

T: 0300 244 4000  
E: [scottish.ministers@gov.scot](mailto:scottish.ministers@gov.scot)

Ariane Burgess MSP  
Local Government, Housing and Planning  
Committee

Sent via email to:  
[localgov.committee@parliament.scot](mailto:localgov.committee@parliament.scot)  
Cc: [Euan.Donald@parliament.scot](mailto:Euan.Donald@parliament.scot)

Our ref: A49795711  
30 August 2024

Dear Convener,

Thank you for your continued work and input on the delivery of National Planning Framework 4 (NPF4). In May, I appreciated the opportunity to provide evidence to you on the work we have undertaken to implement NPF4.

I am writing by way of response to your letter of 26 June 2024. I thank you for your feedback and have taken on board the questions you raised. I trust that this is a helpful update on our ongoing work in this phase of delivery.

**Resourcing the planning system** remains a priority. We are progressing work at pace to improve capacity in planning authorities. Our consultation 'Investing in Planning', which closed on 31 May, included a range of proposals aiming to ensure that Scotland's planning services have the resources and the skills at their disposal to support delivery of much-needed investment in our places. We have now published the responses to the consultation along with a summary of those responses. I will set out the next steps on improvements to the planning system when Parliament returns after recess.

The National Planning Improvement Champion plays a vital role in supporting continual improvement within the planning system. The Champion is piloting a new approach to monitoring **performance** of the system and has now introduced the [National Planning Improvement Framework \(NPIF\)](#) which is bringing a renewed focus on improvement, measuring quality, identifying the attributes of a high performing planning authority, recognising dependencies and resources. The Champion has taken forward the new framework with the first cohort of planning authorities, with the second cohort beginning this month.

I fully understand the concerns raised across sectors around **infrastructure**. NPF4 is clear that the infrastructure-first approach is key to a plan-led system and should be central to informing the new round of Local Development Plans (LDPs). The committee will appreciate

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

that planning authorities are at the early stages of preparing these LDPs, but it is encouraging that work is underway across Scotland now; so far four evidence reports have now been submitted to an independent Gate Check. One authority's report has resulted in recommendations that additional evidence is required to support a more robust plan, and one authority has been notified that they are able to progress with their plan. The process is still ongoing for the other two plans, and a number of others are expected to progress to submission later this year.

We continue to reinforce that **new style LDPs** must be based on a robust evidence base, including on infrastructure capacity and condition. Following up on a session with authorities on Evidence Reports at the end of last year, we are planning a second later this year, to share experiences and learn lessons. Key aspects of that will be around proportionality, infrastructure first, key agency involvement and housing matters.

I appreciate the concerns you flag around **statutory consultees** and their role in the planning process. I recognise the vital role they play in our system and will be meeting with Key Agency chief executives in September, when we will discuss the resource pressures faced by agencies, their role in addressing the housing emergency but also the importance of a collaborative, whole-systems approach going forward. The Key Agencies Group continues to engage positively with my officials and planning authorities.

At the committee meeting in May, officials indicated we would provide comment on housing matters, following a Court of Session judgement. This and declaration of the **housing emergency** led to a letter being issued by myself and the Chief Planner. The letter promotes a positive approach to planning for homes, and recognises the benefits that quality homes and places can bring. Whilst it noted that planning is just one of many factors that impact on delivery of housing, it confirmed that planning must play its part. It provided clarification on implementation of NPF4, highlighted the significance of diversifying tenure to meet the needs of communities, and emphasised the need for a positive and constructive dialogue across sectors to support delivery.

The letter committed to a number of actions where we would work in partnership with stakeholders, including on housing need, SME housebuilders and statements of community benefit. It also indicated we would reconvene the Joint Planning and Housing Ministerial Roundtable following the summer recess. Alongside the aforementioned letter, a letter was sent to planning authorities requiring them to update local development plan action programmes, to become delivery programmes. This will support the implementation of NPF4 and a pipeline of deliverable housing land.

The cross sector Planning, Infrastructure and Place Advisory Group, has also covered housing related matters, in a range of settings including large scale housing development, town centres and rural development, with the August 2024 discussion focusing on the reuse of vacant and derelict land. Members of the group have explored solutions to infrastructure challenges including the use of guarantees and other funding models, and examples of effective partnership working to support delivery. I understand that the group will bring together its findings to date and produce an annual report early next year.

In addition, digital officials are supporting planning officials to plan and implement improvements to key **data** across several NPF4 priority areas, including housing. These improvements include conducting a review of the available data on planning and housing

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)

**INVESTORS IN PEOPLE**<sup>™</sup>  
We invest in people Silver



and developing an analytical platform to bring together and visualise currently available data, including data on planning land allocations, planning approvals and housing completions.

Regarding the new **biodiversity** requirements in NPF4, we continue to welcome feedback on how Policy 3 is being implemented across Scotland and on how guidance is assisting implementation and delivery. We have had further contact with Planning Democracy in advance of a one-on-one meeting to further discuss their work on this. In early 2024 NatureScot commenced work to develop an adapted biodiversity metric suitable for use in supporting delivery of NPF4 policy 3b. This included publication of a Key Issues paper which was consulted on throughout April and early May. NatureScot are now reviewing the responses received and will publish further updates on their webpages in due course.

To inform the preparation of new **planning and climate change** guidance, we commissioned research to identify relevant information sources, tools, methods and approaches that can be used to demonstrate whether and how lifecycle greenhouse gas emissions of development proposals have been minimised, aligned with National Planning Policy. The research was published on 9 July<sup>1</sup> and the findings will support an approach that is both proportionate and applicable to the broad range in both nature and scale of development proposals considered through the planning system.

We have established a short life working group to encourage a **proportionate** approach to assessments required for planning applications. The initial scoping meeting has set out the group's intention to use feedback from practitioners and authorities to identify priority areas for improvement and opportunities for increased proportionality and streamlining. The group will work towards identifying and sharing best practice, to help improve certainty and consistency across the system.

As the Committee notes, concerns have been raised by stakeholders about tensions between delivery of Policy 22 on **flooding** objectives and wider NPF4 objectives, such as the redevelopment of brownfield land and town-centre regeneration. NPF4 policies should be read and applied as a whole and conflicts between policies are normal and to be expected. However, we recognise that a changing climate combined with historic land use patterns and competing land use demands is leading to complexity and challenging decision-making.

We have brought together colleagues from across the Scottish Government, planning authorities, SEPA, and relevant professional bodies to discuss this further and we are also engaging with industry. In the meantime, SEPA has recently published new and updated [guidance](#)<sup>2</sup> to support NPF4 delivery which has been developed with input from planning authorities, Scottish Government and wider delivery partners. SEPA continue to welcome comments on their guidance, and will update this further as practice continues to bed-in.

Policy 5 on **soils** recognises the critical role that peat and carbon rich soils have to play in helping to achieve net-zero by 2045, through sequestering and storing carbon. The Scottish Government has established a Peatland Expert Advisory Group (PEAG), bringing together industry, academia, the public sector and environmental experts to provide advice on how we can deliver on both our peatland restoration and onshore wind ambitions. The group was formed in June 2023 and is intended to exist for 2 years. There have been four meetings so

---

<sup>1</sup> [Planning and climate change guidance: research report issue 3 - gov.scot \(www.gov.scot\)](#)

<sup>2</sup> see "Standing Advice for Planning Authorities"; "Flood Risk and Land Use Vulnerability Guidance"; and the SEPA Position Statement on Development Protected by Formal Flood Protection Schemes";

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

far, with the fifth meeting scheduled for August and output from the PEAG will be used to inform future policy and guidance.

As for our work on various other issues you mention, such as masterplan consent areas (MCA), compulsory purchase orders (CPO) and the infrastructure levy, we continue to make good progress. On **MCAs**, we are in the process of finalising regulations and guidance, with a view to them being in force by the end of the year. On **CPO**, we are working with the practitioner advisory group and a range of stakeholders to explore options and develop proposals for change, with a view to a launching a public consultation on a comprehensive reform package in 2025. With regard to the **infrastructure levy**, a discussion paper was published in June and we are actively engaging with a wide range of stakeholders to seek their views; subject to the feedback received, our intention is to consult on draft regulations next spring.

I agree that **community** voices must inform the planning system. Our existing guidance on local development planning includes information about engagement in the local development plan making process and we anticipate finalisation of the 'Effective Community Engagement in Local Development Planning Guidance' later this year. Recognising the importance of building capacity within communities to engage in planning processes, our provision of core funding for Planning Aid Scotland (PAS) supports promotion of their free advice service and work to increase the capacity of community groups across Scotland, including those who are seldom heard and communities experiencing deprivation. PAS also provide specific guidance and resources for community delivery of Local Place Plans. While there is support and guidance available, we continue to emphasise that just as every place and community is different, every Local Place Plan will also be different, and the process can be adapted to local expertise and resources.

Recognising the importance of planning being informed by a wide range of voices, the Scottish Government and leading practitioners have also been promoting gender sensitive planning approaches, with a practical workshop having been held in Glasgow on 22 August. Our guidance on 'Local Living and 20 Minute Neighbourhoods'<sup>3</sup> supports communities and others to understand and implement the approach that can create thriving, positive places that help tackle structural inequalities and support a high quality of life.

We committed to update the NPF **Delivery Programme** annually from autumn last year. The next update is scheduled to be published later this autumn and I will ensure the Committee is alerted to its publication.

I trust that this update is helpful and look forward to continuing to work with you as delivery of NPF4 progresses.

Yours sincerely,

**Ivan McKee MSP**

---

<sup>3</sup> [Local living and 20 minute neighbourhoods: planning guidance - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/local-living-and-20-minute-neighbourhoods/planning-guidance/pages/1-to-3.aspx)

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](https://www.lobbying.scot)