

## Questions - Part 1 – A National Spatial Strategy for Scotland 2045

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

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

No.

We welcome the recognition of the climate emergency and biodiversity crisis throughout NPF4, however, we do not consider that NPF4 will contribute sufficiently to tackling these.

Throughout the document there is a systematic underplaying of the causes and extent of the climate emergency and a concomitant overstating of the impact of relatively minor actions.

There is for example, no mention of the need to tackle agricultural emissions (e.g. from livestock, fertiliser, ploughing, etc) which make a very significant contribution to Scotland's GHG totals; however there are no less than seven references to woodland creation and peatland restoration. Whilst both these are important – and for more than just climate reasons – but their potential contribution to achieving net zero by 2045 is limited: any woodlands not yet planted will barely be in credit, carbon-wise, by then.

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

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

No

Again, we welcome the aspirations in the draft NPF4 but do not consider there is sufficient action to deliver.

We recognise the superficial attraction of the 20-minute neighbourhood concept, at least as it pertains to the ~80% of Scots living in settlements of >4,000 people, but it lacks the recognition that major obstacles are behavioural, particularly weddedness to cars. Merely providing more options will not deliver significant change.

For the other 20%, and particularly the 10% living outwith settlements of 500 or more people, very significant changes are needed in housing quality, transport and energy infrastructure to facilitate "living well locally".

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

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

No

The commitments to a wellbeing economy and community wealth building are welcome but the proposed approach seems ill-suited to delivering these aspirations. As with the disappointing National Strategy for Economic Transformation the limit of ambition appears to be to mitigate the worst impacts of growing inequality rather than tackling root causes.

There are, for example, a couple of references to mitigating the impact of second home ownership, but no attempt to reduce the problem, despite the widely recognised deleterious effects on communities, especially in rural areas and the impact on reaching net zero. (Second home ownership impacts significantly on overall housing demand and therefore increases overall GHG emissions).

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

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

No

Again we welcome the aspiration, and the recognition of existing inequalities, but this section seems to yoke together a range of separate issues from environment to equalities without any coherence as to what's actually intended by way of action.

5 Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

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

No – see answers to Q1-4

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

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

7 Spatial Strategy Action Areas. Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?:

We understand the intention behind the regional subdivisions but

a) The 5 areas identified are themselves very large and diverse: most notably the “central urban transformation” area which includes substantial rural areas

b) There is a tendency to zone certain activities or types of development (nature networks, active and shared transport networks etc) to specific action areas when they should be priorities everywhere

In all the area profiles the descriptions of current GHG balances significantly underplays the scale of the problem

8 North and west coastal innovation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

9 North and west coastal innovation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area? :

Action 2: There is a certain irony in including whisky production in the “wellbeing economy” section, and interesting that it is only referenced for this region, which is responsible for <5% of Scottish production. The industry is certainly economically important and valuable for its predominantly foreign owners, but has significant environmental and social disbenefits as well having a major negative impact on food security. Likewise the farmed salmon industry has very significant environmental disbenefits. These are important sectors locally but the draft NPF4 underplays the need to radically transform them if they are to play any positive role in a net zero economy or nature recovery.

10 Northern revitalisation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

We are unclear what is meant by “climate sequestration”

The assertion that the area is a “net carbon sink overall” is not supported by official figures

The assertion that “many communities have taken ownership of their land and this could form the foundations for future development” is misleading: many communities have taken ownership of specific parcels of land – often for very specific purposes - but few if any in this region (Knoydart may be the one exception) have control of all or most of “their” land. NPF4 should recognise and support the need for the significant increases in community land acquisition that will be required to facilitate community led and owned projects.

11 Northern revitalisation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

Action 5: “Strengthen networks of resilient communities” is rather vague and intangible: “Build community wealth and climate resilience” would be a much stronger formulation.

Action 7: the area does have a key role to play but the greatest contribution here, as in other regions, will be by reducing emissions from agriculture, particularly livestock. There isn't time for future woodlands to make a significant contribution to reducing emissions by 2045, and touting such activity as an “investment opportunity” seems designed to increase extraction of profit from the region.

12 North east transition. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

Land use does not provide carbon sequestration

13 North east transition. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

14 Central urban transformation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area? :

15 Central urban transformation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area? :

As with other areas it will take more than the expansion of active travel networks to deliver significant change in transport patterns.

16 Southern sustainability. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

17 Southern sustainability. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

Action 24: "The South of Scotland Regional Land Use Pilot is providing significant opportunity to work with landowners, landed interests, and others to look at the multi-benefits from land use and to maximise natural capital opportunities"

The widespread perception of the Regional Land Use Plan process, first initiated more than a decade ago in the 2011 Land Use Strategy, is that it is a very effective way of appearing to talk about tackling an issue that no-one in Government actually wants to have to tackle. It's possible that it may provide significant opportunity in the future, but it's not possible to say it is doing this at present.

We note that "landed interests" and "landowner" are generally taken as synonymous. This suggests that decisions about the use of land are expected to remain the preserve of a small, heavily subsidised group of wealthy people, with some undefined contribution from some undefined "others".

Action 25: It is disappointing to read that "Further work is required to build the case for improvements to public transport routes."

18 National Spatial Strategy. What are your overall views on this proposed national spatial strategy?

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

We support the recognition of the importance of tackling the climate emergency and the commitment to support community wealth building, but there is very little demonstration of urgency to deliver either.

Much stronger policies are required, not just to provide lower-carbon choices but to reduce car traffic.

There should be a presumption in favour of community-led development where proposals will build significant community wealth.

## Questions - Part 2 - National developments

19 Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?

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

20 Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

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

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

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

## Questions - Part 3 – National Planning Policy

22 Sustainable Places. We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

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

Yes, we agree with the principles but consider the wording re stakeholder and local communities to be rather passive. This could be rephrased as "This must involve stakeholders and local communities in creating liveable, healthier and sustainable places..."

23 Policy 1: Plan-led approach to sustainable development. Do you agree with this policy approach?

Do you agree with this policy approach?:

24 Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

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

25 Policy 3: Nature crisis. Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

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

We do not agree that applications for farmed fish or shellfish development should be excluded from the requirement to include appropriate measures to enhance biodiversity.

26 Policy 4: Human rights and equality. Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

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

27 Policy 5: Community wealth building. Do you agree that planning policy should support community wealth building, and does this policy deliver this?

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

We agree that NPF4 should support community wealth building; however, this policy needs to be strengthened to deliver this, with priority outcomes for community wealth building and objectives specified.

There should be a presumption in favour of community-led or owned development proposals where these will contribute significantly to community wealth building

28 Policy 6: Design, quality and place. Do you agree that this policy will enable the planning system to promote design, quality and place?

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

29 Policy 7: Local living. Do you agree that this policy sufficiently addresses the need to support local living?

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

We agree with the principle of locating services as close as possible to users, and opportunities to do this via community led action should be a priority. However, the 20 minute neighbourhood is an urban and somewhat arbitrary concept which does not translate well to achieving sustainable rural development.

We also agree that active travel for daily needs should be supported, however, making this a reality will take more than providing a few more choices: many in urban areas already have such options but uptake is very sparse.

30 Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

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

31 Policy 9: Quality homes. Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

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

We support the plan-led approach to housing in principle, however, the current market and plan led approaches and traditional Housing Need and Demand Analysis are not providing the housing needed in many rural areas: a new solution is urgently required. There should be a presumption in favour of community-led proposals with significant community wealth building outcomes

Tackling second home ownership (rather than merely trying to offset its worst effects) will help reduce losses in the available housing stock.

32 Policy 10: Sustainable transport. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

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

33 Policy 11: heat and cooling.Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

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

34 Policy 12: Blue and green infrastructure, play and sport.Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

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

35 Policy 13: Sustainable flood risk and water management.Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?

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

36 Policies 14 and 15 – Health, wellbeing and safety.Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

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

37 Policy 16 – land and premises for business and employment.Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

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

### Questions - Part 3 - National Planning Policy continued

38 Policy 17: Sustainable tourism.Do you agree that this policy will help to inspire people to visit scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

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

39 Policy 18: Culture and creativity.Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

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

40 Policy 19: Green energyDo you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?

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

41 Policy 20: Zero waste.Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

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

42 Policy 21: Aquaculture.Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?

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

43 Policy 22: Minerals.Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

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

44 Policy 23: Digital infrastructure.Do you agree that this policy ensures all of our places will be digitally connected?

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

45 Policies 24 to 27 – Distinctive places. Do you agree that these policies will ensure Scotland's places will support low carbon urban living?

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

46 Policy 28: Historic assets and places. Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings?

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

47 Policy 29: Urban edges and the green belt. Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

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

We welcome the reference to community woodlands in Policy 29b, although we note that community woodlands are relevant across all of Scotland, not just the green belt. Successful implementation of this policy will require that policy (and local interpretation) is supportive of the wide range of projects / developments that community woodlands wish to take forward to build community wealth

Currently community owners are frequently disadvantaged in the planning system because a) planners don't regard many community activities or projects as "appropriate" in a woodland setting and b) communities aren't considered to have mainstream agricultural or forestry objectives so often can't use permitted development rights to facilitate operations (a farmer may dig a pond to water stock under PDR but these don't cover a community group wishing to create a pond for biodiversity purposes).

48 Policy 30: Vacant and derelict land. Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

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

49 Policy 31: Rural places. Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

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

50 Policy 32: Natural places. Do you agree that this policy will protect and restore natural places?

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

No. NPF4 should understand conservation as a cooperative balance of natural and human use, rather than invoking an externally imposed, subjective and inappropriate concept of "wildness". Section 32 i) should be deleted in its entirety.

51 Policy 33: Peat and carbon rich soils. Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

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

It is unclear why particular industries, however apparently important, should be allowed to develop new or expand existing peat extraction operations.

Control of development on peatland is welcome but the plan text omits to mention that the majority of Scottish peatland is in a degraded condition due to past and current land-use (including muirburn and maintenance of excessive deer numbers) – unless these are addressed this policy will have only very limited effect in protecting and preserving peatlands.

52 Policy 34 – Trees, woodland and forestry. Do you agree that this policy will expand woodland cover and protect existing woodland?

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

Policy 34c (Q52) is very welcome but needs clarification that "significant and clearly defined additional public benefits" includes community wealth building as well as environmental benefits. Currently under the Control of Woodland Removal policy a landowner with an environmental pretext can effectively remove as much woodland as they want without a requirement for compensatory planting but it is very challenging for a community to make even tiny areas (<0.5ha) available for forest buildings, woodland crofts, etc.

53 Policy 35: Coasts. Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

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

## Questions - Part 4 - Delivering our spatial strategy

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

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

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

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

#### Questions - Part 5 - Annexes

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

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

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

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

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

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

#### Questions - Integrated Impact Assessments

59 Environmental Report. What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? :

60 Environmental Report. What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.

What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.:

61 Environmental Report. What are your views on the potential health effects of the proposed national developments as set out in the environmental report?

What are your views on the potential health effects of the proposed national developments as set out in the environmental report?:

62 Environmental Report. What are your views on the assessment of alternatives as set out in the environmental report?

What are your views on the assessment of alternatives as set out in the environmental report?:

63 Environmental Report. What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?:

64 Society and Equalities Impact Assessment. What are your views on the evidence and information to inform the society and equalities impact assessment?

What are your views on the evidence and information to inform the society and equalities impact assessment?:

65 Society and Equalities Impact Assessment. Do you have any comments on the findings of the equalities impact assessment?

Do you have any comments on the findings of the equalities impact assessment?:

66 Society and Equalities Impact Assessment. Do you have any comments on the findings of the children's rights and wellbeing impact assessment?

Do you have any comments on the findings of the children's rights and wellbeing impact assessment?:

67 Society and Equalities Impact Assessment. Do you have any comments on the fairer Scotland duty and the draft NPF4?

Do you have any comments on the fairer Scotland duty and the draft NPF4?:

68 Society and Equalities Impact Assessment. Do you have any comments on the consideration of human rights and the draft NPF4?

Do you have any comments on the consideration of human rights and the draft NPF4?:

Do you have any comments on the consideration of human rights and the draft NPF4?:

69 Society and Equalities Impact Assessment.Do you have any comments on the islands impact assessment?

Do you have any comments on the islands impact assessment?:

70 Business and Regulatory Impact Assessment.Do you have any comments on the partial business and regulatory impact assessment?

Do you have any comments on the partial business and regulatory impact assessment? :

## About you

What is your name?

Name:

Jon Hollingdale

What is your email address?

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jon@communitywoods.org

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Community Woodlands Association

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.: