We found that when authorities got together to prepare indicative regional spatial strategies, the geography of that broadly reflected the city and growth deal geography. As they were formed and as we exchanged learning on that, there was a lot of discussion about how the city and growth deal proposals could be reflected in the spatial strategies, and how the spatial strategies could provide the vision that various collections of projects could help to deliver.

That iterative process between spatial planning and thinking about the city and growth deals is embedded in the early work that we have done on that, but as regional spatial strategies come forward and are enacted as part of the 2019 act, we will see more alignment at that scale. It is designed to be more flexible. It is not on a fixed review timescale; it can come and go and be more agile to reflect the different opportunities that might arise.

**Mark Griffin (Central Scotland) (Lab):** We have repeatedly heard from stakeholders in person and in writing that they are positive about

the ambitions that are contained in NPF4, but that they question their deliverability—or, not so much the deliverability but their ability to scrutinise the deliverability. Why was the draft document not accompanied by a draft delivery plan to enable that scrutiny and will a delivery plan be published before the final draft of NPF4 is laid?

**Tom Arthur:** The thinking is that when we publish the final NPF4 draft, we will set out how it will be delivered. It is a legitimate question—why not publish a delivery plan at the outset? I was conscious that I did not want to prejudge the outcome of the consultation, engagement and scrutiny. The other aspect is that when we publish a delivery plan, as I referenced in my opening statement, it will not be a capital investment plan. It will be a development plan. A lot of the ways that it will be delivered from a public sector side are already illustrated in other strategies. Mr McLennan made reference to “Housing to 2040”, which is one example.

The important thing to remember is that it is not just the public sector that is delivering this. It is a partnership approach between national Government and local government, and the private sector also has a huge role to play in its delivery. Planning works as a facilitator and an enabler. We are working with the Scottish Futures Trust on that.

Following the publication of the final NPF4, we want to get to a position where we can deliver a delivery plan—a bit of a clumsy phrase—that will highlight and bring together the various streams of funding that are available to support realising the vision and ambition that is in NPF4. However, I note that a lot of those funding streams are already online. I made reference to things such as the place-based investment programme, vacant and derelict land and our commitments on resourcing for “Housing to 2040”. A lot of that is already live.

On the points that were made about how NPF4 relates to other strategy documents, the delivery plan will help to answer that by bringing together and highlighting the different vehicles that will be deployed to realise what is in NPF4.

Have I missed any points that Fiona would like to pick up on?

**Fiona Simpson:** We published an online action programme for NPF3 and, although we kept it updated, it was still relatively static. We can learn from and improve on that and have a more live and dynamic document that has been signed up to by a wider range of parties. We will need a bit more time to do the collaborative work that we are doing just now to see how that will be constructed and work in practice, but it is important that this is not just a single one-off document but something

that is open, transparent and kept updated by all the parties involved.

**Tom Arthur:** The key word there is “collaborative”. A collaborative process has got us to this point; we have put a collaborative process in place for the consultation that will take us to the final draft; and the delivery of all this will also involve a collaborative process. The reality is that delivery is dynamic—we cannot have a single, fixed and immutable document. I hope that that gives you a sense of how we will deliver NPF4 once it is adopted.

**Mark Griffin:** I appreciate the commitment. As I have said, this has been a common theme in the submissions and the evidence-taking sessions that we have had so far.

Once approval is given and the delivery plan is published, the document will be in place for 10 years instead of the previous five. How will progress with the delivery plan be reviewed? As I am sure you will agree, any review of progress will be far more important with a 10-year rather a five-year timescale.

**Tom Arthur:** If the past two years have taught us anything, it is that the future is inherently uncertain. However, as we have said, this will be a live document, and I have no doubt that there will be rigorous parliamentary scrutiny of whether the aspirations in NPF4 are being delivered on.

**Mark Griffin:** Thank you.

**The Convener:** I call Miles Briggs.

**Miles Briggs (Lothian) (Con):** Good morning. I thank the minister and his officials for joining us.

I want to carry on with Mark Griffin’s and Paul McLennan’s line of questioning and ask specifically about Homes for Scotland’s concerns about the likelihood, as it stands, of NPF4 reducing the number of homes that will be delivered. Obviously, that will exacerbate the housing crisis if it happens. I have listened to what you and your officials have said about local plans moving to a 10-year timescale, but I wonder whether you can give more detail on the mechanism for introducing additional land. What will that look like? We have been talking about open and transparent processes, but how is that sort of thing being put into NPF4? After all, that issue will be important to a lot of communities.

**Tom Arthur:** We should recognise that the total allocation in the minimum all-tenure housing requirement is 200,000 homes over the next 10 years, or 20,000 a year. However, as I said earlier—and notwithstanding the fact that we will seek to refine the numbers ahead of the final draft—local authorities will, in developing their own local development plans, through the housing need and demand assessments in their local

housing strategies and as a result of a robustly evidenced process, be able to increase those numbers.

On your point about transparency, we talked earlier about the need for engagement in local development plans—and, indeed, the input that local place plans can make, too—and that will play a very strong and central part in addressing the question of transparency. As I have stated, these are the minimum numbers, not aspirational targets. They are the starting point for authorities in developing local development plans and, where additional need is identified and evidenced, the numbers can be increased. It will be really helpful and important to do this in a collaborative way, as that will allow us to take advantage of, for example, local place plans and that kind of community engagement.

As has been recognised, when we think about planning for housing, we often think about the mailbags that MSPs get, and we know the kinds of issues that are raised. Setting those numbers out for the next 10 years is part of that process. By having that early engagement through the LDP, we can move away from some of the conflict that there often is around housing numbers and move towards talking about how we can develop great places. We need to remember that what makes a home does not just stop at the front door; it is about the community. That relates to the broader suite of policies that we were discussing earlier, such as 20-minute neighbourhoods.

Do Fiona Simpson and Andy Kinnaird want to come in on some of the process points around LDPs?

**Fiona Simpson:** I draw attention to policy 9 (i) in the NPF. Overall, we are trying to have a strong, plan-led approach to housing provision, making it flexible and deliverable through a pipeline of housing land that can flex depending on the way in which sites are built out and the timing of that. Policy 9 (i) also includes a bit of flexibility on that, allowing sites to be brought forward if the land that has been allocated for housing has been used up and is being built out.

The aim is to strongly incentivise the construction of houses on the sites that are allocated for housing. That is an important mechanism in the policy as a whole, and there is a lot more detail around that in the local development plan guidance and regulations. We have set out how we expect planning to be done. We also expect more attention to be given to monitoring of housing land, and we have been looking at the housing land audit process as part of that.

I ask Andy Kinnaird to add something on the mechanism for updating local development plans.

**Andy Kinnaird:** That is worth a mention. Like the NPF, local development plans will be moving from a five-year cycle to a 10-year cycle, which can be quite a long period to look ahead. The Planning (Scotland) Act 2019 allows us to bring forward regulations that would make arrangements for how a planning authority could amend its local development plan without going to a full review. If a high level of housing was being delivered within that 10-year period, that would provide the opportunity for that aspect of the LDP to be amended to account for more housing further down the line.

**Miles Briggs:** That is helpful. One of the key things that I have picked up during the committee's work on planning is that it needs to be accompanied by a 10-year capital investment plan across the public sector. That will be challenging for the national health service and education services, in particular. The minister will be aware of conversations that we have had in the Health, Social Care and Sport Committee about how a lot of new-build development can destabilise general practice surgeries. Therefore, we need to see that complementary capital investment.

My other question is about renewables. We have received some evidence expressing concern that NPF4, as it is currently drafted, could lead to delays in renewable energy developments. The minister said that he uses the word "minimum" in terms of numbers expected around housing. Is it the same for targets around renewables? Is it your opinion that we need to see a presumption in favour of renewables in NPF4? Again, the language will be key. Local authorities will be delivering not necessarily targets but the minimums that we expect.

**Tom Arthur:** I will pick up on the point about the language. It is the minimum all-tenure housing land requirement. That is an important distinction in planning. It is important to make the point that we are talking about housing land.

I recognise the points that Miles Briggs has raised, and I look forward to further dialogue and engagement with the renewables sector—I am very open to that—as we move towards the finalised version of NPF4. We all recognise the categorical importance of renewables in delivering our investment ahead of 2045. When we look at our suite of planning policies, it is important to bear in mind not just the specific policy on green energy—policy 19, from memory—but policy 2, on the climate emergency, which is also key. It is the second policy in the policy handbook. Policy 2 (a) says:

"When considering all development proposals significant weight should be given to the Global Climate Emergency."

That is at the heart of NPF4. We recognise that the planning system must do all that it can to support us in our journey to net zero, and the role that renewables have to play is implicit, well understood and well recognised.

Perhaps Fiona Simpson would like to add some specifics on the policy.

11:30

**Fiona Simpson:** We are obviously aware that there are lots of different views on the approach that we have taken to renewable energy policy. We have had some useful discussions with the industry and, as we consider the policy and whether it will achieve what we are trying to achieve, we are having wider discussions involving a range of stakeholders. There is a lot of detail in the policy, and we will look carefully at the wording to ensure that the intent is carried through in the way that it is drafted.

**Tom Arthur:** On intent, policy 19 (a) says:

“Local development plans should seek to ensure that an area’s full potential for electricity and heat from renewable sources is achieved. Opportunities for new development, extensions and repowering of existing renewable energy developments should be supported.”

That is categorical. However, having said that—I refer to points that Fiona Simpson made earlier—we, of course, want to hear detailed commentary and analysis of the language to ensure that we deliver on the policy intent. I am open to continued dialogue to achieve that ambition, which I think we all share.

**Miles Briggs:** That is helpful. My question is on the draft delivery plan. I note that the onshore wind policy statement specifically looks at 8GW to 12GW of onshore wind being delivered in a much shorter timescale than we had in which to deliver the renewable energy that we now produce. Planning departments will look at renewable energy projects, although they will not necessarily take them forward. There is a huge issue around how we meet the target and what delivery plan the Scottish Government expects local authorities to use. Often, the planning authorities that are involved are large and rural rather than urban. I would be interested in seeing where the discussion goes. It is possibly something that we can take forward around the draft delivery plan. The devil will be in the detail.

**Tom Arthur:** I think so. It is a discussion that I look forward to having.

Another point, which picks up on Mr Dey’s earlier line of questioning, is the importance of resourcing our planning authorities, which underlines why we have taken the action that we have taken on fees. We recognise the key role that planning authorities will play in realising our

ambitions and obligations around delivering renewable energy.

**The Convener:** I notice that we are at time, but I would be grateful if you would stay with us for a little bit longer. I have a couple more questions that I am keen to ask, and the discussion has been useful for the committee.

My first question is on priorities. Several witnesses have asked for clarity on how developers and decision makers should balance or prioritise the four priorities that are set out in the national spatial strategy, the six spatial principles, and the development priorities that are set out in the five action areas and individual national planning policies. We took oral evidence from Christina Gaiger from the Royal Incorporation of Architects in Scotland, who argued:

“the document covers a huge amount of ground, and because not everything can sit in one place, we need a hierarchy ... there needs to be some sort of primacy amongst these policies to help people understand where the priorities themselves lie.”—[*Official Report, Local Government, Housing and Planning Committee, 25 January 2022; c 11.*]

Do you intend to take forward the idea of a hierarchy?

**Tom Arthur:** To preface a more general point, I note that, specific to NPF4, we have six universal policies under sustainable places. We previously discussed policy 2, on the climate emergency, and the significant weight that should be given to it. That runs throughout.

More generally, there is a job, which is best done by local planners, in balancing competing priorities. Ultimately, planning is about mediating space and creating places, which is a job that planners have to do. They have to balance competing priorities, which involves a judgment call. It could be argued that planning is as much an art as it is a science. We cannot have planning by algorithm. We cannot automate the planning process or take out all the human agency or decision making that is involved in it. Planners will continue to have the role of judging and balancing competing priorities on the basis of local knowledge.

Having said that, I recognise the points that have been made about the language and whether that should be made more detailed in order to avoid unintended consequences or to ensure that the policy intent is fully delivered.

The document must be read in the round. It is holistic. I know that there is a huge amount in it, but planning is broad and touches on almost every aspect of our lives. That is, unfortunately, unavoidable. It is why we depend on the expertise and skill of our planning professionals.

Fiona Simpson may want to add to that.

**Fiona Simpson:** There is a unique context for each decision, and it is for decision makers in each case to determine what weight to give to policies. I echo the view that we can look at the readability and the structure and hierarchy of the final draft to see how clear we are being about priorities.

**The Convener:** I do not want to open up a discussion, but I find it interesting that you have linked the NPF4 with the sustainable development goals although no one has brought that up in any of our evidence sessions. That is sitting there. There are 17 important internationally acknowledged goals, and they seem to underpin what you are trying to do with NPF4.

I will move on. The draft NPF4 makes no direct mention—except perhaps within the sustainable development goals—of the needs of women, children or disabled people, and it does not mention how the planning system can help to remove barriers to their use and enjoyment of the built environment. Fiona Simpson said that there is going to be an equalities round table. Can you tell us more about how you might remedy that oversight?

**Tom Arthur:** That is a really important question. The obligations placed on NPF4 by the 2019 act make improving equality and eliminating discrimination a requirement. Policy 4, on human rights and equality, is one of the six universal policies through which the whole of NPF4 must be understood.

Notwithstanding that, I recognise your point. I recently had an excellent and informative discussion with Engender, and we will reflect on that before we put forward the final draft of NPF4. The framework has to be for everyone.

Notwithstanding our obligations under the equalities legislation and the obligations placed on NPF4 by the 2019 planning act and by policy 4, it is important that we always recognise that a person's definition of "accessible" or "safe" or of what might constitute a 20-minute neighbourhood will be predicated on their own personal circumstances. Planning professionals recognise that instinctively when they apply the principles, and I am conscious of the ask to make that more explicit within NPF4. I gave an undertaking to Engender—and I give an undertaking to the committee—to do that as we move towards the final draft.

Fiona Simpson may want to add to that.

**Fiona Simpson:** The draft has been informed by a rigorous integrated impact assessment that covers equalities, a fairer Scotland duty assessment, a child rights and wellbeing impact assessment and an island communities impact assessment. All of those showed that the draft is

heading in the right direction to create better places for everyone.

We will take into account and build on the views that come from the consultation, and we will look at the final draft to see whether there are areas that should be explored further.

**The Convener:** Thank you. That is welcome.

Graeme Dey has a supplementary question.

**Graeme Dey:** Parliament and its committees are very good at calling on the Government to listen to the views of stakeholders and of Parliament, which is as it should be. I am heartened by what I have heard today about the on-going work that is part of the process. You have talked about engagement on equalities issues and about the work that has gone on and that is still to be done on the delivery plan. You have committed to further engagement with the committee. We have also heard about a great deal of work that is going on with multiple stakeholders. Given all the laudable effort that is still going on to get this right, is the timetable for bringing a completed NPF4 to Parliament for confirmation by the summer realistic?

**Tom Arthur:** That is a very good question, and it comes from someone who has had much experience of bringing forward legislation and documents.

I am heartened by the discussions that we have had not just today but in general, because, notwithstanding some areas of contention, what we are really talking about now is fine tuning and making the document the best that it can possibly be. I am not picking up from the committee or from wider stakeholders that there are fundamental disagreements over the direction of travel.

We have an opportunity to work intensely and at pace, and we can bring forward a finalised NPF4 for Parliament to vote on and for ministers to adopt by the summer recess. That reflects the collaborative work that has been undertaken over the past two years. I pay tribute to my predecessor, Kevin Stewart, for the work that he undertook on NPF4 when he was the minister with responsibility for planning.

We are in a very good place. The important thing is that we need to get this right. Quality cannot be sacrificed for speed, because this is going to be a hugely important document. It will define our spatial strategy up until 2045, and that is my priority. We are in a very good place and there is intense work and continued engagement as we work towards the end of the public consultation phase, on 31 March. I am confident that we can have a finalised NPF4 for Parliament to consider before the summer.

**The Convener:** Thank you for that response. We look forward to that.

I thank you and your officials for your evidence today, and I want to let you know that the committee expects to publish its report on the draft national planning framework in April.

We will have a short break before we reconvene in private for item 2. As that was the only public item on our agenda, I now close the public part of the meeting.

11:42

*Meeting continued in private until 12:28.*

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