

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?:

We agree that sustainable places should be a key priority, and that achieving net zero should be a central aim of the NPF4.

Low-carbon and zero-carbon design, sustainable transport and renewable energy are vital elements for achieving these aims, and our main suggestion would be to emphasise these as requirements, or conditions, for sustainable planning, rather than as things to be encouraged.

The approach should also make a clear statement that planning which will undermine Scotland's aim of achieving net zero should be avoided, such as high/medium-carbon design, unsustainable transport and fossil-fuel energy.

In our response to the next section on Liveable Places, we highlight the role community and third sector organisations played in the emergency response to the Covid-19 pandemic. The approach to achieving sustainable places should build these sectors in as having a crucial part to play in a successful and just transition to net zero.

This goes further than simply engaging with already-active groups and charities. Although, community activism around climate change is already strong in Scotland, communities not already engaged, who are often the most affected by climate change and actions to prevent it, require support to contribute to planning and take positive action. This is especially true in our disadvantaged communities where there are fewer resources and existing organisation is thinner on the ground. There should be a recognition of the need for support and proactive engagement with marginalised and disadvantaged communities.

If community climate hubs are to contribute to planning for sustainable places, they need to be community-led, with support to represent diversity and involve wider, more marginalised groups. They also need to be given adequate power to control, utilise and protect local resources.

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?:

We support this focus, but the approach to achieving this needs to elaborate on what is meant by "empower[ing] more people to share their places." In addition to advocating planning for empowerment, the approach needs to emphasise, or explain, how communities will be empowered to participate in planning.

Building on the reference in this section to the social legacy of COVID-19, perhaps the biggest opportunity arising out of the Covid-19 pandemic is that of potentially enabling voluntary and community organisations to have as great a voice as possible in decision-making and planning.

The community-led response to COVID-19 demonstrated what many already knew; that community organisations have knowledge of, and reach into, their communities that enables them to respond to local needs and priorities. They are best placed to know what interventions are required now, and in the future, and have a first-hand understanding of how different policies, planning and decisions will affect the people they work with.

We say more about how communities can be empowered to participate in planning throughout the rest of this response, including: using the National Standards for Community Engagement; capacity building for communities and professionals working in planning; adopting innovative methods used in participatory democracy (e.g. citizens juries and assemblies); and supporting and engaging with community-led action plans.

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?:

We see this section as using the right language, such as 'building a wellbeing economy' and 'green investment' without making the adequate connections between the issues. For instance, the headline statement could be strengthened by stating clearly that we will attract new investment, build business confidence, stimulate entrepreneurship, and facilitate future ways of working where these improve social and environmental wellbeing.

Similarly, it should be made clear that other activities such as supporting businesses, playing to economic strengths, and encouraging development that supports the prosperity of key sectors should be carried out where these improve social and environmental wellbeing.

Otherwise, there potentially could be a conflict between economic growth for short-term gain and genuine sustainable development, transition to net zero and a wellbeing economy.

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?:

We welcome the reference to place-making, but there should be an accompanying reference to community-led approaches, which are key to ensuring that places reflect the priorities of those who live in them.

Sustainable planning, place-based approaches (including local place plans) and community-wealth building can be effective in helping to build sustainable and, indeed, distinctive communities if they are accompanied by good community engagement informed by the National Standards for Community Engagement and community capacity building support to ensure all groups in the community are empowered to take 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?:

In order to deliver on this, the spatial strategy as a whole needs to be clear on how people, particularly those in marginalised communities where community organisation is fragile and there are fewer resources, will be empowered to shape planning and have more control over what happens in, and to, their communities.

Sustainable planning, place-based approaches and community-wealth building can be effective in helping to build sustainable and, indeed, distinctive communities if they are accompanied by good community engagement informed by the National Standards for Community Engagement and community capacity building support to ensure all groups in the community are empowered to take action.

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?:

We broadly support these principles as a set of key considerations for guiding good planning decisions. However, as with the sections above, the principles should be strengthened in terms of community participation and influence in planning, including support for those who are less able to take part.

Following on from what we have said about the importance of participation and empowerment already, the voice of communities is essential if the other principles are to be adhered to. This is particularly true for disadvantaged and marginalised communities, who are disproportionately adversely impacted on by planning.

One way of addressing this would be to add another principle around participation and empowerment, in which planning will reflect the priorities of the people who are affected by it. There is some recognition of the value of participation in the Just Transition principle (principle f) but a separate principle would ensure that the wider principles are founded on good engagement and support for every community to take part.

Participation is key to achieving much of what the strategy contains, and should be given more emphasis throughout. There is too often a presumption that local and affected communities will act as a barrier to progressive planning. However, where this has happened there has often been a lack of good engagement, support and communication when planning decisions have been made. There is evidence that by working with communities and supporting them to take part in informed from an early stage, decisions and planning can be improved.

For example, deliberative democracy has shown its potential to generate and provide support for the brave policy decisions required to move away from a focus on economic growth towards prioritising wellbeing. SCDC was directly involved in the Citizen's Assembly of Scotland, which prioritised actions around sustainability and tackling poverty. Through informed deliberative dialogue, assembly members were able to weigh up the different policy considerations at stake and prioritised longer-term wellbeing over short-term growth.

A further example is lived experience panels, in which community members who are worst affected by bad planning decisions, yet have the least influence over them, are supported to contribute meaningfully to planning processes. Scottish Community Development Centre is currently setting up a lived experience panel to co-design Glasgow City Region's Capital Investment Health Inequalities Impact Assessment Tool as part of the Economies for Healthier Lives programme. The tool will then be tested on a small number of capital projects, including a £9m housing energy retrofit project and the proposed Glasgow Metro project.

Led by Glasgow City Region Programme Management Office, the project aims to ensure that capital investment in the area supports reducing health inequalities and improving health and wellbeing outcomes for people who live and work in the region. Find out more at <https://www.health.org.uk/funding-and-partnerships/programmes/capital-investment-health-inequalities-impact-assessment>

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 can see good reasons for having geographical action areas, as each area will present different challenges and will have different priorities from each other. However, setting out the priorities for each area in the planning framework is the wrong approach in our view. A better approach would be to set out key outcomes, or planning priorities, for Scotland and then support local discussions with all sectors, but with community participation at the centre, on how to achieve these priorities.

This approach would address the fact that planning in every area Scotland needs to address the key challenges facing Scotland, not just the areas which are affected worst by these challenges. For example, planning in every part of Scotland has to help the country achieve net zero, not just the areas worst affected by flooding.

Similarly, planning in every part of Scotland must prioritise reducing inequality, whether this is about affordable transport, housing, education or jobs. Not only do inequalities exist in all parts of Scotland, but planning in one part of Scotland can affect inequalities in another. For instance, unaffordable or inadequate public transport links can limit who is able to commute longer distances for work.

We would rather leave commenting on the specific priorities set out for each area to those based in those areas, and ideally this would be a case of using some of the approaches outlined in our comments on participation.

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? :

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?:

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?:

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?:

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? :

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?:

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?:

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?:

We are generally supportive of all the national developments, and particularly the Central Scotland Green Network and the National Walking, Cycling and Wheeling Network. All of these areas could do with more indication of community participation and involvement and how this can be supported.

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?:

Yes, short clear statements linking to national priorities such as sustainable development, reduction or carbon emissions, health and wellbeing and employment should be more than enough. Statements should be accessible and relevant to all stakeholders involved.

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, at a time when the need for urgent action to prevent catastrophic climate change has never been greater, anything less would be unacceptable. As we have said elsewhere, we recommend that NPF4 goes further and, and, as far as possible, makes sustainability a condition of planning.

In addition, we agree that the planning system should apply the Place Principle as stated, but would like to see this more explicitly highlighted and referenced throughout not only this section but the whole document.

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

Do you agree with this policy approach?:

We welcome the reference here to Part 1 of the Community Empowerment Act and the UN Sustainable Development Goals.

A more appropriate title for this policy would be "outcome-focused approach to sustainable development". This would reduce any likelihood that planning for sustainable development is tokenistic and in name only. By planning in an outcome-focused way, local development plans for management and use of land are more likely to achieve sustainable development in the long-term public interest, and not be side-tracked by short-term considerations.

We also think that this policy should stipulate that local development plans are required to utilise the National Standards for Community Engagement. This is partly due to the need to engage with those affected by planning in order for it to meet their interests. But it is also important to recognise that the process of public participation in planning also leads to positive outcomes that indirectly contribute to sustainable development. These include increases in health and wellbeing, connectedness and trust in public institutions.

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? :

To help ensure it is taken into account, the policy needs to clearly state that sustainability and reducing carbon emissions are integral to any development being in the long-term public interest.

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? :

Without having the experience and expertise in this area to make substantive comments, we support any policy that leads to increased protection of the natural environment. However, the reason for excluding particular types of application (such as fish farming) needs to be provided in order to maintain trust in the integrity of the policy more widely.

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?:

Respecting, protecting and fulfilling human rights is integral to planning. To ensure the policy effectively addresses this need, and also that it helps achieve the other policies in this section, the policy should be strengthened as follows:

- A clear statement should be made that planning should only be carried out and supported where human rights and equality are promoted, protected and fully taken into account.
- Reference should be made to the National Standards for Community Engagement, which are not statutory requirements in themselves, but are recognised within a range of wider legislation, and by a range of public bodies, as good-practice principles designed to improve and guide the process of community engagement. They are a way to ensure that engagement is early, collaborative, meaningful and includes all groups likely to be affected.
- We would also expect to see a requirement to conduct an equality impact assessment where appropriate, in addition to ensuring planning adheres to the Fairer Scotland Duty.
- This would be an ideal place to emphasise the importance of bottom-up participation, as opposed to top-down engagement such as consultation. Where community-led action plans, local place plans and other community-led efforts to engage (including participation requests) exist, these should be welcomed and integrated into planning at an early stage.
- There should be a requirement for planning departments to build their own capacity, bringing in support where required, to understand and carry out effective community engagement that addresses inequality and promotes equality and human rights.

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?:

The policy should emphasise the importance of ensuring good community engagement is at the heart of any people-centred approach and/or community wealth building. This could be achieved by cross-referring to a strengthened policy 4, as outlined above.

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?:

An inclusive and design-led approach requires that good community engagement is built into any development proposals. Again, this could be achieved by cross-referring to a strengthened policy 4.

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? :

This section touches on the importance of community involvement in planning, but too strong a focus on one relatively new approach, such as 20-minute neighbourhoods, risks missing some of the fundamental considerations of participation, involvement and empowerment.

For instance, a key element of any place-based approach is meaningful and early participation of communities. It seems like an obvious thing to point out, but the people who live in, work in and use a place are the most knowledgeable about what makes a place suitable for them. They need to be given more say in how places are planned and developed, including the facilities and services they prioritise locally.

Most importantly, any approach used needs to support marginalised and disadvantaged communities to fully participate. This support can be provided in the following ways:

- The National Standards for Community Engagement should be a key resource in developing town centres, as it can help ensure engagement is inclusive, well-planned and effective.
- Supporting community-led approaches to planning and identifying priorities, including community-led action plans, local place plans, participation requests and community-led action research.
- Ensuring the above community-led approaches are built into planning structures and carefully taken into account of.
- Working in partnership with third sector organisations and community organisations who already support and engage with marginalised and disadvantaged groups.
- Supporting planners, decision makers and other relevant officials to understand, support and respond to community-led approaches.
- Recognising that development planning is not always the starting point for communities in terms of priorities.

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?:

As it currently reads, there is a risk that the approach, as well as the jargon, could alienate people and create barriers to participation. The policy states that it is based on “providing clarity over infrastructure requirements and their planned delivery to meet the needs of communities”. This should be strengthened to emphasise the need to communicate any policy priorities in plain English and work closely with local communities, groups and organisations to come to a consensus about why infrastructure is key, what this means, and what type of infrastructure should be prioritised.

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?:

Yes, in so far as there is an emphasis on the environment, fairness, equality, inclusion, 20-minute neighbourhoods, housing for marginalised groups, affordability and statements of community benefit for larger developments.

We know from much of our work across Scotland that housing developments and the provision of affordable (including social), quality, energy efficient housing is a key issue in many communities. It is therefore an area where good quality, meaningful and early engagement can pay dividends in terms of understanding community priorities, addressing inequality, promoting equality and avoiding potential conflict.

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?:

This policy has the right emphasis, including the mode hierarchy and not investing where existing infrastructure is sufficient, and this may help it to achieve its stated aim. Some ways to strengthen the policy are:

- The first sentence of section (a) should be changed to “Local development plans should aim to reduce the need to travel unsustainably. They should prioritise locations for future development that can be accessed by sustainable modes.”
- The 4th sentence of section (b) should read “The spatial strategy should adhere to the sustainable travel hierarchy and transport investment hierarchy by making best use of existing infrastructure and services and also help to deliver 20 minute neighbourhoods”
- There needs to be a statement or section to the effect that planning applications and development proposals should demonstrate how they have involved communities using and affected by transport networks in the development of these plans.

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?:

This is another policy that would have more chance of achieving its aim if a clear statement was made that community engagement is required. This seems especially important to sections (c), (d) and (e) in which plans are likely to have an impact on environmental, physical and mental wellbeing.

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?:

We broadly support this policy, and think it could be strengthened by making explicit connections to other policy areas, such as climate change, housing, transport and local living, all of which have direct links to health and wellbeing, with inequality in those areas contributing to health inequalities.

In addition to promoting food growing and allotments, proposals that include space for wider community activity should be supported. The concept of community-led health is based on the understanding that most community-led activity and organisations have health and wellbeing benefits. More on this can be found at www.chex.org.uk.

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 energy. 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?

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?:

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?:

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? :

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?:

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?:

We would like to see the reference to local place plans strengthened, by adding a statement to the effect that partners involved in creating Local Development Plans should not only adhere to local place plans but actively encourage and support these. Other types of community-led plans should also be promoted, supported and actively sought out. This includes community action plans which will often include community priorities and recommended actions in relation to planning. It is important that the onus for bottom-up planning isn't placed squarely on communities, particularly communities who are marginalised, less skilled in engaging with planning and worst affected by poor planning decisions.

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?:

We support the notion of a collaborative approach involving communities. However, there needs to be a lot more on how communities, particularly disadvantaged and marginalised communities, are supported to contribute at a strategic level.

The list of strategic partners and aligning policies risks setting the NPF4 up for more 'business as usual'. We would ideally like to see an ambitious change in direction, including the establishment of a high-level steering or advisory group tasked with engaging with diverse and under-represented voices. The group would include a range of people with roles in relation to areas ranging from equality and inequality through to climate change and depopulation in rural areas.

The group could be established along the lines of other participatory approaches and lived-experience panels such as the National Taskforce for Human Rights Leadership <https://www.gov.scot/groups/national-taskforce-for-human-rights-leadership/>.

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? :

The statement we are most interested in is in relation to (d) improving equality and eliminating discrimination. As we have said elsewhere (e.g. in relation to policies 4,5 and 7 in the Policy section), the success in tackling inequality, promoting equality and human rights, and ensuring places are liveable and sustainable is all contingent on meaningful and early engagement and support to involve and empower disadvantaged and marginalised groups. We have suggested ways in which this might be done throughout our response and recommend that the NPF4 incorporate them if it genuinely aims to make planning more sustainable, fair and participatory.

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:

Andrew Paterson

What is your email address?

Email:

andrew@scdc.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Scottish Community Development Centre

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?:

Very dissatisfied

Please enter comments here.:

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

Slightly dissatisfied

Please enter comments here.: