



OFFICIAL REPORT
AITHISG OIFIGEIL

Local Government, Housing and Planning Committee

Tuesday 8 February 2022

Session 6



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Tuesday 8 February 2022

CONTENTS

	Col.
DECISION ON TAKING BUSINESS IN PRIVATE	1
NATIONAL PLANNING FRAMEWORK 4.....	2

LOCAL GOVERNMENT, HOUSING AND PLANNING COMMITTEE
5th Meeting 2022, Session 6

CONVENER

*Ariane Burgess (Highlands and Islands) (Green)

DEPUTY CONVENER

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

COMMITTEE MEMBERS

*Miles Briggs (Lothian) (Con)

*Graeme Dey (Angus South) (SNP)

*Meghan Gallacher (Central Scotland) (Con)

*Mark Griffin (Central Scotland) (Lab)

*Paul McLennan (East Lothian) (SNP)

*attended

THE FOLLOWING ALSO PARTICIPATED:

David Dunne (Aberdeen City Council)

Pam Ewen (Heads of Planning Scotland)

Councillor Steven Heddle (Convention of Scottish Local Authorities)

Craig Iles (South Ayrshire Council)

Calum Lindsay (Convention of Scottish Local Authorities)

Iain McDiarmid (Shetland Islands Council)

Sarah Shaw (Glasgow City Council)

Jane Tennant (Royal Town Planning Institute Scottish Young Planners Network)

CLERK TO THE COMMITTEE

Euan Donald

LOCATION

Committee Room 6

Scottish Parliament

Local Government, Housing and Planning Committee

Tuesday 8 February 2022

[The Convener opened the meeting at 09:30]

Decision on Taking Business in Private

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

Agenda item 1 is a decision on taking business in private. Do members agree to take items 3, 4, 5 and 6 in private? Item 3 relates to the committee's approach to further consideration of understanding barriers to local elected office; item 4 is consideration of our approach to the Good Food Nation (Scotland) Bill; item 5 is a chance for the committee to agree its approach to new standards for fire alarms in all homes in Scotland; and item 6 is consideration of our approach to scrutiny of the Building Safety Bill legislative consent memorandum.

Members indicated agreement.

National Planning Framework 4

09:31

The Convener: Agenda item 2 is the fourth of our five evidence-taking sessions on the draft fourth national planning framework, or NPF4. The focus of the session is on local government issues. On 22 February, we will hear from the minister.

I welcome to the meeting Councillor Steven Heddle, environment and economy spokesperson, and Calum Lindsay, policy manager in environment and economy, both representing the Convention of Scottish Local Authorities; David Dunne, interim chief officer in strategic place planning at Aberdeen City Council; Craig Iles, service lead in planning and building standards at South Ayrshire Council; Pam Ewen, head of planning at Fife Council and chair of Heads of Planning Scotland; Sarah Shaw, head of planning neighbourhoods in regeneration and sustainability at Glasgow City Council; Iain McDiarmid, executive manager for planning at Shetland Islands Council; and Jane Tennant, chair of the Royal Town Planning Institute Scottish young planners network. Thank you for joining us.

We will move straight to questions. If any of our witnesses wishes to respond or contribute to the discussion, they should put an R in the chat box. There are quite a few of you, which is fantastic. We tend to direct our questions to one or two people initially, but if you feel that you have something important to say or highlight in response to a question or to bring into the conversation, please join in—unless, of course, the point has already been made. We have only 90 minutes for this session, and I might have to cut people off and move on to another question. I hope that that is okay.

Witnesses have repeatedly raised with us concerns about the vague language in the draft NPF4. Do you share those views? What language do you think needs to be improved or revisited to ensure that NPF4 delivers positive and concrete outcomes for our local communities? Perhaps I can start with Pam Ewen, because of what she has said in her written submission, and then go to Jane Tennant and Sarah Shaw.

Pam Ewen (Heads of Planning Scotland): Good morning, convener. Heads of Planning Scotland—or HOPS, as it is often referred to—is the representative organisation for senior planning officers from Scotland's planning authorities.

You mention one of the clear challenges of the draft document that we set out in our interim response. We have raised concerns about the

fragility of the draft policies as currently—*[Inaudible.]*

It is often subtle differences in wording that are critical to how NPF4 will be delivered. One issue that we have raised is that, if the Government considers that addressing climate change needs a real step change in how our places are developed and how they grow, the NPF must require such policy change with no ambiguity.

We have to remember that we are debating a draft document and it is rare, if ever, that a draft of such a complex document gets it right first time. That is the whole point of the debate and the engagement that is on-going. However, the policy wording is too loose and imprecise. It will not stand up to rigorous and forensic legal challenge. That will really weaken the opportunity to drive change through the policy intentions that are evident in the draft NPF4.

HOPS believes that we need, collectively, to strengthen confidence in the planning system and make sure that the policies are robust, so that we do not end up with lots of appeals and legal challenges. We note that the Society of Local Authority Lawyers and Administrators in Scotland and the Law Society of Scotland also support those points.

Lastly, there are lots of words—I will not go through them all—that need to be defined. What are “good, green jobs”? What is “high quality”? What are “great places”? Lots of people who have given evidence have drawn on that. Heads of Planning will be happy to continue working with the Government to work through some of those finer points.

The Convener: Thank you. It was helpful to get some specific examples such as “good, green jobs”. What, indeed, does that actually mean?

Jane Tennant (Royal Town Planning Institute Scottish Young Planners Network): I am chair of the Scottish young planners network. Young planners are planners in the first 10 years of their career, post qualification. It will be for us to take the plan forward towards the end of its timescale.

I echo Pam Ewen’s point about ambiguity and legal challenges over wording. In particular, what is meant by words such as “significant” or “unacceptable”? Thresholds require to be built in, particularly when the plan talks about lifetime carbon. It needs a framework of what is required over the next five years and then in five to 10 years. What are we looking at in terms of that being “significant”?

Also, for things such as “community wealth building”, we can read the theory and understand it, but there are potential problems in the subjective application of the objectives, leading to

a legal challenge off the back of that. We need to make sure that criteria and thresholds are built in.

The Convener: Once again, I am grateful for your specific examples on that point. Lastly, does Sarah Shaw want to come in on that question?

Sarah Shaw (Glasgow City Council): Thanks. I am head of planning at Glasgow City Council. I will echo what the previous speakers said. Some of the newer policies in NPF4, in particular, require some clarification and clearer wording. As Jane Tennant mentioned, policies that have been introduced to address the climate crisis talk about “significant emissions” and “unacceptable impacts”, but that is extremely vague. They are new policies and new policy areas that planners will have to apply, so we need clarity on that.

Also, in some of the policies relating to the nature crisis and natural places, there are a number of areas where the document talks about “protecting” and “identifying” networks. It refers again to “acceptable impacts” and to “biodiversity gain”, but there is no guidance on that. We would have welcomed some overt linking to the NatureScot guidance that is coming through to give that status. Otherwise, every council will apply those requirements in an individual way and there will be inconsistency across the board.

Some of the policies are quite precise, but certain areas need firming up. We will make a more detailed response on those particular areas.

The Convener: Thank you, Sarah. You raise another issue that has been identified to us, around linking the framework to existing policies.

Graeme Dey (Angus South) (SNP): Just to be absolutely clear, and for the record, is the plea that, in that context, the word “may” should be replaced by “shall” or “must” in every instance in the draft, or are witnesses suggesting that there may be some areas in which retaining that vagueness would be welcome?

Pam Ewen: Unfortunately, it is not as straightforward as that. We need to look at which policies in NPF4 are fundamental—the ones that we as a country really need to deliver and about which there is no ambiguity. Once the Government decides which are those policies—I have used the example of addressing climate change—that is where we do not want ambiguity; those are “required” or “must” be delivered. Where there is a “should”, there will be debate.

Planning is subjective by its nature. For each development that comes forward and for each local plan, the essence of planning is in weighing up different factors. Heads of Planning expect some policies to involve language such as “require” or “must”. It is difficult; it is not easy. We are asking for that balance of clarity and certainty,

not just for planning authorities or for the planner who has the planning application in front of them and wants clear and concise national policy on how to interpret it, but for our communities, for the growth of further confidence in the planning system, and for our investors across Scotland.

Councillor Steven Heddle (Convention of Scottish Local Authorities): To respond directly to Mr Dey's question, the answer is no; we do not believe that there should be a blanket strengthening of every "should" to "must". The approach needs to be more nuanced.

For example, I refer to Pam Ewen's initial comments about addressing the climate emergency. That is in policy 2:

"All development should be designed to minimise emissions over its lifecycle in line with the decarbonisation pathways set out nationally."

That is one in which "should" should be strengthened to "must", in order to give local authorities a firmer position to tackle the global climate emergency.

A counter example might involve policy 5, on community wealth building. The word "should" should remain, because, although we are massive supporters of community wealth building, not all areas are covered by that or have the ability to access it; "must" would be a blunt instrument in that case. The upcoming community wealth building bill means that the relationships between planning and community wealth building will need to be carefully considered and explored.

Our position is to support the Scottish Government in its review of the wording of the Scottish planning policy to identify cases in which it needs strengthening. That is consistent with the position that has been advanced by HOPS.

The Convener: Thank you for that specific reply; it is good to have those examples.

I will direct the next question initially to Steven Heddle. It is about the consultation timescale. There has been quite a bit of concern about the fact that the committee is consulting at the same time as the Government and gathering feedback from stakeholders. Will you expand on those concerns and feed back on how you would like consultation to take place as a final plan is developed?

Councillor Heddle: To be honest, I do not have a clear answer to that. In our own sphere, there is pressure in responding to the consultation on the framework. So far, we have provided only a holding response and we are developing a more nuanced response through our committee structures. We will be addressing that on Friday at COSLA's environment and economy board, and subsequently at our meeting of council leaders,

before the end of March, when we need to respond. The inherent question is around NPF4 as it develops and whether there is a need to further consult on that. My colleagues in HOPS and RTPI would probably have a more nuanced response to that.

09:45

The Convener: Pam Ewen, you mentioned that the document is in draft and being consulted on, and that that is a process. Do you have any further thoughts on the dual consultation?

Pam Ewen: The consultation process to date has been very collaborative and I think that it has been appropriate and proportionate. There have been lots of opportunities throughout to participate. Even before the draft came out, a lot of work was done and there was widespread engagement.

Your pertinent question is whether there should be further consultation. That hinges on whether the Parliament considers that there should be a significant shift in any of the draft policy that is before us. If so, Heads of Planning would consider further consultation to be reasonable.

It is important to get the wording right. Heads of Planning would rather an additional few months were added to the process in order to get it right now, than move forward with policies that may be ambiguous, as we said earlier. At the end of the day, that will save time and prevent appeals and court cases, which only go to slow investment and absorb resources, often unnecessarily. It is important to get NPF4 right and we have the opportunity to do that. As I have expressed, Heads of Planning will be happy to continue to work collaboratively with Government on that.

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

I will expand on the convener's points in the first couple of questions. My question is about the different sections of the national spatial strategy in the draft NPF4. In comments that we have had so far, there has been concern that those do not carry through to national planning policies and that there seems to be a disconnect. Do you share that concern? If so, do you have any examples? What would be the best way to try to make sure that there is connectivity? I will go to Pam Ewen first on that and then to Sarah Shaw.

Pam Ewen: It is a lengthy document, it is pretty complex when you start to read it, and it is important to get the up-front part. There is an opportunity to make the up-front part of it a bit more concise and shorter, because the policies

are the fundamental aspects, and they will help to determine planning applications across the country. There are areas in which that needs to be pulled through in a bit more detail.

Some of the read-across of the documents is not clear, and specific priorities do not flow through. An example that comes to mind is heat and energy. The early intentions and ambitions come out pretty strongly, but how does that flow through to the policy? A colleague talked about the nature crisis and how the document can refer to NatureScot's documentation. There are many cross-references to documents.

At the end of the day, from the Heads of Planning Scotland perspective, if a case officer is sitting with a planning application in front of them, they need clarity and precision, and that is down to the wording of the document.

Some of the cartology needs to be improved—that is, some of the schematic maps. We need to look at how those details will be taken through into local development plans and, where appropriate, regional spatial strategies. Some of the overlapping areas are quite confusing. For instance, some council areas, such as the South Ayrshire Council area, are not covered as one council area. We need to consider how we can get clarity in moving the document forward.

In Heads of Planning Scotland, we have discussed how it is important to remember that, although such styles were appropriate for national planning frameworks until now, the fundamental change is that NPF4 will be part of the development plan and will carry much more status, so clarity and definition must be built into it.

Paul McLennan: Do the national planning policies need to be reviewed more broadly? Are they reviewed piece by piece—policy by policy? I know that we had the planning review just a couple of years ago but, as you said, connectivity is important because of what we are moving forward to. I ask Pam Ewen and the rest of the panel whether we need a much broader review or whether connectivity across the policy sphere can be ensured through policy-by-policy review.

Pam Ewen: The approach is policy by policy. Heads of Planning Scotland considers that the scope of NPF4 is about right overall. We support the direction of travel and the ambitions—particularly on the climate emergency, the nature crisis and reaching net zero. The key point that we make is that, to achieve the ambitions, NPF4 must be clear, concise and deliverable.

The one aspect that we are disappointed in is that the draft delivery plan was not published alongside the draft NPF. We are debating a new part of the development plan in Scotland without

clarity about how it will be delivered. A capital programme is fundamental, as is revenue.

I certainly do not want to give the impression that a lot of the policies are wrong; they are heading in the right direction, and we are talking about tweaking them and about the nuances. We are happy to sit down and give support and resource to help to shape the policies into their final form.

Paul McLennan: I will bring in Sarah Shaw and then open the discussion to the floor.

Sarah Shaw: As Pam Ewen said, the front end of NPF4 is wordy and has many layers—the spatial strategy elements are divided into principles and action areas. As Pam Ewen also said, the definitions of some action areas are loose—for example, the central urban transformation area covers a wide range of communities, from cities to smaller communities. How the vision for those areas will be taken forward into policies is not entirely clear—for example, the ambition is to reduce vacant and derelict land across Scotland, so that could have been recognised more overtly as a national development. Addressing such land is recognised as one element of the Clyde mission, but delivery of the ambition does not necessarily come through in the rest of the strategy and could be more overt.

The front end of the document is wordy, and it is difficult to follow the logical flow through some of the ambitions, which none of us disagrees with. However, there could be more clarity about how the ambitions will be achieved through the policies.

The parameters of some of the mapping have been drawn narrowly. The Clyde mission involves a narrow corridor along the river. If the aim is to tackle vacant and derelict land in the west of Scotland, maybe the scope needs to be widened to be a national development. There are other such examples.

In general, the front end is more confusing in how it reads. Maybe the thrust of that needs to be clarified.

Craig Iles (South Ayrshire Council): I have two points. I reinforce that NPF4 will be a working document and not a strategy document—it will be used to assess every planning application that is determined in Scotland. That is why the precision of the policies is really important. The document will apply to everything from a household to a wind farm, so it needs to be absolutely correct. That is why policies probably require to be split down more, to reflect such situations more. A broad-brush approach is taken, which is a concern.

On spatial matters, I will make a selfish point from the west of Scotland and Ayrshire point of

view. The central urban transformation area covers the central belt and lips down the coast to put some of our settlements at Girvan and such like into the same category as Glasgow and Edinburgh. The map also includes the Isle of Arran, which, although it is in North Ayrshire, does not have the same issues that Glasgow, Edinburgh and other places in the central belt have. Things such as that need clarity.

Again, NPF4 will be a working document. If we have applications in those areas, the boundary lines of the zone are unclear, particularly as they run through the middle of our district. It is impossible to tell where our settlements sit in relation to the boundary line on the map on page 31. It lips down the coast, and it is unclear whether some of our settlements that sit slightly inland are or are not in that zone. That will be vital when it comes to assessing an application, which is what the document is for.

David Dunne (Aberdeen City Council): I echo the points that have been made. The action zones and the spatial strategy are the parts of the document that we would struggle with most. For example, in relation to the north-east, the action zone identifies energy transition as the key aspect moving forward, but that seems at odds with—this goes back to the point that Pam Ewen made about the read-across across all Scottish Government documents—the city region deal, our regional spatial strategy and our current strategic development plan in understanding the importance of diversification and moving away from, and not being solely focused on, energy.

The previous national planning framework was very clear that food and drink, particularly in the north-east, given the fishing and agriculture industries, are particularly important. I struggle to understand the role of the action zones. The actions that come out of them, such as

“Reinvent and future proof city centres”,

appear to be focused very much on the central belt, as Sarah Shaw pointed out. Obviously, Aberdeen has a substantial city centre and it is a regional city centre, so we would have thought that that policy would apply to it. That feeds back into Craig Iles’s point about the importance of the document for determining applications and what policies apply and do not apply. We need to get that right.

In that context, as Sarah Shaw mentioned, the front section of the plan could be streamlined and focused on a little more to ensure that it covers the right areas and, as Craig Iles mentioned, excludes the ones that are not appropriate.

The Convener: It is very good to hear about the more specific issues around the action zones, which feel like just swathes of colours on a map of

Scotland. If we were not going to have action zones, what would be a good way to map out different areas of Scotland? Does Iain McDiarmid want to pick up on Paul McLennan’s question?

Iain McDiarmid (Shetland Islands Council): That is certainly an area that has concerned us in Shetland, and I have spoken to people in Orkney and the Western Isles about it. The action areas cause a bit of concern. The north and west coastal innovation area is geographically widespread. Although we have some things in common, there is quite a degree of difference. Things such as extended transport links are important. There is a huge cost in getting off the islands. There is even the problem of getting from our outer islands to our local services on the mainland part of Shetland.

We have a lot of differences in things such as settlement patterns. Obviously, that impacts on land use planning policies and how we implement the national planning framework. In some areas, there is population decline, but Orkney’s population is increasing. Some of us have difficulties in recruiting to vacant posts, and there are skills shortages across all sectors but, in Shetland, we have nearly 100 per cent employment. One thing that we all have in common is the difficulty in recruiting to planning service jobs.

10:00

I think that we are all struggling to see the benefit of the proposed action areas and how they tie in with the regional spatial strategies and local development plans. I will give an example. Orkney and the Western Isles could possibly fit more comfortably into the north-east transition area. We are looking at actively planning a just transition from oil and gas to a net zero future, so we are thinking about the future of Sullom Voe in Shetland and Scapa Flow in Orkney. That might tie more into what the national planning framework is trying to achieve in the north-east and the Aberdeen area.

Although the action areas sound and look very good, I worry that they could create a lack of certainty when we get down to the local development plan and local authority levels. As has been highlighted before, that could make development management decisions particularly difficult.

Paul McLennan: That leads nicely on to my next two questions, the first of which was just touched on. Do local authority planning departments have sufficient suitably qualified staff and funding to deliver the desired NPF4 outcomes? I think that I know what the answer will be, and I can see the wry smiles from witnesses already, so there will probably be a few who want

to respond. Also, how can we best attract people into the profession in the coming years?

I will go to Jane Tennant first, then to Steven Heddle, and then open it up to the others. Jane will be first, as she has been in the industry only in recent times.

Jane Tennant: I echo many of the points that Robbie Calvert of the RTPI made in the committee's session on NPF4 on 25 January. The RTPI has estimated that, to undertake the core statutory functions of the planning system, about £68 million will be required over the next parliamentary session. Although that essential resource level can be met with an increase in fees, £24 million still needs to be funded from the Scottish budget over the parliamentary session. That equates to an approximately 40 per cent net revenue increase for the planning system over the next five years. However, in terms of budgetary ask, the annual increase in local government block grants would equate to just 0.01 per cent of the total Scottish budget.

We also have additional duties. We have the regional spatial strategies and local place plans, and the RTPI estimates the cost for such things to be about £3.7 million for the current parliamentary session.

The RTPI does a lot of work to get people into the industry. The Scottish young planners network goes out to universities, planning schools and so forth, although we need to do a wee bit more. There is also the chartered town planner apprenticeship scheme, which the RTPI estimates would cost about £10.4 million over the next parliamentary session. I would like that to be developed a bit more.

Recent studies have shown that only around 9 per cent of local authority staff are under 30 years old, which means that we are top-heavy as a profession. The replacement demand for planners is particularly high. We have 2,100 members in Scotland, so we will need to replace 500 or 600 planners over the next 15 years, which is ultimately a quarter of what we have.

Young planners want to deliver on the ambitions in NPF4. We think that, largely, it is work that needs to be done because of the climate emergency and so forth. However, we need a well-resourced system and we need clarity in the NPF. They are our tools to deliver.

The Convener: It is great to get it down to numbers—that is very helpful.

Councillor Heddle: Mr McLennan asks a pertinent question. I am pleased that the RTPI has led on this area and provided research on the state of the planning system workforce.

From the local government point of view, resourcing is practically an existential question. In the previous settlement, we were delivered a £317 million real-terms cut. That has recently been ameliorated by a £120 million adjustment, which means that we are just £250 million down, or £50 per person in Scotland. Local government in general is suffering a resourcing crisis and the planning system in particular is suffering a resourcing crisis in its ability to deliver the service.

We advocate moving quickly to full cost recovery in order to not only deliver but develop the service. We have a recruitment problem. Over the next 10 to 15 years, we need to recruit in the order of 700 new entrants into the sector, and they are not trained overnight—it takes a number of years to become a skilled planner. Due to the impact of NPF4 in refocusing priorities towards a just transition to net zero, we will be required to reskill the workforce in general. The resource implications of the process must be considered as part of the impact of the framework.

Full cost recovery is part of the solution, but it is not necessarily the whole solution. We need to understand in a more holistic form how the planning service should be resourced. That is regularly a major topic at the high-level planning performance group, which I co-chair with the Minister for Public Finance, Planning and Community Wealth. Our colleagues in HOPS and RTPI are represented on the group.

Pam Ewen: It is pertinent to ask whether we are resourced to deliver the intentions and aspirations of the NPF. As we understand it, a proposed application fee—a statutory fee—is coming, which we will welcome. However, it is likely to fall very far short of full cost recovery, which HOPS has sought for more than a decade. The issue is compounded by the reduction by a third of planning staff since 2019 and, over the same period, a real-terms budget reduction of 43 per cent.

Jane Tennant and Councillor Heddle have talked about a forecasted demand for 700 planners in the sector in the medium term. Given that, it is difficult to imagine how the planning system and planning authorities can deliver the Government's NPF4 aspirations without full cost recovery and proper resourcing. There has perhaps never been a more exciting time to be a planner and to work in the planning system, but the flipside of that is that there has never been a more important time to get the proper resourcing in place.

This morning, we have talked about some of the complexities of the draft NPF, which will require additional work by planning authorities and planners working in local government, and it will also require additional work by promoters of sites.

That work is on top of the 49 new and unfunded duties that came to planning authorities through the Planning (Scotland) Act 2019. On the ground, in the front seat of planning authorities, local authorities and others working across the system, we must be able to resource that work and to upskill our talent and skill set.

It is a fundamental issue for HOPS, and it has two aspects. There is the money side, on which we have been having discussions with the minister, and there is the people side—the gap in the profession. Paul McLennan’s question related to both aspects. I am pleased to say that, with the RTPi and supported by the Scottish Government, HOPS has recently commenced a study on future planners. The study is looking at recruitment, retention and the promotion of planning as a career in planning authorities. Those are the challenges that need to be addressed. Opportunities need to be created, too.

As chair of HOPS, I cannot stress enough the critical need to properly resource planning authorities. That need is for now; it is not for three or seven years’ time and it cannot wait another decade. The proposed planning fees address a backlog of resourcing issues. We want to look ahead to how we can implement NPF4 as the Government intends.

The Convener: It is good to hear you say that it is an exciting time to come into planning. That is absolutely true. It is a critical role and I would encourage many young people to become planners.

Craig Iles: I want to drill down to the more practical level of what we are required to do. One driving force behind the changes to the planning system is community involvement. Local place plans, which have been mentioned, are to be made by local communities, with the assistance of the planning authority. That is how that has been shaped.

We have 29 community councils in South Ayrshire. Each one could put forward a local place plan with the expectation that the planning authority would be able to help them with that. We would have to incorporate the plan into the ongoing workload for our local development plan, which we would be preparing at the same time and in line with NPF4.

At the moment, our policy sections are set up to prepare a local development plan. They might not all do it, but we could have 29 communities, with varying degrees of ability, expertise and resource, preparing their own plans. That would create an additional task. Communities are hugely important to the process, and we would want to involve them as much as possible, but that needs to be resourced. We need bodies on the ground to

provide support. That is the sharp end of the big statements about resources and bodies. They are required for tasks such as that, which are completely new to the system.

The Convener: That was great, because you have answered some questions that I had been wondering about. That level of detail is helpful. I know how much effort is needed, because I have been involved in a local planning initiative in my community, although not a local place plan.

Graeme Dey: My question is for Pam Ewen. The written evidence from HOPS suggested that delivering on the ambitions of NPF4 would require a significant culture change. Can you expand on that? Might that culture change extend to councils’ attitude towards planning? There was a reference a few moments ago to budgets having been cut by 43 per cent. Such a budget cut would be well in excess of any change in the budget settlement that the Scottish Government gives to councils. Should there be an attitudinal change in councils about the significance of the planning service?

Pam Ewen: We have been talking about cultural change across the planning system for many years. A lot of change has happened. The planning service has an important role in place leadership and in involving and collaborating closely with communities to help them to have a bigger say than they have ever had in how their places should change. Craig Iles mentioned local place plans.

There is culture change towards doing that, but we need another culture change. How does any player involved in delivering the ambitions and intentions of the national planning framework raise their game and change how they design a place, engage with a community and bring that forward to the local authority? This is not only about planning authorities or councils; it is about all the players involved in delivering great places across Scotland.

We should not forget that we already deliver good quality places across Scotland. Lots of development comes forward all the time to create good quality places. For HOPS, the NPF is telling us to make a step change in some areas and to go up a few gears. Earlier, I touched on addressing climate change, which is an absolute must. There are a lot of things relating to the culture change.

I have touched on the need for the upskilling of many people who work in the planning system and not just planners. In a council, lots of people are involved in the planning system. Council colleagues in areas such as education, transportation, waste and health, including environmental health, work towards those aims.

10:15

Councillor Heddle: Thank you for the question, Mr Dey—it is good to see you again.

You are suggesting that planning services received a disproportionate cut that does not match with any cut that might have been directed at local government. I note that the 43 per cent figure is since 2009, so that cut has been over more than a decade. It reflects the amplifying effect that the Scottish Government's direction of spend has on services in which local government still has a degree of discretion.

Local government cuts any service with a heavy heart. We would like to fully fund every service and to develop every service so that we provide better services for our populations. However, the reality is that between 60 and 70 per cent of all local government spend is directed by the Scottish Government. That leaves very little discretion regarding the remaining 30 or 40 per cent, and it is regrettable that those services will experience the brunt of the cuts.

I always say that, if anyone wants to know the effect of cutting local government funding, they should look at the state of their roads. That is a discretionary service, and it is one area in which we have, regrettably, had to cut spend, even though we do not want to cut it.

It is not a matter of culture change. There needs to be a change in attitude to local government, so that local government gets the funding to allow us to adequately fund our services. That is especially important when we are trying to deliver a complete transformation of the world in which we live, as we move towards net zero. The idea that we can achieve that transformation while local government receives a quarter of a billion pounds cut is optimistic to say the least. We need to get real as far as local government funding is concerned if we want to deliver the step changes that we all want and have to achieve.

The Convener: I will bring in Mark Griffin, who joins us on BlueJeans.

Mark Griffin (Central Scotland) (Lab): Good morning. Quite a few witnesses have touched on the ambitious nature of the draft NPF4. Does it need to be accompanied by a capital investment plan for those ambitions to be realised? I ask Pam Ewen to answer first.

Pam Ewen: Absolutely. As I have touched on, HOPS was disappointed that a draft delivery plan was not published alongside the draft NPF4, which would have allowed us to have a thorough debate. We understand that the Scottish Futures Trust has taken forward that work, and we have reached out and said that we will work collaboratively with it to

look in detail at the plan, which has to be delivered.

The infrastructure-first approach is one thing that comes out of the draft document. Timeous delivery of infrastructure is fundamental if we are to deliver the strategy. We need a funding mechanism that provides up-front infrastructure, whether that is new school capacity, local energy systems, green networks or infrastructure relating to walking, cycling or waste. That is needed particularly in areas where land values are lower. The NPF has much more of a focus and direction on the redevelopment of our town centres and brownfield sites. However, if it is not commercially viable to bring forward sites, where is the capital programme that allows the public sector to intervene so that they are delivered for the benefit of communities?

It is important that a capital programme looks across other plans and strategies. In effect, NPF4 should be the spatial expression of Scottish Government policy and direction, and it should be clearly linked to other plans and strategies, some of which will need to be updated, as they do not quite align with it.

The capital programme is absolutely essential, but it is not just about capital; it is also about understanding the revenue consequences—I use the word “consequences” lightly—of new development and growth and the pressure that that puts on local councils. It is about understanding the capital and revenue implications of NPF4 and setting out clearly how that will be driven forward.

There are good examples in England. There is a lot of debate there that is paralleling this debate. Beside that, a capital programme is being driven forward. I understand that similar work has been done in Ireland.

We must understand how the plan can be delivered. I always say that writing a policy document is the easy bit—although it probably does not feel like that to the chief planner—and delivering the policy is the hard bit. The capital is essential to that.

The Convener: Craig Iles and David Dunne also want to come in on capital investment plans.

Craig Iles: To answer the question, a capital investment plan is really important. In Ayrshire—not just South Ayrshire—we have road infrastructure problems in the transport network, and investment is needed to be able to take forward that work. However, that is not mentioned in NPF4 or in the strategic transport projects review 2 consultation, which is another on-going consultation document. As the committee will be aware, for funding to be brought through for those matters, there needs to be a policy basis to justify

that at the stage when they come through. There is not a connection between the real issues on the ground in the wider areas outside the central belt and the document, and they need to be reflected in it.

The capital investment plan is an absolute must to help to drive forward the projects and the plan. The infrastructure-first approach is an appropriate way to proceed, but the developers and house builders do not have the finance behind them to be able to fund those things up front. They require investment from central and local government to be able to do those works.

David Dunne: I want to pick up on two points. I echo Craig Iles's point about STPR2 and the importance of weaving that, as with other strategies that we mentioned earlier, through the document to give it policy support as applications come forward for developments.

I go back to the point about infrastructure in relation to brownfield development. Historically, Aberdeen has had a very limited supply of brownfield land compared with other areas of Scotland, and our land values have been much higher, although that has probably changed in recent years. We have had to put in place a number of initiatives to encourage the development of brownfield sites.

Our other challenge is in some of our historic buildings that are difficult to get back into use, particularly in the city centre. We have tried to encourage their reuse for residential purposes. Again, that reflects the direction of the new NPF.

I will give examples. We have a 25 per cent affordable housing requirement throughout our administrative area, but we have waived that requirement for development within the city centre to try to encourage and support developers who want to use those buildings or sites.

On top of that, we have looked at development viability case by case, and have waived other developer obligations where required. The important point, to go back to infrastructure delivery, is that, fundamentally, the costs for those schools and that other infrastructure do not disappear; they just fall on the public purse, and on local government in the first instance.

Pam Ewen mentioned a delivery plan. I echo the point that a delivery plan is vital in order to look at the proposals and the policies in NPF4 and to allow the Parliament to make a considered decision on those, when it comes to the likely funding implications at local and national level. However, we also need to look at some of the policies in the round.

Meghan Gallacher (Central Scotland) (Con): Good morning. I refer members to my entry in the

register of members' interests: I am still a serving councillor on North Lanarkshire Council.

I want to ask about 20-minute neighbourhoods, as they are a significant feature that runs through all sections of NPF4. How can they be delivered in practice, particularly in rural areas? A couple of you have indicated that that might be problematic.

Craig Iles: Basically, 20-minute neighbourhoods are good planning. They are about bringing forward appropriate development in the right location. It is vital that brownfield developments are brought forward. By their very nature, they are probably located within a settlement and within a reasonable distance from other facilities, because, for example, they were factories in the past. It is about bringing back such elements.

Essentially, it is a question of good planning. Transport linkages are vital. We have not touched on that. Sustainable transport is a huge factor in being able to make good neighbourhoods work. It is probably the case that all planners who have read the 20-minute neighbourhood idea will have thought, "That's just good planning."

I will stop there, rather than ramble on to other things.

The Convener: We will hear from Pam Ewen next, and it would be great to hear from Iain McDiarmid as well, to get a Shetland perspective.

Pam Ewen: To build on what Craig Iles talked about, the concept of 20-minute neighbourhoods is not new; planners have been working on it for many years, and it is good planning. The challenge, which is what the essence of your question is about, is that it cannot just be applied across Scotland. I think that what is sought in the draft NPF is for it to be written in such a way that it is flexible enough to apply at the local level, because all our places are different.

The concept and the theory of 20-minute neighbourhoods is laudable and has been in planning practice for a long time. The challenge comes with the difficulty of delivery. For example, the reality of delivering a shop in a community that does not have one gets to the heart of behavioural change in society and in the way that we lead our lives.

It is a chicken-and-egg situation. If we do not create places that encourage people to walk more, to shop more locally and to live locally—which is a theme that comes through in the NPF—how do we start to fundamentally address those changes? In some areas, that might come back to a requirement for public investment—public incentives—to make deliverable some of the components of a 20-minute neighbourhood.

Heads of Planning whole-heartedly supports the concept and the theory, but we need to work through how that can be delivered in rural areas—and how it can be retrofitted. Often, such discussions are about how we will apply NPF4 when new development proposals come to us, but that is only a small minor part of Scotland's land use change. We need to consider how we will retrofit and what role the public sector has in creating and bolstering 20-minute neighbourhoods.

10:30

The Convener: Thank you, Pam. It is great that you have brought up retrofitting, which seems to get missed in the conversation but is critical to the way forward.

Iain, would you like to comment from a Shetland perspective?

Iain McDiarmid: Yes—thank you. It is the bane of our lives that the phrase “20-minute neighbourhoods” has come in. I wish that I had a pound for every time someone has said that it takes them 23 minutes to get somewhere. It is not really about the number of minutes; it is about the concept. However, the phrase catches people's attention, and I suppose that that is important, too.

I know from discussing 20-minute neighbourhoods with my colleagues in the Western Isles and Orkney that they have a concern about the relevance to rural and island communities. I look back to what we talked about earlier—the action areas in the spatial strategy. NPF4 says:

“Island and coastal communities will need a bespoke and flexible approach to the concept of 20 minute neighbourhoods, for example by identifying service hubs in key locations with good public transport links.”

Craig Iles made that point earlier. I think that we have been taking a flexible approach, but we need to adapt 20-minute neighbourhoods for our particular circumstances.

I echo the point, which Pam Ewen and Craig Iles made, that planners have been doing this kind of thing for a long time. In Shetland, we have been working to these principles in our local development plan, although they have other names. We have zones of preferred development, which aim to be much of what is in the 20-minute neighbourhood concept. The Knab redevelopment site, which is mentioned in NPF4, is an on-the-ground example of how we are trying to implement such policies about living locally. Developing for communities and not for commuters is applicable to every part of Scotland, and not just in an urban context.

The Convener: Thank you for that. It is good to hear that perspective.

We will move on to discuss the minimum all-tenure housing land requirement, on which I will bring in Pam Ewen and then Sarah Shaw, initially. How do you think that the minimum all-tenure housing land requirement will work in practice? Is it clear enough? Will it direct new developments to where they are needed? A supplementary question that has come up in evidence sessions is whether we need to rethink how we do housing in Scotland in general.

Pam Ewen: Heads of Planning Scotland welcomes the concept of quality homes and supports the move to a more flexible and locally based approach to the minimum all-tenure housing land requirement. Housing land requirement is always a key debate, be it through the national planning framework structure, the strategic plans of the past or local development plans.

However, councils and local elected members know their areas best, and the approach allows local consideration of whether and where the minimum targets should be increased. Through the local development plan process and working corporately across the council, councils will give detailed consideration to whether the minimum targets should be increased to meet the needs in their areas. They might look at the issue from the perspective of, for instance, a policy approach to a particular town centre, or they might look to provide more flexibility in relation to particular elements of brownfield land.

Heads of Planning Scotland is comfortable with the approach that the Scottish Government has taken. It has involved planning authorities, which have worked closely with their housing colleagues in councils on the approach that they have taken. We support in principle the approach that has been taken in the national planning framework.

On the question about whether the minimum all-tenure approach directs housing to certain areas, I think that that will have to be looked at in the round along with all the other policies in the national planning framework. I have mentioned brownfield sites and town centres, but appropriate greenfield sites will need to come forward, where those are sustainable. We need to ensure that there is a depth of choice, and a quantity, of sites that are deliverable and which have either the necessary infrastructure already or—this brings us back to the infrastructure-first approach that we have talked about—a programme in place for that infrastructure.

As heads of planning, we are comfortable with the approach that is set out in NPF4, and we think that we can take that forward in all our local

development plans. We also feel that it gives local flexibility to the elected members who are making the decisions on those plans and who know their local areas best.

The Convener: Sarah, did you want to come in?

Sarah Shaw: From a Glasgow perspective, we felt that there was an opportunity to be more overt about whether we wanted existing trends in housing investment to continue in Scotland or whether we should try to rebalance the situation. There is a prediction that the housing requirement in the east of Scotland will be much stronger, and that is reflected in the housing land figures in NPF4, but we felt that there was an opportunity to determine that sort of thing more locally at the city region level and, potentially, to rebalance and push further housing investment towards the west of Scotland, which brings us back to the issue of vacant and derelict land and the capital investment that is needed in that respect. That could be an ambition in NPF4.

With regard to policy 9, which relates to the all-tenure housing land requirement, it is a very complex and dynamic area, and we feel that that particular policy does not really convey that complexity. Other elements could be defined more precisely. For example, does the land requirement in NPF4 mean land for a certain number of houses or for a certain number of houses to be delivered? There will be a bit of debate about that, because it is the sort of issue that ends up in appeals and court cases. Moreover, some definitions in the policy refer to short, medium and long-term deliverable housing land pipelines, but there is no definition of that. Further clarification will be needed to ensure that things do not end up being scrutinised in courts and appeals, and that we all know what we are talking about.

The Convener: Thank you very much for that—it is good to get the Glasgow and west coast perspective.

I call Willie Coffey, who joins us virtually.

Willie Coffey (Kilmarnock and Irvine Valley) (SNP): Good morning. I want to develop a discussion about how and whether NPF4 deals with not just the vacant and derelict land that Sarah Shaw mentioned a moment ago, but the derelict and abandoned dirty, filthy shops that blight our high streets. A lot of good work is being done in a lot of town centres across Scotland, with communities and councils doing a lot to improve areas and towns, where they can. However, many of my constituents often ask me, “What can we possibly do about the 18 abandoned shops that are blighting our high street?” The properties in question are mainly privately owned.

My question, therefore, for Sarah Shaw and perhaps my Ayrshire colleague Craig Iles is: what can we do about this? Should NPF4 strengthen powers in that respect, or do we already have sufficient powers under planning legislation to deal with the issue through, say, amenity notices?

Sarah Shaw: There are a couple of aspects to that. First, there is an aspiration in NPF4 and across Scottish planning authorities to have more residential use of town centres. There is a possibility of repurposing some vacant sites, but that depends on the market; I think that you are asking whether the council can influence the situation more directly.

When it comes to enforcement, councils have powers to take direct action and serve amenity notices in various situations. The problem is that, often, they do not have a budget to take direct action; the costs of the action have to be clawed back from the owner of the property, which is not always practical. There are practical issues with councils taking direct action. It is not so much a question of giving councils legislative powers; it is partly about giving them the resources to act.

The whole concept of repurposing town centres to make them much more multifunctional and less focused on retail should help, but there are practical issues. It will not always be possible to convert shops into housing, but the aim is helpful. NPF4 mentions having more of a focus on town and city centre living. There is a policy that shops that are used for residential purposes should still have active frontages. That is important in a town centre. Similarly, it is important for retail and other town centre uses to have active frontages. We should make that clear.

Craig Iles: Mr Coffey made a pertinent point about the challenges that we face. We know that our high streets are changing because of the increase in online shopping during the Covid pandemic. Retailers are reducing their footprint in the high street. That leaves us with the problem of how we tackle that.

On the enforcement side, amenity notices are of limited use. A shop front might be dirty or vandalised, or people might be able to see that it is messy inside but, from an amenity point of view, there is little that the planning process can do to deal with that.

We face a more extreme situation with vacant and derelict buildings. A prominent example in South Ayrshire is the Station hotel in Ayr, of which, I am sure, Mr Coffey is aware. It has an absent landlord, who is not a British national. It is very difficult to engage with that individual. He does not want to engage with the council to resolve the issue. In addition, the building is dangerous and it

is costing the council money to make it safe for the public.

We need to look at the process that exists for the council to act on such matters. There is a notion that we could use our compulsory purchase powers, but we would have to have a master plan to take that forward. We would need time and resources to take that on. The legislation also requires us to have the funding available to carry out any master plan. As has been discussed this morning, councils have limited resources to take forward such matters. That is where the real challenge comes in. Perhaps central Government could look at providing funding to deal with vacant and derelict land. There might be a need to look at the legislation on compulsory purchase powers.

Stepping away from larger-scale projects, shop units will be owned by investment companies that will have no interest at all in those high streets. The shops are just a line on their balance sheets. It is very difficult to get the companies to do anything with those buildings. The fact that they have been built to be shops makes it very difficult to convert them to other uses.

If we are to reinvent the whole process, the compulsory purchase process should be looked at, and investment needs to be put into dealing with vacant buildings and vacant and derelict land. The issue relates back to the question about 20-minute neighbourhoods. Our town centres and local communities already have all the things that go into 20-minute neighbourhoods. In doing up our brownfield sites and vacant and derelict buildings, we are already retrofitting those areas. That should be explored further.

10:45

The Convener: Thank you—that was helpful. I will bring in Calum Lindsay.

Calum Lindsay (Convention of Scottish Local Authorities): Thank you, convener—I put an R in the chat box to respond to the question about minimum all-tenure housing land requirements. I know that we are pressed for time, so I will quickly flag up a point.

The timing has been quite tricky for COSLA to form a position on the issue. Our members have flagged concerns, which are mainly about the principle of target setting for local government. However, as we have heard today, HOPS is quite supportive of what has been proposed. Unfortunately, we have been unable to put HOPS's position to our members and offer them that reassurance. Different timing might have allowed us to present a firmer position.

On Willie Coffey's question about vacant and derelict land, I support everything that HOPS

said—the issue is usually as much about resources as it is about legislative powers. The regeneration capital grant fund has given us good examples of what can be done when the capital is there to address vacant and derelict land.

Stronger policies and strengthening the wording of some policies could be beneficial. To go back to a point that was made at the beginning, stronger wording of policy 30, which addresses vacant and derelict land, could give local authorities better tools to deliver the framework's ambition.

The Convener: It is good to hear from you; I am sorry that we did not get you into the conversation sooner.

Miles Briggs (Lothian) (Con): We have already touched on infrastructure. The draft NPF4 says:

“We want an infrastructure-first approach to be embedded in Scotland's planning system.”

What should that look like? Will NPF4 as drafted help to achieve that?

Pam Ewen: As I said, the view of Heads of Planning is that the infrastructure-first approach is essential. We have talked about that for a long time, and we often look to really good examples in mainland Europe—of course, there are examples across our country, too.

As has come out of this morning's discussions, the approach is fundamental because the issue is not necessarily having in place the legislation or the statute; what is missing in a lot of this is the funding—the capital resource and often the revenue resource to support the people who are behind projects. Where is the upping of such resources to deliver in our town centres and bring forward brownfield sites?

I know from my role as head of planning at Fife Council that, in large growth areas, the issue can be funding streams, and sometimes there is a timing gap. We must ensure that proposed developments are viable. Sometimes, a new school needs to be delivered early because of capacity issues or a piece of transport infrastructure is needed. We need to think through at an early stage what the NPF says and directs, and where the capital programme is behind that to deliver the infrastructure-first approach.

We have touched on the fact that the NPF does not sit in isolation. We must consider the strategic transport projects review, the economic strategy and local heat and energy strategies—I often think of them as all the bits of the jigsaw. We must ask how they all fit together to deliver timeously and to give the best opportunity to create a quality place for our communities.

Councillor Heddle: Pam Ewen has essentially made the points that I was about to make. To understand what forms an infrastructure-first approach, we need to know the infrastructure requirements and investments that are associated with the other plans and strategies with which we wish NPF4 to align.

We have good alignment with some strategies. The drive towards net zero has been mentioned. However, on the heat in buildings strategy, which Pam Ewen mentioned, we believe that it will cost us approximately £4 billion to achieve the decarbonisation of heat in buildings. That is clearly a fundamental part of our move towards net zero. Understanding the infrastructure investment that will be associated with that and dialling it into NPF4 is just one example of the cut-across with other strategies that needs to be strengthened.

STPR2 is mentioned 10 times in NPF4 and eight times in the national transport strategy. It is great that there is recognition of such strategies, but there is no mention of the heat in buildings strategy. The national strategy for economic transformation—which we are eagerly awaiting and that is due to be published at the end of February—and the programme for government will be fundamental in directing policy.

My answer is really a question. How do we ensure that there is adequate mapping of the strategies that will drive investment and public policy, and that that is coherent with NPF4?

The Convener: Craig Iles wants to come in, but I wonder whether Miles Briggs wants to develop his line of questioning a bit more.

Miles Briggs: Yes, please, convener. I want to drill down into the competing pressures and strategic outcomes. For example, we know the targets that the country has set itself for the production of renewable energy. Do the witnesses think that NPF4, as it is currently drafted, will help to deliver renewable energy in their council areas, given the competing demands that exist, such as those relating to the restoration of peatlands? How will that be taken into consideration? That is quite a wide question, but I want to look at how NPF4 will meet the targets in the world of renewables.

The Convener: Does Craig Iles want to pick up on that question? I think that renewables is relevant to your part of the world in South Ayrshire, and peatland restoration probably is, too.

Craig Iles: I will make one point in relation to the previous discussion about the delivery of infrastructure. House developers do not have the finance behind them to pay for such infrastructure up front. They require to pay for it on a cash-flow basis, as houses are sold. That is why we need more central funding for the delivery of such infrastructure.

On the question of how NPF4 fits in with renewables, South Ayrshire Council, East Ayrshire Council and Dumfries and Galloway Council all have significant land resource for renewable energy. We are under significant pressure from communities in those areas, who are tolerating a great deal, with wind farms getting larger and taller by the week, given the number of applications that are coming in. As far as I understand, infrastructure has been put in place for the delivery of such things. There is certainly enough area for wind farms to be developed. I know that a huge amount of Scotland's renewable energy comes from southern Scotland, which covers those three local authorities.

Through wind farm applications, there are opportunities for peatland restoration projects. They tend to be in localities where peatland has been degraded over the years by farming techniques and suchlike. Such restoration should be a benefit of those schemes, and there should be an element of cross-funding for those wider areas in order to address drainage issues, given that drained out peatland areas make less effective carbon sinks.

I was involved in such matters when I was at East Ayrshire Council, and it is not that complicated. It just requires a bit of resource and the agreement of landowners in taking the work forward. Peatland restoration is definitely deliverable, and it should be promoted. I hope that that answers the question.

The Convener: Would Iain McDiarmid like to come in on Miles Briggs's question about renewables?

Iain McDiarmid: Yes; it is an interesting point. We have a very large wind farm being constructed in Shetland at the moment. There was a lot of local opposition to it, and one of the issues was the impact on peat and whether the carbon emissions from the removal of peat would outweigh the benefit of the renewable energy. The development is still raising issues on a daily basis.

The policy in the national planning framework sets the right direction. As always with planning, it is about the balance: we cannot say that, based on the policy, one development is definitely okay and another is not okay; it is when we get into the nitty-gritty of the environmental impact assessment, for example, that we can focus in on whether a development is acceptable.

Some parts of policy 33 might be a bit too open ended. For example, it says that a development can be supported if it is about

“supporting a fragile population in a rural or island area”.

That is fairly open ended. I can see that a range of developments on peatland could be justified on

that ground alone. There might need to be a bit of fine tuning in that regard. However, the policy sets the right direction on the need to protect peatland, carbon-rich soils and habitats.

As Craig Iles said—and from what I have seen of the Viking Energy development—the quality of the site restoration is an important factor. That can be developed through the planning conditions and assessed as part of monitoring the development.

Miles Briggs: The development of the national planning framework is the opportunity to demand of all councils that we meet our renewable energy targets. Will NPF4 help you to do that? There will be more difficult and challenging issues. For example, many communities will come to you with objections to larger wind turbines, but the job of meeting the targets has really been given to planning departments. Will you have the tools to help you to deliver in that regard? This is a national mission across Scotland, which planning departments are tasked to achieve. What would make the process easier? A lot of applications end up being called in by the Scottish Government because of the challenges. Will NPF4 make your job easier or more difficult?

The Convener: I see that Jane Tennant wants to respond.

Jane Tennant: I wanted to respond to the previous question, but I can also comment on the targets. We have focused on wind, but from an environmental management perspective, I can say that it is about a mix of project types and scales. It is about decentralising a lot of our energy to district or neighbourhood level, through heat and power schemes, heat pumps and so on. There are a variety of ways in which we can meet the targets; it is not all about wind, although wind is one part of it.

Pam Ewen: A lot of Government consultations have come out at the same time. Heads of Planning has looked at the one on the wind strategy and the Government's ambition in that regard. Perhaps the national planning framework needs to provide a bit more evidence—I have not seen it in there—of Scotland's capacity to accommodate the number of wind turbines that are the aspiration, in the context of the targets that have been set. A lot of work has been done on that over the years. What is the country's capacity, what is the target, and do the two equate? Just now, planning authorities do not know whether they equate.

In previous years, a lot of work was done on landscape capacity, and councils and planning authorities in some areas of Scotland said that they felt that they were at capacity. There is a dialogue to be had about the way that we want those developments to come forward.

11:00

Touching on Jane Tennant's point, it is about much more than wind turbines and new wind farms. Should we put more into repowering existing wind farms that are already consented to and just need to be looked at in a different way? A range of energy storage and local heat energy systems are coming through the NPF, and a related consultation and order has been drafted on that.

All those things are coming together and we need to understand how that relates to place at different scales, whether it is the national level, the city region level or the local and community level. It is a complex area, but the NPF could have more evidence behind it in relation to wind turbines and the capacity of the country to accommodate the ambitions that have been set out outwith the NPF.

Craig Iles: The driver of the policy in NPF4 is to derive more from renewables energies and suchlike, which is a very positive thing. There is a belief that the impact of that is disproportionately felt by certain councils in more rural areas, such as the Ayrshire councils, Dumfries and Galloway Council and South Lanarkshire Council.

That goes back to a point that was discussed earlier about things that are missing from the plan. The United Nations Educational, Scientific and Cultural Organization's Galloway and Southern Ayrshire Biosphere is not mentioned at all in NPF4, but it is important for us in relation to tourism and from an ecological point of view. How that ties into the provision of wind farms and renewable energy in those areas—there is a lot of overlap—is a challenge. We would like to see that given more significance in the document.

There is an impact on our resources when a wind farm application comes in, because although the energy consents unit deals with the larger ones, we are still a consultee in that process. That is a huge amount of resource for us: if we object, it goes to a public inquiry, which can take one of our officers out of other processes for a considerable number of weeks. It usually comes down to the landscape impact on local properties in the area of the wind farm.

In relation to the overarching element, we are keen on renewable energy; the net zero drive and saving the planet is a huge factor for everybody and everybody believes that that is important, but I am not sure that the burden is necessarily shared across the entire country. That is all that I would like to say on that.

The Convener: Thank you for mentioning the UNESCO biosphere. It is important to note that.

Before I bring in David Dunne, I note that we are running over time. I will let the meeting run until

11:15 and try to stop us at that point. It is clear that we have a lot to discuss here.

David Dunne: I absolutely respect the timing. I will pick up on Craig's last point, which ties in nicely with what Jane Tennant mentioned earlier about the heavy lifting that many rural authorities have to do to supply renewable energy to the country. Equally, there is a role in urban areas such as mine to try to decarbonise the heat and energy that we use.

Going back to Steven Heddle's point about the low-carbon heat guidance, which has been worked on for some time, and the lack of reference to that in NPF4, that could have a huge impact on decarbonising the energy that we use, particularly in our urban areas. We are fortunate to have three heat networks across the city. One is run by the council, one is run by the national health service and another is run by the university. However, we need support—NPF4 could form part of that—to scale those up. There is a real opportunity there.

Hydrogen is mentioned several times in the document, which is welcome to see. Not just green hydrogen but its other less-clean forms will be important in our decarbonisation journey as we move towards net zero. It is interesting that, although there are 22 references to hydrogen throughout the document, when you get to the green energy policy section, there is only one reference to it, which is in the preamble. There are no references to hydrogen in the policies themselves, yet there are lots of references to wind, solar, carbon capture and storage and so forth. In and of itself, that puts pressure on rural authorities to carry the burden. Hydrogen can be and is being developed in more urban areas, but there are certainly opportunities to expand that further, as we are doing with BP, with the hopeful connection to offshore renewables. I encourage wider reference to hydrogen and heat networks throughout the document.

The Convener: It is helpful to get the specifics of the scenarios in Aberdeen. I will bring in Iain McDiarmid, then move on with a couple of closing questions.

Iain McDiarmid: I just want to point out that the NPF covers only development that comes under planning legislation, which is perhaps why there is such a focus on onshore wind. It misses out offshore wind, tidal and wave power. That highlights the point that we were making earlier about the need to tie up with other plans and strategies such as the national marine plan to ensure that those things are knitted together.

The Convener: Thank you for being so succinct in your response.

I have a question on land assembly. Witnesses, including Planning Democracy and the Scottish

Land Commission, have argued that NPF4 goals can be delivered only if the public sector takes a far more proactive role in land assembly and development. Do you agree with that and, if so, what needs to change for that happen? I am not quite sure who to direct that question to. Perhaps witnesses could put an R in the chat if they have a response and I will take a couple of responses.

Pam Ewen: We have touched on that throughout this morning, particularly when brownfield sites or sites in town centres were the focus of our discussion. In areas of low land value, where it is not commercially viable to develop a site or where the risks are too high to a business—*[Inaudible.]*—greater scale come in to drive forward the development of such sites, whether that is in assembling land or giving confidence to a developer to pick up a site that already has infrastructure and has been decontaminated or whatever the site's issues are. Sometimes, that can be about the public sector doing the physical works and, sometimes, it can be about financially assisting the private sector to go in and do the works. There are different ways of achieving it. What has come out this morning and in other evidence sessions that the committee has held is that we will need public funding to get the scale of ambition to bring forward brownfield redevelopment in general and the repurposing of sites.

The Convener: I note that Craig Iles said earlier that, with that kind of power, you need a plan, and then you need time and resources.

Are there any other specific improvements that could be made to the draft that have not already been highlighted during the evidence session or in your written submissions? We have covered a lot, but there might be something else that you really want to tell us today. You can put an R in the chat for that.

Jane Tennant: Going back, perhaps, to the issue of renewables—and perhaps with my day-job hat on—I would just point out that the concept of cross-boundary issues is missing from a lot of the policy. Such issues will arise with, say, large-scale wind farms; indeed, anything involving a network will most likely involve cross-boundary issues. It is a matter for RSSs, and I just think that NPF4 needs to cover it a little bit more. After all, things do not necessarily happen within one local authority boundary area.

The Convener: Thank you very much for making that pretty crucial point. I will take Pam Ewen, to be followed by Iain McDiarmid and Craig Iles.

Pam Ewen: I just want to make two very brief points, the first of which is on an issue that we have not touched on today. HOPS considers that

the draft NPF4 is missing a part that would set out the economic and population characteristics for 2045 to ensure that the strategy can be seen in its wider and fuller context.

A second and, perhaps, more technical point with regard to how this is going to work relates to the transitional arrangements. There is an on-going consultation on the local development plan regulations, but we will want to be very clear about how the transitional arrangements will work and how they will take us into the new-style development plans under the NPF as well as local development plans. Local authorities are a bit concerned about the proposed transitional arrangements, and we need certainty about how they will move forward.

Iain McDiarmid: I just want to highlight policy 31 on rural places, which we have not really spent a lot of time talking about. [*Inaudible.*]—for example, brownfield sites in urban developments. We, Orkney and the Western Isles are particularly concerned about the proposal to resettle previously uninhabited areas, as our uninhabited or remote areas have very limited or no access to transport, schools, healthcare facilities, waste collection and digital connectivity. There is also the potential for conflict with policy 32 on natural places and, indeed, conflict between the protection of good-quality land, 20-minute neighbourhoods and sustainable development, given that a lot of our good-quality land is close to existing settlements.

On housing, I point out, with regard to developer contributions and the proposal to give 25 per cent of developments over to affordable housing, that the only volume house builders in places such as Shetland are housing associations, which deliver affordable housing by default. In looking at the future of development in rural places, we need to remember that there is no one-size-fits-all approach to housing types, tenures and so on.

Thank you for the opportunity to comment, convener.

The Convener: Thank you very much—that was very helpful.

Craig Iles: I just want to make two points. First, we have not touched at all on national developments in this morning's discussion. NPF3 had Prestwick airport and the spaceport around about it as a national development, but they have disappeared from NPF4 and we do not know why. The spaceport is an important development that is coming through, but it is just not there.

Secondly, the document refers to the importance of the Glasgow City Region Deal and then talks about the Ayrshire Growth Deal as if it were a secondary element serving the Glasgow

area. Obviously we stand on our own two feet and are important in that regard.

The Convener: Thank you for those two important points. We will absolutely take them on board.

I want to thank our witnesses for their evidence. I have had a lot of questions in my mind and we have already taken a lot of evidence, but I feel that this evidence session has really helped fill in some gaps. I am sure that my colleagues have found it very useful, too.

We now move into private session.

11:14

Meeting continued in private until 12:26.

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