



OFFICIAL REPORT
AITHISG OIFIGEIL

DRAFT

Local Government, Housing and Planning Committee

Tuesday 14 May 2024

Session 6



The Scottish Parliament
Pàrlamaid na h-Alba

© Parliamentary copyright. Scottish Parliamentary Corporate Body

Information on the Scottish Parliament's copyright policy can be found on the website - www.parliament.scot or by contacting Public Information on 0131 348 5000

Tuesday 14 May 2024

CONTENTS

	Col.
DECISION ON TAKING BUSINESS IN PRIVATE	1
NATIONAL PLANNING FRAMEWORK 4 (ANNUAL REVIEW)	2
SUBORDINATE LEGISLATION	45
Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2024 (SS1 2024/102)	45

LOCAL GOVERNMENT, HOUSING AND PLANNING COMMITTEE
15th Meeting 2024, Session 6

CONVENER

*Ariane Burgess (Highlands and Islands) (Green)

DEPUTY CONVENER

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

COMMITTEE MEMBERS

*Miles Briggs (Lothian) (Con)

*Stephanie Callaghan (Uddingston and Bellshill) (SNP)

*Pam Gosal (West Scotland) (Con)

Mark Griffin (Central Scotland) (Lab)

*Gordon MacDonald (Edinburgh Pentlands) (SNP)

*attended

THE FOLLOWING ALSO PARTICIPATED:

Ian Aikman (Heads of Planning Scotland)

Esmé Clelland (Scottish Environment LINK)

Claire Daly (Climate Emergency Response Group)

Morag Ferguson (Comhairle nan Eilean Siar)

David Givan (City of Edinburgh Council)

Mairi Maciver (Comhairle nan Eilean Siar)

Clare Symonds (Planning Democracy)

Morag Watson (Scottish Renewables)

CLERK TO THE COMMITTEE

Euan Donald

LOCATION

The David Livingstone Room (CR6)

Scottish Parliament

Local Government, Housing and Planning Committee

Tuesday 14 May 2024

[The Convener opened the meeting at 09:08]

Decision on Taking Business in Private

The Convener (Ariane Burgess): Good morning and welcome to the 15th meeting in 2024 of the Local Government, Housing and Planning Committee. I remind all members and witnesses to ensure that their devices are in silent mode. Pam Gosal and Stephanie Callaghan are joining us online, and we have received apologies from Mark Griffin.

The first item on our agenda is to decide whether to take items 4, 5 and 6 in private. Are members content to do so?

Members *indicated agreement.*

National Planning Framework 4 (Annual Review)

The Convener: The next item is to take evidence on the committee's annual review of national planning framework 4 from two panels of witnesses. On our first panel, we are joined in the room by Ian Aikman, who is the chair of Heads of Planning Scotland, and David Givan, who is the chief planning officer at the City of Edinburgh Council. We are joined online by Morag Ferguson and Mairi Maciver, who are both planning managers at the Comhairle nan Eilean Siar. I welcome all the witnesses to our meeting. I love the backdrops of the witnesses who are online. Thank you for that—they are really lovely.

I remind members and those who are participating in the session that there are active legal proceedings concerning the interpretation of NPF4 policies and the interaction between those policies and existing local plans. Under the Parliament's standing orders,

"A member may not in the proceedings of the Parliament refer to any matter in relation to which legal proceedings are active except to the extent permitted by the Presiding Officer."

Although we do not wish the discussion and debate to be unduly restricted, I ask members and witnesses to avoid referencing specific matters that are currently before the courts.

We turn to questions. We will try to direct our questions to a specific witness where possible, but if you would like to come in please indicate that to the clerks. I ask Morag Ferguson and Mairi Maciver to indicate that they want to come in by typing R in the chat function. There is no need for you to turn your microphones on and off because our broadcast team will do that. Morag and Mairi should note that there might be a slight delay before their mic is turned on. Do not worry about that; we are aware of the pause.

I will begin with a couple of questions. I will direct the first question to Ian Aikman. The committee keeps on hearing calls for the Scottish Government to establish a hierarchy of NPF4 policy priorities. The idea of doing so would be to assist decision makers and developers. Do you think that that would be a good approach? If you do, why? If you do not, why not?

Ian Aikman (Heads of Planning Scotland): Good morning. There are probably a variety of views at Heads of Planning Scotland on that, but I will temper that by trying to provide you with the broad view. However, I may occasionally dip into my own view as chief planning and housing officer at Scottish Borders Council.

A formal hierarchy of policy is probably not absolutely necessary. We need to read the document as an entity and as a whole and to balance the range of policies that are in it. Indeed, that is what we do as planning professionals: we balance the competing elements in light of the local circumstances that apply to a particular development and apply them accordingly. That means considering the key principles of providing sustainable, liveable and productive places, taking a holistic approach, accommodating local situations and taking account of local factors.

I do not think that there really is such an approach, but that is something that will, by its nature, evolve as a broader case load of applications comes through the system and the policies are applied to them.

The Convener: It is about bedding in the new policy framework and understanding how all the things work together.

Ian Aikman: I think so. You have probably heard on numerous occasions that it is still fairly early days. It is a transitional process while we are working through what the policies mean and the implications of those.

The Convener: Thank you very much for that. As no one else has an opinion about the hierarchy aspect—I do not see anyone wanting to jump in—I will move on to my next question.

Another thing that we have heard from witnesses is the need for planning authorities to take a proportionate approach to the amount of information that is required to support a planning application, especially in light of the new NPF4 requirements on climate and biodiversity. I would be interested to hear from you all on that. I will start with David Givan. Do you have a sense that local authorities are adopting a proportionate approach? If not, could you give us an understanding of why that is not happening, and what we would need to do to minimise the amount of supporting information that is required?

David Givan (City of Edinburgh Council): Local authorities always take a proportionate approach when they are looking at planning applications. They will look at the scale and the context when deciding the appropriate level of information to seek. When we consider what is required to have an application validated, the threshold is relatively low. What is needed to get an application determined is often different. Across the board, we take different approaches to small-scale applications. We deal with a range of applicants, from householders through to major and national developers. The level of information that we seek from them will be proportionate in relation to that and, I suppose, in relation to the shifts in policy emphasis brought about by NPF4.

We may be looking at new things or looking at things slightly differently as a result of NPF4. The nature and climate crises come to the fore through policy 1 and permeate the plan as a result.

The Convener: Morag Ferguson or Mairi Maciver, would one of you like to come in? Morag is nodding.

09:15

Morag Ferguson (Comhairle nan Eilean Siar): NPF4 has definitely increased awareness and focus on climate change and biodiversity, but it has also introduced a lot of uncertainty about what planning and planners can do and are required to do. The majority of applications in our island authority area are for small-scale and minor developments so there are challenges with proportionality and when to seek information post-validation. This is at a time when the challenges around delivering developments on the ground have become much greater and the resources and expertise that are available to small development management teams have never been so stretched.

Planning courses are not producing graduates with expertise in climate change, flood risk and biodiversity, and small authorities like ours do not have those experts in-house. Organisations such as NatureScot and the Scottish Environment Protection Agency, which have historically provided guidance, are pulling back their consultation input to focus on large projects, which is understandable.

We feel that the national policy framework has been created with large-scale development in mind, but the reality is that, in island and remote areas, the majority of applications are for small developments. It can be difficult for development management teams working at the coalface to find that balance when it comes to reading reams of policy and guidance for small-scale developments. There are exceptions for household developments, but there are probably as many, if not more, other minor-scale developments in our areas where a proportional approach needs to be taken.

The Convener: Thank you for highlighting the challenge of how, from your perspective, NPF4 focuses on larger projects and does not really meet the needs of smaller projects.

You mentioned the stretched capacity of planners and that, currently, people are not coming through with the necessary training and understanding on climate and biodiversity. I imagine that you speak with other planning authorities that are working on smaller-scale projects more consistently. Have you identified any short or medium-term solutions that we could

look at that could help with the capacity issue and provide support for taking a proportionate approach?

Morag Ferguson: There is a training aspect to it, but finding the space for in-house training is challenging at the moment. Pro formas can be developed to help staff who are less experienced to navigate the policy. However, it is the sheer scale of information. The policies themselves are voluminous and there is a lot of guidance behind them. Although there is no hierarchy of policies, the focus on biodiversity and climate change in particular—those policies are up front in the document, they have been debated a lot and they are threaded through lots of other policies as cross-cutting themes—means that they come up as high priority in the agenda for planners.

Ian Aikman: I agree with everything that Morag Ferguson said. I will pick up some of her points. Our organisation supports our membership around the country. Along with the Improvement Service and the Scottish Government, we have been looking at a range of options to provide some of that training and those skills, to share information and to do a bit of benchmarking. Earlier this year, we held an event for several hundred planning officers from around the country. There is a real demand and need for that.

We need to continue to do that because, as was mentioned, biodiversity and climate change are the lenses through which we must make our decisions. Officers must have the skills and the knowledge to both deal with and make determinations on applications. They need to engage with developers and advise them what planners require in order to make a determination. We need to be pragmatic and proportionate in respect of the information that they need to provide us with.

The Convener: It is great to hear that the training is happening. Is that sufficiently resourced to keep it going? From what Morag Ferguson said, it seems that we need that to continue.

Ian Aikman: We need an on-going programme. There needs to be more. We have made a start, and the feedback from the sessions was very positive, but we need an on-going programme to ensure that our staff have the skills.

Willie Coffey (Kilmarnock and Irvine Valley) (SNP): Good morning, everybody. I would like to ask you for your thoughts on the six broad principles of NPF4. First, though, I should perhaps remind everyone, including ourselves, what those principles are: just transition; conserving and recycling; local living; compact urban growth; rebalanced development; and rural revitalisation. Can you share with us any examples that show early signs of these broad principles being

embraced either in your local areas or in other areas that you might have knowledge of, just to give us a sense of whether we are, indeed, beginning to embrace these ideas? David, would you like to kick off?

David Givan: Over the past 20 years, perhaps, development in the city of Edinburgh has been moving towards—and, in some cases, has achieved—those principles. There has, for example, been a real focus on the principle of compact urban growth over the past 10 to 15 years, with the redevelopment of areas such as Bonnington, Leith, Fountainbridge, Quartermile and so on. Often, that redevelopment has taken the form of high-density living, but surrounded and supported by a range of different types of use. In other words, you are getting integration, which I think is really positive. Indeed, the fact that NPF4 is massively reinforcing that as a principle is important.

You can look at some of the other principles in the same way; they are helping to promote a sustainable agenda, I guess, so they are a good thing. As far as Edinburgh is concerned, though, I would see them as helping us build on what is already happening.

Ian Aikman: Perhaps I can respond from a slightly different context. As I deal with a rural area, I can pick up on rural revitalisation.

I would say that we have seen significant interest in the link between NPF4 and the Planning (Scotland) Act 2019 and the need for local place planning, and how that relates to town centres, employment mobility and connections. Perhaps I can pick up some of those themes from a south of Scotland perspective.

In Dumfries and Galloway, we are involved in what is known as team south of Scotland, in which we look at pulling together a range of opportunities through the green economy. We are also looking at housing, too, because our situation in that respect is somewhat different. A number of things have flowed from that approach, but I think that local place planning, community resilience and communities' engagement with the process will help us as we move forward. I am not saying that that has happened yet, but community aspirations will build, with the ability to feed into the next round of local development plans suggestions about what those communities want, what they need and the links that can be made in a rural context.

A number of things flow from that, too. I would just say that, with certain bits and pieces such as the principle of compact urban growth, the scale will be different in a rural context, but the focus on rural revitalisation and spatial principles will provide us with a way of developing policies and

engaging with communities. It is all about saying, “These are the things we want to see happen. What do you want to happen, and how can we work together to deliver them?” I am seeing that collaborative element coming through.

Willie Coffey: Thank you very much for that. Morag Ferguson and Mairi Maciver, can you offer a view on whether local communities are beginning to embrace these broad principles, particularly up in the Western Isles?

Mairi Maciver (Comhairle nan Eilean Siar): Coming in on the back of the previous comments, I would say that we see local place plans as a valuable tool. As you will be aware, a large percentage of our land—over 75 per cent—is already under community land or community asset ownership. We welcome the fact that the first round of local place plans is permitting existing community plans to come forward—provided, of course, that they meet the validation criteria. We already have a large established community enterprise here, and it is responding to the opportunity to have such plans.

I want to make another observation about some of the tools in the NPF, specifically the rural-urban classification. That tool has perhaps worked against us, as some parts of it conflict with our existing local development plans and spatial strategies. Moreover, it is opening up certain areas for development, simply because they are tied to geographical areas; however, those areas are not suitable for development.

Willie Coffey: Morag, do you want to come in on the question of how we are embracing the six principles in NPF4, for instance, local living and rural revitalisation? Are we beginning to see them being embraced by local communities and authorities?

Morag Ferguson: Revitalisation is a long-term ambition. Our authority is one of two with a significantly declining population, and it will take a period of time before we start to see results from NPF4. We are working with other sections of the Government, particularly on housing, given that providing housing and affordable homes is essential if there is to be a sufficient working-age population to grow and develop businesses. It will take time to bed in—it is still early days.

Willie Coffey: One or two of you have already mentioned local place plans. How do you see them ultimately influencing the LDPs that local authorities have had for many years? Are you beginning to see some influence either in your own areas or other areas that you might have knowledge of? Perhaps you could share a few thoughts about how the process will or should work.

Ian Aikman: You are looking at me, so I will just assume that you want me to come in here.

We have seen genuine enthusiasm for local place planning in the Borders. About 80 per cent of our settlements and communities have said that they are looking at engaging with this issue and at preparing a local place plan. Four such plans that are coming forward are based on borderlands towns—Hawick, Jedburgh, Eyemouth and, I think, Galashiels: how could I forget Galashiels?—and they have funding behind them. Indeed, the Hawick place plan, which is coming to council in June, is linked to a funding package. However, a number of other plans are bubbling up from a number of communities that have been very clear about their support for the process.

As for any influence on LDPs, the council has invested in a couple of local place planning officers for my team, but we also have our community planning and engagement officers, and we have been looking at creating a process of constant conversation with our communities about what they want and need. A big dialogue is happening and we cannot ignore it, so it will have to influence the plans that are coming forward.

I should say that that dialogue is part of a positive process. It is not about nimbyism or using the plans to stop things happening; instead, it is about looking at what we need to make happen. Some of that will come through the planning process, and some through other mechanisms, but the fact is that, in many cases, we are also creating a bidding document that can be used to bid for other funds, whether it be levelling-up money or whatever.

The approach is all about creating enthusiasm and building trust within communities. It is a big thing to get the trust of the communities that things will be delivered, so we are placing a big emphasis on following through. I am very encouraged by what I have seen so far in my authority with the development of local place plans and the link with place making.

09:30

Mairi Maciver: I concur with other people’s comments. Local place planning is definitely a positive tool for engaging communities in the planning process. Equally, though, we are keen to let communities know that they do not necessarily need that sort of tangible document and that there are other mechanisms that they can use to engage with the development plan process. Their engagement does not have to be formalised in that way.

For this evidence session, I tried to get a sense of what other authorities think about these matters. We have a positive north of Scotland development

plans forum where we share good practice and thoughts, and some of the feedback I have had from other rural and island authorities—I suspect that this applies across the piece with other authorities—suggests that there is still some confusion about the cut-off with local place plans. We have just had the consultation on amendments to LDPs and when they might incur a review, for example, and there is some confusion about that cut-off. Our authority has asked communities to come in with an indication about their local place plans before we move forward with our evidence report to the gate-check process, but I think that it must drift into the local plan preparation process, too. It is, as I have said, a positive tool, but we have yet to see all the benefits.

Willie Coffey: Thank you. David Givan, can you answer the same question from your perspective? After all, a local place plan in Edinburgh will be totally different to a local place plan in, say, Barra. Can you share a little bit of the contrast with us?

David Givan: We had one local place plan in the Wester Hailes area, but that was supported. Two others are under way in, I think, Queensferry and Gilmerton.

Therefore, the uptake in Edinburgh has been relatively low, when you consider the scale of the city and the size of the population. That is a concern, because I think such plans are a positive development. I see them as an iterative process, with the community looking at the plan and thinking about what it might mean and what the future might be; our taking that into account when we prepare plans; and that situation continuing as development plans themselves get replaced.

I think that communities are concerned that the documents are potentially difficult or complex to put together and that they will need support, but I do not think that it needs to be that way. The documents can be quite simple, and we should be exploring how we help communities with them. That said, they take time to prepare; the support that is available in certain communities will be different to what is available in others, and that needs to be considered, too.

Finally, there needs to be some separation between a planning authority's role in preparing the development plan and a community's role in preparing the local place plan. I would be concerned if councils, as planning authorities, were overly involved in the development of the place plans, because that might muddy the waters in the overall process. That factor needs to be considered.

Willie Coffey: I have a final question that does not, I think, encroach on questions that colleagues will ask. Do you think that all these plans and strategies—the local place plans and so on—

should play a role in how we improve the look and feel of our high streets in Scotland's towns and villages? When I talk to local people about this sort of stuff, they look at me and say, "How is that gonnae improve what we see around us? All we see are urban dereliction, empty shops and abandonment." That theme has run through our discussions on and considerations of NPF4 over the past year or so. Are people right to expect local place plans to reach into those areas to try to address and solve some of those kinds of problems? If they do not, some people, particularly those who live in urban settings, might ask, "What's the point?" Are you aware of that town centre and high street issue? How can these principles reach out and try to solve some of these things?

Ian Aikman: Perhaps I can draw on my own experience and refer to the work of Energise Galashiels Trust, some of which has been award winning. It has been looking at the challenges of decline in town centres and at a range of projects in that respect, and you have, in that one organisation, energy, action and a desire to make things better. It accepts that not everything will come through the LDP process—or, indeed, through planning in general—and that a range of partners will need to be involved in the process. Planning does play a fundamental part, but the local place plan document is used as a tool to draw in other elements.

Somebody talked earlier about the need for broader council communications. Other services in the council might be able to provide some things, but we should also be looking at other bids for funding and the use of, say, business improvement districts in town centre areas. Energise Galashiels is an enthusiastic community organisation—almost like a town team—that is looking at innovative ways of using the available tools, one of which is place planning.

However—and others have touched on this—the challenge is that not all communities have that resource to draw on. The question is how we can engage and support the communities that are less well-off and do not have the capacity to do these things themselves.

This picks up on David Givan's point, but the fact is that communities do not have to produce another development plan. They could just have a few sheets of action points to say, "Here are the things we want to see done. How do we get them done? Who do we need to contact? Who are the key owners of those areas?" That could be a focus for action. What I am saying is that they do not need to create another development plan—that is not the point.

Willie Coffey: David, do you have any perspective on this question, particularly in respect

of urban settings that local people might want to be improved?

David Givan: I echo Ian Aikman's comments about planning being part of the picture in revitalising town centres. To that extent, local place plans can have a bearing, because of their development focus.

Something else that I think will happen with local place plans is that they will go beyond development in planning terms to take in other matters. When we in planning authorities receive those plans, the onus is on us to think about what we do with them. Often, that might result in our referring them on to other service areas in councils, saying, "This is what the community has said about this area. It is not really a planning matter, but you should be aware of it." That might influence how other council services take decisions.

Willie Coffey: Okay. If there are no more requests to come in, I will thank you very much for your response to my questions.

The Convener: I call Pam Gosal, who joins us online.

Pam Gosal (West Scotland) (Con): Good morning, panel. You probably know that Scotland is experiencing a housing emergency, and you have probably heard that five councils have declared a housing emergency. Sadly, two of those councils are in my West Scotland region.

The committee has heard evidence that the best way to tackle that emergency is by increasing the supply of homes. Could brownfield sites play an important role in helping to increase the supply of homes by providing space for new developments to be built? Do you believe that NPF4 is having any impact on the willingness of developers to build on brownfield sites?

The Convener: David Givan, will you answer that question first? You might have a few brownfield sites in your portfolio.

David Givan: I will build on what I said earlier. In Edinburgh, we have a pretty good track record of developing brownfield land. As I have said, there have been a series of developments in areas such as Leith and Bonnington over the past 10, 15 to 20 years. We often see quite high-density developments with very effective use of land. That brings new people into communities who will help to support local shops and other services in areas.

There can sometimes be impacts as a result of that. We look at doctors' surgeries, schools and so on through the planning system. Because of the climate policies and the brownfield policy, NPF4 is helping to support such development, which is a very positive thing.

A range of house builders have been involved in developing brownfield land in the public sector, but particularly in the private sector. Again, that is positive, because we are getting housing with a range of tenures.

In Edinburgh, we have been achieving our 25 per cent affordable housing target. That is a very positive thing when we think about the housing emergency that the City of Edinburgh Council has declared.

The Convener: I want to bring in Morag Ferguson to see what is going on on brownfield sites in her part of Scotland.

Morag Ferguson: We do not have a huge portfolio of brownfield sites, but we have one that is starting to be developed—it is a former Royal Air Force site near Stornoway airport. We consented that coming up to two years ago. It is a 45-house development. Around the town of Stornoway, we have delivered quite a significant number of what we call large-scale developments in the past five years in particular.

One of the challenges that we see coming through for our members is that there is a desire to have facilities such as shops in those developments. However, the viability of having a local shop for that number of houses is questionable. It is a matter of getting development of the right scale that is appropriate to our environment versus developments being able to be communities in their own right.

There are not a lot of brownfield sites in the more rural areas. People tend to build on crofts. They will build a new house rather than redevelop an old one. Part of the reason for that is fiscal, because of VAT. Another part of the reason is that the challenges of retrofitting insulation to what would have been a house with a fairly small footprint will not provide a house that is desired for today's way of living.

The Convener: I think that Gordon MacDonald has a supplementary question about brownfield sites.

Gordon MacDonald (Edinburgh Pentlands) (SNP): Yes. Thank you very much, convener.

I want to ask David Givan about whether we are getting the balance right in Edinburgh between building on greenfield sites and using brownfield sites. I have been looking at that for 10 years. You are right: Edinburgh has improved the situation with brownfield sites. However, if you look at the current register of derelict and vacant land, you will see that there are still enough sites in Edinburgh to build 1,300 houses on, yet we are building on greenfield sites. We are in a country that cannot feed its population using good arable land. Are we getting the balance right?

I notice that there is a problem with identifying the ownership of a lot of the sites. How much of a difficulty is that across the country?

David Givan: I think that we are getting the balance right. We have shifted in Edinburgh. There were more greenfield releases in our most recent local development plan. There were some in the west and in the south-east of the city.

Our emerging local development plan, which has just had its examination report, has looked at land next to the A8 and between the airport and the west Edinburgh area that was already earmarked for development. That is greenfield land that is being developed. We are looking at ensuring that there are high-density developments. The number of houses that we are looking at is high, and their density is much higher than in the previous releases that I mentioned.

09:45

It is about ensuring that, where greenfield land is being used for housing, that is done in the most effective way. In west Edinburgh, the density is high, but the approach is also making use of the transport infrastructure. We have trams, heavy rail and a road network that can support public transport, including buses, as well as connections into the active travel network. I think that, to that extent, we are getting the balance right.

I have not come across land ownership issues in Edinburgh to a great degree. Mostly, the developers will be in control of their sites, and they will have assembled them by the time that they are coming into planning. Sometimes little issues emerge when we are signing section 75 legal agreements, but that has not been a major theme.

The council has looked at compulsory purchase powers for where there are little tracts of land that might prevent a development from happening. Those powers are explored and sometimes used to ensure that development can proceed. However, as I have said, that has not been a major theme.

Gordon MacDonald: The register highlights that around 18 per cent of the derelict land in Edinburgh has unknown ownership. Most of that might be in small patches.

David Givan: Right. You have made an interesting comment. That is something that I would want to take away and reflect on for the city.

Gordon MacDonald: Okay. Thank you very much.

Pam Gosal: I have a question for Ian Aikman. Obviously, it is good to hear about things that are happening in certain areas. However, what is your overall view on brownfield sites? Is NPF4

supporting developers to come forward with brownfield sites?

Ian Aikman: There is certainly a clear imperative in NPF4 to develop brownfield land. That is probably clearer now than it previously was.

On developers coming forward, you have heard about the Edinburgh context. However, outwith that context, I do not think that we have necessarily seen that. A lot of the brownfield land and vacant and derelict land is in areas in which there is real market fragility, so the ability to develop those sites and make them viable is far more challenging. That is in urban areas in the west and in rural areas.

I will give an example that we dealt with recently. We put together a scheme with a local housing provider. We put the package together and, at the last minute, it became questionable whether the vacant and derelict land funding would come through. That is a site for 30 to 40 houses in a local area, and it would have been a clear brownfield development.

There are challenges in making those sites viable, and there is a need for public investment to help to make that happen.

It is difficult to say at this stage whether more developers are coming forward in other areas. You have heard about the Edinburgh context, in which there is a clear focus on that. Where there is not that market viability and there are significant remediation costs, it is far more challenging to develop those areas.

In the Borders, historically, we have built on a lot of our former industrial past. Most of that is on river floors. Most of the villages and towns are in river valleys, so the issue is the new provisions and policies relating to flooding. That makes things even more complicated.

Pam Gosal: It was recently reported that the Scottish Government has not undertaken any internal work to calculate new build plans or projections. What, if any, evidence is there that the policy set out in NPF4 is supporting the delivery of new homes? Do you believe that the Scottish Government ought to undertake work projecting the number of homes that need to be built in Scotland?

Ian Aikman: I am struggling a little. Obviously, the focus that we have through NPF4 is the minimum all-tenure housing land requirement on housing projections, and that is the basis that we are working to. We will set aside legal cases and potential implications of that at the moment, as they are still being pondered. The MATHLR sets out what our target is, and through the development plan processes we will do a lot of

work locally to build up our evidence reports with what is required in the local context, because that will vary significantly around the country. That is work that the local authorities have been doing. On whether there is a specific need for the Scottish Government to do that, that is certainly work that we would do collaboratively with it. Clearly the focus now is on pooling together the evidence reports for the next phase of the LDP. David Givan might have more insight into that.

David Givan: We are in the same position. We are in the final stages of our current plan. The numbers for housing in NPF4 coincide with what we have in our proposed development plan, so that is a positive. The move away from some of the policies that were in the previous Scottish planning policy and so on has been helpful, and there is encouragement to support development plans, which are framing where housing should be. There is stronger support now and we are moving away from the potential of being in a planning-by-appeal situation—which we have had in Edinburgh in the past—due to the requirements around five-year housing land supply. There are a lot of positive things there.

On whether specific studies or work should be done by Government, as Ian Aikman says, that is something that we would expect to happen in collaboration with local authorities, because there is a real local dimension to all of that. If that work was to emerge, we would want to work with our counterparts in Government on that.

Gordon MacDonald: How often are housing need and demand assessed to identify the number of homes that are required in any particular council area?

David Givan: I will have to check. It is something that we do reasonably regularly. Certainly in Edinburgh, the housing needs of the city are a major focus of our work, both in the planning service and with our colleagues in housing. We work closely with them on that, but I will have to check the precise frequency with which that takes place.

Mairi Maciver: I want to come in on the point around the MATHLR approach. I appreciate that small rural and island authorities are not making a big contribution with regards to the national housing demand figures. However, the housing that we deliver in our areas is usually impactful and is a vital tool in sustaining and revitalising our communities. There has been a thought among rural and island authorities that the MATHLR tool is far too crude a measure for determining or projecting housing land requirement for our areas. There are rounding elements in it and our numbers are so small that it really does not work for us.

On the point around the HNDA, we are fortunate that we have worked very closely with our housing team. Fortuitously, it is just ahead of us in its local housing strategy and HNDA process, so we have a valid HNDA. Again, that is an argument about where the MATHLR does not work for us.

The Convener: That is helpful. I will bring in Miles Briggs with a number of questions.

Miles Briggs (Lothian) (Con): Good morning, panel, and thanks for joining us here and online today. I want to ask a question about concerns that the committee has heard about the wording of some NPF4 policies, which people have stated are unclear. Do you have any examples of where you would like to see that improved? If not, we can move on to another question.

David Givan: The wording is probably clear, but sometimes it is quite wide ranging. Policy 1, for example, is a very aspirational broad-brush policy, which permeates some of the other policies. Some of the policies are quite detailed. The planning authorities are working through the interpretation of the policies, and development plan approval is involved as well. We mentioned the flooding policy, and I think that there are particular challenges around interpretation of it. That issue can potentially be resolved by additional guidance to help with interpretation of the wording.

Ian Aikman: I agree with that. It has been a year of getting used to new things. There has probably been a fundamental change in planning policy with the Planning (Scotland) Act 2019 and NPF4, with that clear focus on climate and biodiversity, and a whole range of other things flow from that.

I do not have an issue with the clarity of the wording. Would it have been ideal to have most of the guidance come out at the same time? Yes, of course it would have been, but as planners and decision makers, we work our way through things, interpret them and come to a determination on them. I have never seen a document that is wholly consistent all the way through. Understandably, there are policies that clash against each other. That is the nature of the wide range of things that we have to deal with in a national policy.

There is a lot of context around that, so the interpretations will be slightly different in different areas, which is legitimate. Yes, we would have liked more guidance and there are areas where we are working with the Government—which has been very supportive—on not only housing but flooding, renewables implications and other things. We are working through that with Government—I think that there was a session last week in which we went through some of those questions with it. We will work through the issue and get a handle on it, but because of its nature we are learning as we

go along. Some of that will come through determinations for cases and some will be through DPA decisions, and there is willingness for us to work through many of the areas with the Government.

There are a few areas where we would like more guidance, but I think that we will get there. We are only a year in, so there is a lot to work our way through, and we are starting to do some of that. In the next year to two years, when we come back before you—others will be coming, because I am retiring soon—to say how things are progressing, hopefully they will be able to provide a more detailed picture. At the moment, we are learning. We are in a transitional period and working our way through what these things mean. As has been mentioned by various colleagues, there has been a lot of benchmarking and sharing of good practice among authorities and, as I said, Scottish Government officials have been very willing to work with us on some of the challenging and problem areas.

The Convener: It would be interesting to see how things develop a year from now. Mairi Maciver, you have indicated that you want to come in.

Mairi Maciver: Ian Aikman has covered the points that I wanted to make. Yes, some of the wording was probably looser than we would have liked. There is some use of “should” and “as far as possible”, which leaves some ambiguity or a lack of clarity for applicants and planners. Ian Aikman spoke about balancing development and the need for authorities to put weight on NPF4. Things will be clearer once a whole cycle of LDPs come in synch with NPF4. Just now, there is some conflict about the stringency of policies in LDPs as opposed to what is in NPF4.

Miles Briggs: I hope that NPF4 has not driven Ian Aikman to an early retirement, but we will leave that to one side.

David Givan touched on how NPF4 can move towards delivery of an infrastructure-first approach. Gordon MacDonald and I represent Edinburgh and the Lothians, and we have seen huge amounts of development take place with new-build homes, but not necessarily with corresponding infrastructure. Are there examples of how NPF4 might help to move towards that and whether you have seen that change?

David Givan: In Edinburgh, delivering infrastructure is very much part of what we do in the planning team at the council. We have policies and guidance that support the delivery of education infrastructure, tram contributions, transport, affordable housing and healthcare. That is part and parcel of what is already happening, and the infrastructure-first policy again helps to

strengthen that. Even the term “infrastructure first” emphasises the need for infrastructure to be in there early so that it is available when it needs to be used. In that sense, it strengthens our arm.

10:00

Miles Briggs: We are short on time, so I will ask my last question, which is potentially more for the island and rural councils. There is conflicting evidence on the balance to be struck between NPF4 protecting areas with carbon-rich soils and the development of renewable energy infrastructure. What are your views on whether or not those things are in competition? We heard in evidence that the climate and nature emergencies sometimes rub up against planning in NPF4. Do you have any views on that?

Ian Aikman: That is one of the issues that I was touching on in my last response. There are areas where policies clash against each other. The renewables policy is far more permissive than it was, and climate change is the key emphasis of policy 1.

The balance is probably more in favour of delivery of those types of projects, but it is a complex picture and it is one of the areas that we are still working our way through. I think that there is a session on this issue later on today, with colleagues in Government and colleagues from some of the rural authorities including Dumfries and Galloway, Aberdeenshire, Highland and Moray, who are dealing with it.

There is not a definitive answer. There are potential clashes, and we will see some of that play out in the decisions and cases that are coming forward. We are trying to work our way through that. Certainly, the basis of the policy is far more permissive, and therefore the challenges of opposing an application are more difficult.

Morag Ferguson: I agree with Ian Aikman. The policy is very permissive with regard to renewables development and we are in an area that is largely covered in peat, so developers are experiencing quite a challenge in meeting the policy requirements. There is a school of thought that renewable development should not happen on peat, but that is difficult when most of the land mass in the northern part of the outer Hebrides is peatlands.

It will take time. We are working with a number of developers and we are struggling through the guidance and the volume of it. There is a need to bring the guidance together, because SEPA's guidance and NatureScot's guidance are coming at the issue in two different ways. For example, under NatureScot's policy, it would be difficult to achieve reinstatement, due to the sheer scale of additional land that would be required.

The flipside of that is we are working with developers of non-renewables on the soils policy. There is a feeling that it would be unequal if major national-scale development was allowed to disturb quantities of peat and we were pressing other developers to find alternative sites to avoid peat. The methodology for dealing with peat and peat reinstatement was developed on wind farm sites and sometimes it does not carry over easily to smaller-scale developments, in terms of the plant that is required or the sheer cost of moving peat around and carrying out reinstatement. It adds quite significantly to the cost of a community-led development, for example.

The Convener: Thanks for your useful points. The challenge is that where the wind blows in Scotland there is a lot of peat.

I will bring in Gordon MacDonald with a couple of questions.

Gordon MacDonald: Thank you, convener. There are a couple of areas that I want to ask about. The first is to do with the building of quality homes. We all want good-quality homes to be built, but there is pressure on developers. I know from my case load that there have been a couple of recent new developments that have had problems. From speaking with construction guys, I hear that part of the problem is that, during winter, roofs are not tarpaulined, so the rafters get wet before the roof goes on, leading to problems later down the line. Does NPF4 support the building of quality homes and are there enough checks and balances in the systems for us to know that what developers are building is being built to the highest quality?

David Givan: NPF4 supports that through policy 16 on quality homes, the policies on design and all the other policies that support nature, positive spaces and everything else that will help to make a successful place. It does a good job and is supportive on that front. Again, it chimes with what we will do and have been doing in Edinburgh.

The construction of homes is substantially a matter for contractors and the industry; they must ensure that they build to appropriate standards and deliver good-quality construction. There is, of course, a role for building standards as verifiers through the process of reasonable inquiry, as in site inspections. However, I see that as a relatively limited role; the onus is on the contractors and the industry to ensure that buildings are being built properly.

On the big objectives around climate change, when we get to the detail of buildings, how they are built will determine whether the objectives are fulfilled. If you do not get the insulation installed right or at the right level, the house will not perform

as well. However, it is not possible for us as a planning service to enforce that, and there is a lot of challenge around that.

Clarity about what planning can do is important. In my mind, it is about the siting of development. You talked about making good-quality places and developments therefore having longevity. Planning can support all that. Building standards have a role in the detail; certainly, the development and construction industry itself has a strong role in that.

Gordon MacDonald: Given the amount of development that is happening, particularly in the east, what are the challenges that planning departments face?

Ian Aikman: In the broadest sense, the challenge is in having enough planners to deal with that; having enough planners of the right age—if, at my age, I can be ageist—and having the skills and knowledge available. The whole point about resourcing planning services to deal with current duties and with the uncosted duties that were delivered through the adoption of planning legislation is about ensuring that planning services have the right number of people with the right skills to be able to deal with applications as efficiently as possible, and ensuring that we get the good development that David Givan has referred to. That is probably the most fundamental issue that we have when it comes to the number, type and scale of applications.

We have been talking about housing but, in my authority, the most complex things that we deal with are renewables applications. That is a significant piece of our workload, and the issue is about having the skills. My key officer who dealt with such applications has just retired, so we are upskilling officers to deal with that. The point about resources, skills and knowledge is important.

Gordon MacDonald: Is there a particular difficulty in attracting planners to work for local authorities, or is it just about resource?

Ian Aikman: There is a difficulty. A lot of forums that we have been at in the past have been about planner bashing. Craig McLaren has made some of these points. I should not say this but I will say it, because I am retiring: we should have a “Hug a planner” campaign. It is a difficult job to be in because you please nobody, because there is a whole series of demands coming from different areas. How do you make that attractive?

If you talk to young people at schools, which we do when we go out to schools, you find that they are interested in the climate, the environment, what happens to rivers and building. They want somewhere to live and they want a job. Planning is about all those things, so we must be more proactive in promoting planning as a profession

and as a really interesting job with a wide variety of things that you can get involved in and make a contribution to. That is why we went into planning in the first place: to make a difference and to make a contribution to our communities. There is a series of things that we do, such as our future planners programme, but we must look at a range of options to get things done. There is an awful lot more that we could do to talk up the profession, what it is about, the influence that we have and the contribution that we can make to society and to the places where we live, work and play.

Gordon MacDonald: In the last couple of weeks, we have had the Miller Homes case ruling. What impact do you think that that will have on future developments?

Ian Aikman: Perhaps we will see some applications coming through the system now. In my view, it provides clarity, and it is a good decision. It lets us move on from the legal challenge position and lets us talk about how we deliver these sites. The reason why MATHLR was brought in, whether or not you agree with the methodology, was to get us away from the arguments about housing figures. As authorities, we spend hundreds of thousands of pounds and use time, effort and all the rest of it on arguing about numbers, when what we should be doing is working together on how to deliver houses, unpick the problems and make it work. It is about collaborative working and the joint endeavour to ensure that we deliver that. We can see the matter in a positive way, rather than it being about talking in court about numbers. Let us move forward from that.

David Givan: On resourcing, I note that planning fees have a significant role in how we can resource our services. Simple things could be done there. Linking fees to inflation and having yearly increases that we can factor in helps us to plan our resources, so that would be a useful thing.

We must bear in mind that a planning service is not just about planning applications. To make a planning decision on an application, we have to have a development plan and, if we are to have a successful planning service system, the system must be enforced. In Edinburgh, we deal with around 900 cases a year for planning enforcement, and that needs its own resource. Development planning is a continual process, and it needs resourcing. We have around 900 listed buildings in Edinburgh, and we do not receive fees for those. All that work needs to be done at a time when, no doubt, Government budgets are under pressure and, certainly, local government budgets are under significant pressure. Looking at planning fees and simple measures to increase those fees would be a positive thing for our ability to resource services.

It should also be borne in mind that planning services do a huge amount of work when we progress applications and so on but, as a proportion of a development's construction costs, the fees that we bring in are very small. In that sense, there is a big bang for the buck, so an increase in fees would be very helpful.

10:15

Morag Ferguson: Resourcing is a big challenge for rural and island authorities, and has been for a long time. Fees do not meet anything like what is required to staff a development management function, far less development plans and enforcement. However, planning is a fantastic job. It is incredibly interesting and diverse; it is a great career and there needs to be more encouragement and support to get people in.

There is a need to recognise that, when we came out of college and university, we had four or five people whom we could ask questions and learn from. Now, young people are under huge pressure. They come into departments where there is pressure to get turnaround decisions, and there is huge pressure from the sheer volume of information that we have to process. It is great to see the work that has been done by HOPS on its future planners project, but my concern is that we probably have a gap of years as people with experience move towards retirement, and the next generation coming in will need people to help them to upskill.

The Convener: Thank you very much for that. It was a sobering point to end on, but it is an important one. At the beginning of the session, the committee set out that we would like people to be excited rather than exercised by planning, and we are trying to do our bit to make sure that people understand. On the points that Ian Aikman made about young people caring about the climate and nature emergencies, having a home to live in and where the rivers flow, I note that planning offers a really important place for that.

As always, I wish that we had more time, because there were lots of tributaries that we could have delved into further. I hope that we will get a good picture from this panel of witnesses, the next one, the ones last week and some others, and I think that that is already happening. Thank you all so much for joining us. I briefly suspend the meeting to allow for a changeover of witnesses.

10:17

Meeting suspended.

10:21

On resuming—

The Convener: I welcome our witnesses on the second and final panel. We are joined by Esmé Clelland, who is the senior conservation planner at RSPB Scotland and convener of Scottish Environment LINK's LINK planning group; Claire Daly, who is head of policy and communications at Sustrans and is representing the Climate Emergency Response Group; Clare Symonds, who is the chair of Planning Democracy; and Morag Watson, who is the director for onshore wind power at Scottish Renewables.

Before we turn to questions, I want to let you know that we will try to direct our questions at specific witnesses where possible, but if you would like to come in, please indicate that to me or the clerks.

There is no need for you to operate your microphones. If you could make sure that your electronic gadgets are in silent mode, that would be great.

I will begin. I would like to understand whether you have a sense that planning authorities and developers have changed their approach to development and decision-making, in the light of NPF4 policies on climate change and biodiversity. I said that I would direct my questions specifically, so I will pass that to Claire Daly first. I know that you all have different perspectives. I have asked that initial general question; I will then ask Planning Democracy a specific question.

Claire Daly (Climate Emergency Response Group): I am speaking on behalf of the CERG. On changes in decision making, it is certainly very early days—it is too early to say. That said, we see evidence that NPF4 policy 2 is being referred to. I work at Sustrans, where NPF4 is being referred to regularly in many applications for infrastructure funding for walking, wheeling, cycling and place making. That is certainly coming through, although it is very early days.

The Convener: We hope that we will have you back—or somebody from the CERG—to talk about that a year from now. I will run along the line from Morag Watson to Esmé Clelland, then Clare Symonds, specifically on work on biodiversity.

Morag Watson (Scottish Renewables): Good morning.

We have certainly seen some changes in decision making in consenting for renewables projects. As witnesses said earlier, NPF4 is very supportive of renewable energy. We have specific examples of cases that were making their way through planning and were headed for refusal but are now being consented.

What we are seeing that is less supportive—to reiterate what was said in the previous session—is that some policies are open to interpretation, and guidance to support those policies has not yet been brought forward.

Although very supportive decisions are being made on renewables, some decisions have conditions added that are, perhaps, not based on the best available science. We heard earlier about the issues with peatlands: the peatlands guidance is not where it needs to be and is not based on the metrics that we should be using, according to science. Although NPF4 is working, the supporting guidance needs attention.

The Convener: You mentioned peatlands guidance, specifically. Is there other specific guidance that has not yet been brought forward? I know that the Government has produced quite a lot of guidance.

Morag Watson: The main one is guidance on policy 3, on biodiversity. The Scottish Government's research found that the Department for Environment, Food and Rural Affairs metric is unfit for use in Scotland, particularly in respect of how it treats peatlands, and that a Scotland-specific biodiversity metric is needed. We expect that biodiversity metric not to be available until 2025, so two years after we made biodiversity a top priority in our planning system, we still do not have an agreed way of measuring and evidencing what is being asked of people in development. There is a real hunger for that guidance to come forward.

The Convener: Thank you. Esmé Clelland, what are your thoughts and perspective from Scottish Environment LINK?

Esmé Clelland (Scottish Environment LINK): We are seeing greater consideration of NPF4. What your previous contributors, especially Ian Aikman, were saying about the move to viewing development through that lens is right. Policy 1 highlights that the global climate and nature crises should be given significant weight. It is important to remember—although sometimes we are not seeing it reflected in decisions—that policy 1 talks about the climate and nature crises. It can be a bit tricky to strike a balance between those things. Both should be considered, but perhaps the nature side is sometimes given less emphasis in reports that we see.

RSPB Scotland did a very small piece of work in which one of our volunteers looked at decisions that had been made by the DPA and the energy consents unit. Obviously that is quite a narrow type of development. In summary, there was quite a lot of variation in the way that decision makers were talking about NPF4, especially policy 3.

I absolutely agree that there is significant support for renewable energy; obviously, we need renewables to tackle the climate crisis. However, there is more uncertainty about how to tackle the other side—the nature side. There is no guidance on the metric. Development of the metric is in its early stages, but the Scottish Government guidance makes it clear that that should not stop developers delivering enhancement through their proposals. The metric is a tool for enhancement, but it is not the only way: there are, absolutely, other ways in which it can be done. I agree that the guidance could be clearer. This is about supporting local authorities in delivering what they are trying to deliver.

The Convener: Can I just come in? You are saying that on policy 1 there is uncertainty about how to respond to the nature requirements. Why is that so important? I think that people understand the climate emergency, but what is going on in nature that makes it so important and puts it at a high level and makes it the first thing that we come to when we read NPF4?

Esmé Clelland: The “State of Nature Scotland Report” is a key report that monitors the state of nature in this country. It reports declines in the abundance and diversity of nature. It is important to recognise that climate and nature are two sides of the same coin and are absolutely intertwined. What we do for nature and what we do to enhance nature will probably help to tackle the climate emergency.

How we deal with our peatlands is obviously a key aspect of that. We have a finite amount of peatlands in Scotland. They are so important in tackling climate change, but they are also very important for biodiversity and wildlife. Appropriate valuing of peatlands and measuring of the impact on peatlands are key in developments, not just in terms of the amount of carbon they hold, but in terms of habitat being lost.

The Convener: Thanks very much. I will ask the same general question of Clare Symonds, if you have anything to add. You have been doing a lot of research on biodiversity policies, so it would be interesting to get an outline of what you have been finding.

10:30

Clare Symonds (Planning Democracy): Thank you for inviting me. It is excellent that you are doing a review of the NPF4, which is a very good document. It is good to see that you are looking into whether it is being implemented, so I am pleased to be here.

We started to look at whether biodiversity policies are being implemented and how they are being implemented, largely because our network

of communities was repeatedly asking who is monitoring the enhancements, how we will know whether or not we are making a difference, how many protected sites are being concreted over, and so on.

It is important to stress the biodiversity side of things, because it seems to me that there is something of a silent crisis happening all around us. Perhaps the older ones among us can see declines in some bird populations—there are, for example, fewer lapwings and swifts. Other species are affected, too. Who knows about the Ivell’s sea anemone? It became extinct in the United Kingdom the other day and is now globally extinct, but people do not know about it. Such things are a real reason to focus on biodiversity.

We took a citizen science approach, in which we enlisted 12 volunteers from our network. I was surprised by how easy it was to do that. There was a lot of enthusiasm for trawling through planning applications, reports of handling and decision notices to see how much they had been focusing on policy 3. We looked at 347 applications from 12 local authorities, the majority of which were for local developments. Policy 3 was mentioned in 86 per cent of cases, but there was very little reference to “Developing with Nature guidance”. One concerning feature was that ecology officers and NatureScot were rarely mentioned as consultees. Only in 3.4 per cent of cases were they mentioned and conditions were only imposed in 83 applications, which was only a quarter of the cases that were examined.

It felt, from our perspective, that although consideration was being given to policy 3, that was not really resulting in a change of approach in consideration of how developments could be enhanced. Certainly, consideration of biodiversity from the outset seemed not to be being done. Applications were relying heavily on the conditions. Quite often, submission of a biodiversity plan was being asked for at the conditions stage, but we feel that that should be happening much earlier.

That work was supplemented by some of our more in-depth case studies, in which it was hard to see that biodiversity was being looked at in relation to developments at the early stages. In Potterton in Aberdeenshire, there is a proposal for 200 houses, which will impact on a groundwater-dependent ancient woodland. Despite acknowledgement that the site abounds that ancient woodland, no assessment was done by the developer of how the development will impact on the adjacent woodland and water runoff. The developer stated that the usual tree planting, nest boxes—I might go into the nest box industry, because it was the main condition [*Laughter.*]—and forming of some wetlands somehow

represented enhancement, but the developer's claims were totally unsubstantiated. It is very difficult to challenge the developer, and the community has been raising the matter at every stage from the LDP onwards. The matter has just kept on being kicked down the road to a much later stage. We really have to do something about that.

Finally, many conditions seem to be about mitigation rather than enhancement. One of the key findings was that there has been death by a thousand cuts, particularly with local developments, which were the vast majority of cases that we looked at, as I said. Often, quite sweeping statements were being made, such as that no significant impact on green space biodiversity was envisaged, so no biodiversity measures were considered. There was no proactive way of looking at the matter.

We noted that there had been a number of water vole translocations in one local authority. We wondered about the cumulative impact in that local authority area. Who was measuring how many water vole translocations were happening, because they are not always successful? What is the overall impact on that species, which is declining?

There is a need for a mindset change—a culture change, perhaps—towards being more proactive and maybe a bit more enthusiastic. I totally understand the pressures that the officers who gave evidence in the previous session are under, particularly in terms of looking at small applications. We involved communities in the assessment: I think that there is a lot of room for that collaborative approach.

I will finish on a good case. We have been working with a community in Fife. It has been working with Stirling Developments, which is bringing forward a development of 1,200 houses near Dunfermline. We are hoping that it will try to work much more collaboratively on biodiversity, as well as on other aspects of the development. Hats off to Stirling Developments: it has shared its biodiversity enhancement action plan and put the community in touch with its ecologist, so the community is really getting to look at things and is working with the developer.

The community has also formed a charity to focus on the biodiversity elements. The idea is that once the developer has left, the community will carry on and can ensure that good-quality enhancements are produced. That is a good model. It is in its very early stages and it might go pear shaped, but including the community as a partner is very important. I will leave it at that.

The Convener: Great. It is really heartening to hear that. Perhaps we will see more examples of

such models because, at the end of the day, as you said, people in those communities will be living there long after developers have gone.

I will preface my next question by saying that we might not have time for everybody to answer, although I recognise that each witness will have a different perspective, so come in if something has not been covered in the responses so far.

We have heard about the climate and nature aspects of policies. NPF4 has six basic principles, including local living, compact urban growth, the wider place principle and a just transition. Claire Daly, have those principles had any influence on the location and type of developments over the past year? I recognise that we are having this conversation quite early in the existence of NPF4.

Claire Daly: On the principles, the Climate Emergency Response Group wants the guidance to be accelerated across the board, particularly for policy 2 on climate mitigation and adaptation. That guidance needs to be brought through. It is early days, but we see a range of examples that take into account a just transition and local living. Much of that work was being done before NPF4 was completed, but NPF4 strengthens it and gives it a context.

In relation to getting the right balance in the guidance, I know that one of the earlier witnesses talked about use of the word “should” or the phrase “as much as possible” rather than the word “must”. It is very important that we recognise the local context and that we engage with local communities but, at the same time, there should be overarching guidance on biodiversity and local living, for example.

There are some very interesting examples. Earlier, we heard from the City of Edinburgh Council about some of the work that it is doing to take into account local living and ensure that people can get most of what they need within a 10 to 15-minute walk from where they live. Of course, that needs to be supported through walking, wheeling, cycling and public transport routes, so that there is reduced car dependency. That is coming through.

There are other very good examples. One of the projects that is mentioned in NPF4 is in Levenmouth, in Fife. There can be fantastic ambition with some projects, but it can be problematic when ambition meets reality and funding issues. Local authorities need the resources for planning, including, as we have heard, to get the new generation of planners up and running. There is evidence that climate and biodiversity issues are starting to be taught in architecture and planning schools. It is really important that we get the resources and the

people to provide the capacity to interact with planning.

The Convener: Would anyone else like to come in on whether the six principles are having an impact?

Clare Symonds: Policy 16, on quality housing, in NPF4 is better than the previous Scottish planning policy. However, because of the court challenges, we have not been able to see exactly how it is working and being implemented.

On compact urban growth, we have to be careful that we do not put too much focus on building our way out of a housing crisis, because that would be a very inefficient use of land, would ignore the inherent environmental impacts and would use up considerable amounts of our carbon budget. Much is made of planning being inefficient, but it is the industry development model that is inefficient. House builders want a generous supply of land, but the more generous the supply, the harder it is to plan for infrastructure and the more you plan for urban sprawl. In large-scale allocations, the drive tends to be towards low density, which often falls short of the principle of good housing and neighbourhood design.

Perhaps a key spatial principle could be to deliver only necessary and acceptable development using as little of our carbon budget as possible, while making support for habitats and ecosystems a spatial priority. There is already a lot in NPF4 about using existing stock to meet needs, but that needs to be taken more seriously. Things could be done around VAT changes and so on, as you have heard in previous sessions.

Morag Watson: The main principle that I want to talk about is the just transition. That principle is very important, and it is worth remembering the energy context that it came from. We all remember the impact that the shutting down of the coal industry in the 1980s had on communities, and that impact persists generations later. We know that our oil and gas industry is coming to an end. That industry employs one in five people in Aberdeenshire, which is my home area. Should all those jobs be lost, with nowhere for those people to go, the economic impact would be huge. Therefore, we pay very close attention to the principle of a just transition.

10:45

What is in NPF4 is very open to interpretation, which has been causing some problems. We spent 12 months negotiating with the Scottish Government on an onshore wind sector deal, which was signed in September 2023. There was a year-long process of negotiating what socioeconomic benefits onshore wind should deliver in return for meeting our climate change

targets. That was all set out. Today, we are publishing a report, which was done in collaboration with the Scottish Government, that identifies the number of jobs that we will need to create. I will need to look for the figures—it is a new publication, so I do not have them in my head yet. In 2024, about 6,900 people are employed in the sector. By 2027, we will need 20,500 people, so the sector needs to grow exponentially.

Another huge challenge relates to the great many construction contracts that are needed. The Construction Industry Training Board has looked at construction capacity in Scotland, and an additional 19,950 construction workers are needed in Scotland before 2027.

However, conditions are being placed on planning, with councils expecting payments in relation to socioeconomic benefits, when the policy was very much about creating jobs and supply chain opportunities. We have seen some strange interpretations of policy in that area.

The Convener: That is very helpful. Those are quite big figures, so we need to take a big step from where we are now with employment if we are to support the just transition aspect of NPF4.

I might be going a little bit off piste, but on my commute from my home to Edinburgh, when going through the Aberdeen area, I often encounter folks who have just come onshore or who are about to go offshore. From talking to them, I know that the job package that they get is very attractive—startlingly attractive, actually. What can the renewables sector do to attract people to the industry? I was talking to one person recently who said that the oil and gas industry is still the way to go, so there is work to be done to help people to understand the opportunities.

Morag Watson: Absolutely. The issue is that the oil and gas industry pays more—it is as black and white as that. If you already work in that industry, you probably earn 20 per cent more than you would if you were in an equivalent role in the renewables industry. The cost of energy from fossil fuels is very different from the cost of energy from renewables, which is why there is a pay discrepancy. While people have jobs in the oil and gas sector, it is very hard to attract them across to our industry. However, we know that their contracts, particularly in the supply chain, are beginning to dry up—there are no new offshore developments; no new rigs are being developed—so they are very much looking at moving into the renewables sector. Our supply chain development statement shows that 100 per cent of the supply chain companies that we spoke to had been recruiting for new roles that are focused solely on renewables.

I will give you an idea of the extent of the recruitment crisis in our industry. SSE, which is one of our biggest companies, has tripled in size in recent years. I have been with Scottish Renewables for five years. I have a team of four and have recruited 12 times in those five years, because I cannot hang on to staff long enough. Part of the planning crisis in our local authorities is caused by my members poaching planners from local authorities. We are desperate for staff, but there is a limit to what we can pay if we are to keep energy prices low. That is where the difference comes from.

We are aware that oil rigs will be decommissioned over the next 10 years. On some oil rigs, there can be crews of up to 600 people. If those 600 people lose their jobs, they will be very welcome in the renewables sector, because their skills are extremely transferable.

The Convener: Great. There is some work to be done in that regard.

Pam Gosal needs to leave before the end of the meeting, so I will bring her in to ask a couple of questions.

Pam Gosal: Good morning, panel. The committee has heard concerns that some Scottish Government agencies, including SEPA, have not adjusted to the policy priorities of NPF4. Do you share that view? If so, what action would you like such organisations to take to reflect those priorities?

Morag Watson: To reiterate a comment that was made earlier, I note that we have NPF4 and now the guidance needs to catch up with it. Peatland is beginning to become a little bit of a theme here. Under the SEPA peatland guidance, as soon as peat is moved, it is treated as waste. The idea that we have such a precious resource that we label as waste is rather out of step with where we are now. Through the Scottish Government's peatland action advisory group, that guidance is being looked at and updated, but that is the main place where we see a difference between where the agencies are at and where policy is at—there is a need for guidance to catch up.

The Convener: Does anybody have anything to add?

Esmé Clelland: Yes. I agree that it is not necessarily so much of an issue of catching up, but greater clarity in guidance would be useful. I am not sure that that is particularly a problem resulting from NPF4.

The Convener: I am sure that the chief planner and her team are very busy on that work.

Pam, do you want to come in with your other question?

Pam Gosal: The committee has heard a lot that planning departments continue to lack resources to deliver an effective planning system. Just last week, we heard from Homes for Scotland that changing the planning fees system is not the answer, especially as it does not get the adequate service that it is looking for. The Scottish Government is funding 10 bursaries at £2,000 each for students to undertake planning postgraduate degrees. Is that enough? What more can be done to increase the number of planners? Will changing the planning fees system solve the resource issues in planning?

Esmé Clelland: There is a consultation out now on resourcing the planning system, which is looking at a lot of those issues. It is a broad-ranging consultation, but it includes a lot of questions about fees. Scottish Environment LINK has always made the point that NPF4, local development plans and the whole planning system will only deliver what they are trying to deliver if they are properly resourced. Therefore, I think that the increase in planning fees makes sense.

Arguably, you can get a good service only if you have the funding for it, so it kind of works both ways. Previous contributors have made the point that, even if there was full-cost recovery for the cost of determining an application, there are other elements such as development plans and enforcement, so there is the issue of how to fund those things.

There is also the point that others have made about recognising the role that planning plays—it is not just the processing of an application; it is about how you build communities, make places and engage with the people in an area, and how you make places that people want to live and work in. Recognising the real value of planning is important. The fees potentially cannot address all those issues, but I think that a lot of developers would be prepared to pay a higher fee if that meant a properly resourced service.

I absolutely agree with the point that has been made previously that you get a big bang for your buck, given the number of people who are involved in determining a planning application and the whole process. The fees have to be reasonable and proportionate, but an increase in fees would definitely help.

Morag Watson: We totally disagree on the issue of fees and the raising of fees. We agree that the planning service should be properly resourced, but there is no direct relationship between the fees that you pay for planning and the resources that a planning department has. Planning fees are not ring fenced; they simply go into the general funding pot for a local authority. There are many calls on local authority budgets, which are deeply strapped at the moment, and

there are many statutory requirements that have first call on that money. We had a long workshop session run by Craig McLaren, the planning champion for planning improvement in Scotland, and everybody in the room identified that putting up planning fees would not improve planning unless there was ring fencing and there was a direct relationship.

Therefore, we take a very different view on the issue. We are all in agreement that my members would happily pay more if that delivered a better planning service, but the mechanism to do that at the moment is not an increase in planning fees, because that money would not go to the planning department and therefore it would not help. We have to bear it in mind that, as you put up planning fees, that puts up the cost of the electricity that our members produce. For house builders, it puts up the cost of the houses that they build. Therefore, we end up in a subsidy regime where we are adding costs across the board to energy, to homes and to other things to pay for our local authority. Our local authority budgets should increase and they should be better funded, but planning fees are not the mechanism to do it.

The Convener: To clarify, you said that you disagree, but it is not necessarily about the planning fee; it is the ring-fenced nature of the—

Morag Watson: It is the mechanism. With the current mechanism, putting up planning fees will not result in more resource for planning staff.

The Convener: No, because we need to focus it in that direction.

Clare Symonds wants to come in.

Clare Symonds: You need to define what a better service is, because if a developer pays an increased fee, does that mean that they expect the planning application to be more likely to be approved or more likely to be faster and more efficient? Alternatively, does it mean that we put more resources into biodiversity officers who can scrutinise the reports and so on? From a community point of view, where is the service for communities? Does that mean that planners will have more time to speak to them?

I agree, in that I do not have a particular problem with charging higher fees, but in many respects it would be better if funding comes from outwith local government—we should be properly funding our local authorities in many ways.

I would like to see charges for appeals. If a developer makes a planning appeal, that takes up loads of time for planning officers. Why are developers not charged for those? Why are developers even allowed to even put in reapplications? Coull Links is a good example of that—an application is already done and dusted,

has been looked at and thoroughly examined, but it then comes back a couple of years later almost exactly the same. That is a time waster, and it should not be allowed. Either make your system more efficient and get rid of those pressures on resources for the planners or start charging increased fees for reapplications and definitely for appeals.

Claire Daly: I have a quick point to add to some of what has been said. The Climate Emergency Response Group certainly welcomes the attention that has been brought to the need for resources and for capacity and skills in the planning system and the consultation that has been referred to on Scotland's planning system. However, all those solutions will take time in building the profession. Again taking a climate emergency focus, we would call for interim measures that could be brought in quickly to plug the gap. For example, we could have regional hubs that draw on expertise or have shared resourcing measures. As I said, we are seeing evidence of NPF4, climate emergency and biodiversity starting to be taught in architecture and planning schools but, in the meantime, given that we have a climate emergency, what can we do? That might be one quick win.

The Convener: The point about regional hubs certainly came up at some point when we were doing work on NPF4 last year.

11:00

Gordon MacDonald: I want to ask about the wording of some of the NPF4 policies. We heard evidence last week that suggested that policy 3 on biodiversity is too loosely written, but that, on the other hand, in policy 22, the flood risk issue being very rigidly interpreted. Could the interpretation being either too loose or too rigid lead to inconsistent decision making? If so, how do we address that problem—is it all about the guidance?

The Convener: Who wants to pick that up?

Gordon MacDonald: Maybe Esmé Clelland can go first?

Esmé Clelland: In part, it is about the guidance. There is nothing inherently wrong with the wording of policy 3, in that it asks for biodiversity enhancement, but a lot of questions follow on from that. How much is enough? How much is “demonstrably better”? How long does it have to be in place for? How is it secured? How do you calculate it? There are all those things to consider.

The guidance was not in place for larger developments when the policy came into effect, which has been a big issue. I think that local authorities are trying to find a way through that. To a certain degree, it is inevitable that there will be

differences in interpretation depending on the local authority and what suits it best. Highland Council is geographically huge compared to Clackmannanshire, for example, so what is appropriate for each authority will be very different. The draft guidance that is out now from the Government is a start. It will be revised and I think that it will need to be tweaked when we have learned more from what is happening.

It comes down to having the expertise, as well. If you have an in-house expert who can advise on ecology, it obviously makes it a lot easier for planners; it is also easier if you have that strategic backing for the policy. NPF4 talks a lot about nature networks and about policy 3 supporting those nature networks. Once the local authority has that in place, if you then have something which maybe points to where there are opportunities for biodiversity enhancement or if you have a local biodiversity action plan, a lot of the heavy lifting is, arguably, done before the development even comes in.

It comes back to that infrastructure-first approach, as well. If you are looking at nature networks, if the green and blue infrastructure is there, your developments are all feeding into that. It is really helpful if you have those things in place. Again, it will take time. The nature networks are still being rolled out and people are still trying to understand what they mean, but I think that having those tools will make it a lot easier in the future.

I do not think that there is anything wrong with there being different interpretations in different local authorities. What is important is that policy applies to all the developments that it should apply to and that we are ensuring that it is implemented, monitored and enforced.

In policy 3, there is an exemption for householders, which absolutely makes sense, but there is also an exemption for aquaculture. As I understand it, that exemption was justified by the fact that aquaculture is addressed through regional marine plans, but these are not yet in place. Guidance on how planners interpret how those kinds of developments can contribute to biodiversity as well would be useful.

Gordon MacDonald: Claire Daly, do you want to come in on that? I notice that you are taking some notes.

Claire Daly: Yes. On the point about the wording, we certainly agree that there is ambiguity. Maybe that is fine but, for example, on delivery of policy 1, there is the statement that

“Policy 1 gives significant weight to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions.”

What is meant by “significant” there? What is “significant weight”?

I think that Morag Ferguson from Comhairle nan Eilean Siar said that the term “as far as possible” is used a lot. For example,

“Policy 2 will ensure that emissions from new development are minimised as far as possible.”

This is where we get into the realm of “should” rather than “must”.

We look forward to guidance for policy 2 on mitigation and adaptation because the planning and climate change guidance will set an unequivocal signal for developers; there will be a presumption that permission will not be granted for developments that lock in high-carbon behaviours or developments that fail to incorporate adaptation to climate impacts in their design.

At the moment we are still getting housing developments that are low density and promote suburbanisation. From a Sustrans point of view, those are the very things that create car dependency. There is a huge opportunity if we can look at housing and plan for less car use, which is something that CERG would agree with in relation to our town and city transformation proposals. For example, you can build at just slightly higher densities nearer to city centres with excellent active travel and public transport links. You need fewer car-parking spaces, so you can build at slightly higher densities but also have green space, areas for urban biodiversity, a play space for children and, fundamentally, liveability. There are huge opportunities, but again this is something that we hope would be considered in guidance.

Gordon MacDonald: But will guidance be enough to address those issues?

Claire Daly: That is the question. We cannot go with anything other than guidance but, for developers, I think that the feeling is that if there is a level playing field and if all their competitors are doing the same as them, it becomes a fairer ask. Clarity in the guidance will be one of the most important things. We need more direction and more clarity. Again, if similar standards are being used, it is easier to compare and also to aggregate. The CERG would be advocating a net zero test. If there is similar measurement in developments, it is easier to aggregate the overall benefits of a policy and the carbon emission reductions that are down to a policy.

Morag Watson: I will move on to a slightly different policy—policy 6, on forestry and woodland. There is a specific issue with this that was not addressed at the time of NPF4, which is to do with two specific members: our network energy companies in Scotland. We have SSEN in the north of Scotland and Scottish Power Energy Networks in the south of Scotland.

The issue is to do with ancient woodland. We agree that it is an irreplaceable habitat and that it must be protected, but these are regulated businesses and there is a legal obligation for them to connect anyone who wishes to be connected to the electricity grid. Under the regulation of Office of Gas and Electricity Markets, you must do that at the smallest reasonable cost and, because these are long linear features, they unavoidably from time to time come into contact with ancient woodlands. Therefore, we would ask for a change to the wording of NPF4. SSEN has sent written evidence to the committee. This statement is taken from that evidence and we fully endorse and support it:

“Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.

We would argue that a change in the wording is needed for the very specific reason that no one in our country should be refused access to electricity. It is a policy that we need to balance out. We have a precedent for this. When SSEN had to come into contact with ancient woodlands down in Argyll, a very effective strategy was put in place. SSEN worked with the local community groups to enhance biodiversity across the area, but with the acknowledgement that there was some impact on an ancient woodland.

Gordon MacDonald: My final question is for you, Morag. Last week, we heard that there are particular challenges in the Highlands. As you highlighted, there is a need to develop renewable energy infrastructure there, but that would have to be done on carbon-rich soil. How do we get the balance right between protecting those areas and allowing development?

Morag Watson: It will be helpful to clarify what we need. We have blanket bogs, peatland, carbon-rich soil and peatland areas, and they are not all the same thing. When there is a proposal to put a renewables development in an area, a very thorough peatland survey is done. Protected areas aside, peatlands on renewables sites are probably better mapped than in any other parts of Scotland. The legislation is very clear: you cannot build on deep peat, or anywhere where there are active blanket bogs—where the peat is still accumulating and active—but that represents only about 20 per cent of Scotland’s peatlands; 80 per cent of them are degraded and damaged.

It is standard practice in renewables development that, having done a peatland survey and an environmental impact assessment, the carbon calculator is used to calculate whether the carbon saved and the carbon released balance out. A peatland management plan is then put in

place. We microsite our infrastructure to avoid all the deep peat. Anywhere there is an active blanket bog, we will not even touch. We will have done a hydrological survey of the site to check how the water flows might change and we will put in measures such as floating tracks, so that we do not dig down into the water courses and change the water flow and so on. Those are all the standard measures that we would take. We are working, through the peatland expert advisory group, with the Scottish Government to bring the peatland guidance up to date because it is a little out of date and out of step with the advice in NPF4. That is the way it is done.

I should also say that it is simply part of renewables development that, if you have peatland on your site, you do peatland restoration. Our industry spends millions on that. One example is Whitelee wind farm just outside Glasgow, which is owned by Scottish Power Renewables and is one of Scotland’s largest wind farms. Under NPF4, Scottish Power Renewables would be expected to do about 10 per cent compensation measures, but it did 40 per cent. When it came to the peatlands, it just restored everything that it could restore. Again, there is on-going monitoring to check that those peatland measures work. What happens on renewables sites, because of the way that the industry has developed, is very different from what would happen, for example, on a housing site.

Esmé Clelland: I think that there is an issue. As people have said, where there is a lot of wind, there tends to be a lot of peat, especially in the north of Scotland. Although there are policies about avoiding peat, it is not quite clear cut as to what deep peat is and that it is always avoided. There are significant impacts on peatland and that is recognised in decisions. The John Muir Trust submission to the committee mentioned the decision to grant the Energy Isles wind farm application. That decision recognised that there would be impacts on peat. That was balanced and the decision was that the contribution in renewables was acceptable. It is quite a difficult balance to make and assess.

I understand that work is being done on the carbon calculator because it is recognised that there are issues with the calculator that need to be resolved and it needs to be revised. We absolutely support the work that is being done on that to make sure that there is a proper carbon audit so that informed decisions can be made. The policy wording asks that development

“optimises the contribution of the area to greenhouse gas emissions reductions targets”.

Without a proper calculator, it is very difficult to strike that balance.

11:15

The other issue is that it is about not just carbon, but the habitat; the peatland is supporting species and is part of that habitat.

I absolutely agree that the renewables industry is, in some areas, doing huge amounts of peatland restoration. Finding areas to do that in can be quite challenging—I think that SSEN's submission talks about not having control over land and land ownership issues. Those are all valid points. There is obviously variation among developers, but we have certainly seen really good examples of the willingness to do restoration and to look at good practice in restoration. Ultimately, if you can avoid it in the first place that is obviously better, but it is quite difficult.

An issue that is, arguably, becoming an increasing problem is that wind farms are determined without considering the infrastructure that is needed and has to be provided once they are consented. If you have a wind farm proposal coming in, it will not show the transmission lines that connect it to the national grid, although there is recognition that if a wind farm is consented, SSEN or SPEN will be obliged to make that connection. If you have a wind farm that is very carefully sited to avoid peat but is surrounded by great peatland or ancient woodland and all those other habitats, when the connections come to be made, and they are obliged to be made, that can cause additional problems. If we are going back to an infrastructure-first approach, it would be very useful to take that into account when wind farm developments are considered, because a lot of the issues are coming through the infrastructure, as well as the wind farms.

Gordon MacDonald: Morag Watson wants to come back before we come to Clare Symonds.

Morag Watson: I need to make a correction, because what Esmé said is not correct. Nobody would develop a wind farm unless they had a very clear understanding of how the grid connection would be, because otherwise you would have built an asset without a route to sell your electricity. Although there is an obligation for the power company to connect you to the grid, you have to pay for that grid connection. If you were to go through a sensitive habitat—it is unlikely that you would get permission for that—you would have to route around it and grid connections are eye-wateringly expensive. A grid connection can cost more than the construction of a wind farm, so to say that that is not taken into consideration is not correct. It is a very prime consideration before building a wind farm.

Esmé Clelland: I am not saying the developer has not considered that at all, but it is not a requirement to show the grid connection on the

proposal. We are seeing examples where the connections then have to go through a very sensitive habitat. I am not saying that anyone intends or wants to do that, but it is correct that connections are being made through very sensitive habitats and we can give you examples of current applications that show that.

Gordon MacDonald: Clare Symonds, do you have anything to add?

Clare Symonds: Just a quick point. The natural places policy principles are very clear that

“Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.”

Who makes that assessment of whether or not it is unacceptable? It is usually the applicant themselves and I think that that is a weakness in the system that needs to be rectified. The applicant is then required to make a community benefit statement, which the community have absolutely no say in. They have no scrutiny process for that community benefit statement, and I think that is a weakness, because it is almost like an advert for the developer to say, “Look at what we are doing,” but it is absolutely not open to scrutiny from the community.

Morag Watson: Again, that is factually incorrect. Community benefit is not a material consideration in planning; it is a voluntary contribution. There is national guidance around consultation with communities, which was developed with Local Energy Scotland, that everybody is expected to follow. Likewise, when it comes to the assessment of whether there is an unacceptable environmental impact, you must hire somebody who is accredited as an independent ecologist to assess that. They must put together evidence, that evidence must be submitted to NatureScot and NatureScot will scrutinise that evidence to see whether or not it stands up. It is not simply a case of the developer saying, “No, there is no significant impact” and everybody just accepting that. That is not the way it happens in planning.

The Convener: Thanks very much. I will bring in Miles Briggs with a couple of questions.

Miles Briggs: Good morning to the panel. I want to ask about NPF4 policies that encourage developers to build on brownfield sites and what else can be done to help support that. Specifically, we have heard concerns around decontamination costs. What impact has NPF4 made and is there anything that you want to put on the record on that?

Clare Symonds: There is perhaps a need to tackle the high land values of brownfield sites and maybe provide subsidies and incentives to help to regenerate the land. Public investment could be

provided to prepare such sites for development by buying up land at the existing use value and selling it to the house builders. That moves the profit incentive from extractive land value to encouraging a system where the markets compete on what is built and the quality of the build, rather than making their profits on the rise in land values. That should lead to better-quality housing.

The Scottish Land Commission has done a lot on that, but we have to address the fundamental problems of land values. I believe that it was a manifesto commitment and I think that we have cross-party agreement on that now. It is a bit of a missed opportunity that the Land Reform (Scotland) Bill has not tackled that land value capture aspect, as that might have helped to incentivise more brownfield development.

Miles Briggs: If no one wants to add to that, I will move on to the delivery of the infrastructure-first approach that is part of NPF4, and specifically whether or not there have been any changes around that. Here in Edinburgh, the west Edinburgh green network has specifically looked to embed walking and cycling connections for the developments that will grow to the west of the city.

Also—I will maybe bring Morag in—there is the grid upgrade and renewables projects that are coming forward. Housing may be one of the biggest workforce problems. What work is going on that is not necessarily outlined in NPF4, but the industry is taking forward?

The Convener: Before anyone responds, I will say that we have to keep our questions and answers brief.

Morag Watson: We will need over £20 billion of grid infrastructure upgrades to make a network that is fit for net zero. Those applications are not due to come into the planning system until this year. An issue that we have highlighted is the capacity of the planning system to deal with them. It is too soon to tell how that will play out in the planning system.

On housing issues, again in line with SSEN's submission, 9,000 extra staff will be needed to deliver all this. It is already in negotiation with housing associations in Highland Council to build 200 houses that will be used, probably for about three to four years to house its workforce, and then turned over to the housing associations to provide additional housing. Those are serious issues of concern, but it is too soon to know how they are playing out in the planning system.

The Convener: Claire Daly, did you indicate that you wanted to come in?

Claire Daly: I made a point earlier about looking differently at densities and the infrastructure-first approach. We had been seeing that prior to NPF4

anyway, but NPF4 strengthens and consolidates it. Looking at how we create public transport, active travel links and local infrastructure—schools and green spaces—will certainly help. Going back to your previous point about brownfield sites, rethinking where housing is located can have a very positive impact.

Willie Coffey: Morag, something that you said earlier really struck me. When you were talking about just transition, you referred to the coal mining era and what happened in Scotland in the 1980s and you compared that with the just transition in the north-east that we are experiencing. There was no just transition in the 1980s. It was basically a “like it or lump it” transition, was it not? Words like “local place plan” were not in the lexicon then for many communities in Scotland. We just did not think in that way. I am glad that we are now using that language.

I would like to get some final thoughts from all of you about how local place plans are developing. Are they working? Are they beginning to work? Are we seeing the fruits of those plans? Can I get some ideas from you on that? I ask Morag to comment first, as I mentioned her.

Morag Watson: The renewables industry does not particularly get involved in local place plans. We tend to be somewhat more remote from communities. However, we put community benefit into communities. In recent years—I am checking my figures—we have put £108 million into communities, and a lot of that money is paid to things such as local development trusts to support them to have the capacity to engage in these things. You heard from the previous panel about the capacity of communities to bring forward plans. Under the good practice guidance for community benefit, one of the key things that we do is support communities to help them with their plans and then with funding their delivery.

Willie Coffey: Do others on the panel want to comment on local place plans? Are they working? Are they beginning to emerge? How do you see them influencing local development plans?

Clare Symonds: I wonder how many local place plans are needed in an area in order to influence the local development plan. For example, if people wanted to change the policy on purpose-built student accommodation in Edinburgh, how many local place plans would have to agree on that in order for it to be included in the local development plan? At the moment, we do not have enough to make that judgment. The Planning (Scotland) Act 2019 requires a review of local place plans after seven years, which will be in 2026. Maybe that should be scheduled into your timetable.

The feedback that we are getting on the timing—this maybe explains why there are not so many local place plans in Edinburgh—is that people find it really hard to engage in the local development plan process at the same time as trying to deliver a local place plan. It is usually the same people who are interested in planning, and they are trying to get to grips with NPF4 as well so that they take account of that. It is just overwhelming for people. There is an important point about the timetable for the process and how to fit all those things in.

Claire Daly: The development of local place plans is certainly a significant stage in the process of implementing NPF4. It is an opportunity for policy to be properly localised and a great opportunity to consult and involve communities. However, as we heard earlier from some of the local government officials, we are still in the early days. The fact that there are only three local place plans in Edinburgh is revealing, but perhaps that will improve in time.

Esmé Clelland: I do not have much to add. There are great opportunities, but we will have to wait and see how they play out. It would be really interesting whether the Scottish Government is able to do a review to see how the plans are working before seven years have passed, in order to identify what issues there are and whether there are any barriers to people taking part.

On the point about just transition, it is absolutely right to note the opportunities that renewables present. A lot of things go along with that, including the wider biodiversity policies and the requirements for more habitat management plans, more peatland restoration and the other jobs that run through the environmental work. However, that is long-term work that will be done over a number of years; it is not just a matter of going in and doing it. It relates to just transition, but also to everything that potentially flows from that.

Willie Coffey: We have touched on the fact that one of the six spatial principles is rural revitalisation. Claire Daly talked from Sustrans's point of view about making town centre urban developments accessible so that we do not need cars, but what about rural settings? I would appreciate a few comments about that. Is NPF4 strong enough to support and encourage sustainable rural development, and particularly community-led housing?

Morag Watson: One of the key things about the renewables industry is that it is dispersed across Scotland and it brings jobs and long-term well-paying professions to remote and rural parts of Scotland. We can see the impact that oil and gas had in the north-east of Scotland and the affluence that exists there. As part of a just transition, we seek to have that affluence spread around

Scotland—on the islands, up in the Highlands, in Dumfries and Galloway and out in Argyll, which are all places where we are offering jobs. We are currently looking for welders in the Highlands at £75,000 a year and we cannot get them, so if anybody is looking to retrain, they may want to note that. Another key thing that we have a huge demand for is people to do the peatland restoration. We do not have enough professionals who can do that.

Our just transition, our energy transition and tackling the climate emergency are not separate things. They will all combine to be a good news story for our rural areas if we can bring them all together in a co-ordinated way.

Clare Symonds: I agree with what Ailsa Raeburn from Community Land Scotland said. Communities have to deliver quite a lot of the developments in rural areas and they are very outcome focused. That should be applauded and supported as much as possible.

The Convener: Again, I feel that we have just scratched the surface of the topic, but I hope that we will get a fuller picture from hearing from all our panels. Thanks so much for joining us this morning. It has been really helpful.

I will suspend the meeting briefly to allow our witnesses to leave the room.

11:33

Meeting suspended.

11:35

On resuming—

Subordinate Legislation

Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2024 (SSI 2024/102)

The Convener: The next agenda item is to further consider a negative Scottish statutory instrument. There is no requirement for the committee to make any recommendation on a negative instrument, but I am interested to hear any comments on the amendment order. Do members have any comments?

Members: No.

The Convener: It is noted that this is the last phase of the Scottish Government's permitted development rights review. It is suggested that the committee may wish to write to the Scottish Government asking it to set out its next steps and what it intends to do to consider the impact of the changes made through the three phases of the review. Do members agree that we should write to the Scottish Government in those terms?

Members *indicated agreement.*

The Convener: Does the committee otherwise agree that we do not wish to make any recommendation on the amendment order?

Members *indicated agreement.*

The Convener: Thank you. We previously agreed to take the next three items in private. As that was the last public item on our agenda, I close the public part of the meeting.

11:36

Meeting continued in private until 11:39.

This is a draft *Official Report* and is subject to correction between publication and archiving, which will take place no later than 35 working days after the date of the meeting. The most up-to-date version is available here:
www.parliament.scot/officialreport

Members and other meeting participants who wish to suggest corrections to their contributions should contact the Official Report.

Official Report
Room T2.20
Scottish Parliament
Edinburgh
EH99 1SP

Email: official.report@parliament.scot
Telephone: 0131 348 5447
Fax: 0131 348 5423

The deadline for corrections to this edition is:

Monday 17 June 2024

Published in Edinburgh by the Scottish Parliamentary Corporate Body, the Scottish Parliament, Edinburgh, EH99 1SP

All documents are available on
the Scottish Parliament website at:

www.parliament.scot

Information on non-endorsed print suppliers
is available here:

www.parliament.scot/documents

For information on the Scottish Parliament contact
Public Information on:

Telephone: 0131 348 5000

Textphone: 0800 092 7100

Email: sp.info@parliament.scot

