

CAIRNGORMS NATIONAL PARK AUTHORITY

FOR INFORMATION

Title: NATIONAL PLANNING FRAMEWORK 4 UPDATE

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Purpose

1. To update and inform the Committee on the current status of National Planning Framework 4¹ (NPF4).

Background

2. National Planning Framework 4 will be the long-term plan for Scotland that sets out the Scottish Government's vision of where development and infrastructure is needed up to 2045. Work began on NPF4 in 2020 and it is designed to be considerably different to the current NPF3² which, along with Scottish Planning Policy³ (SPP), were published in 2014. NPF4 will incorporate an updated SPP and will therefore contain detailed national policy on a number of planning topics as well as an overall spatial strategy.
3. On November 8th 2022, a revised version of the NPF4⁴ was laid before the Scottish Parliament for approval. Once adopted by Scottish Ministers NPF4 will be part of the statutory Development Plan system, and be used to guide planning decisions across Scotland in a more explicit way than the current SPP or NPF3.

National Planning Framework 4

4. The Revised NPF4 is divided into three sections:
 - a. Part 1 – A National Spatial Strategy for Scotland 2045
 - b. Part 2 – National Planning Policy
 - c. Part 3 – Annexes
5. This report highlights some of the significant points within NPF4 for the Cairngorms National Park from parts 1 and 2 of NPF4.

¹ <https://www.transformingplanning.scot/national-planning-framework/>

² <https://www.gov.scot/publications/national-planning-framework-3/>

³ <https://www.gov.scot/publications/scottish-planning-policy/>

⁴ <https://www.transformingplanning.scot/national-planning-framework/revise-draft-npf4/>

6. A delivery programme⁵ to guide how NPF4 will be implemented by all relevant stakeholders will be published alongside NPF4.

NPF4 Part I – A National Spatial Strategy for Scotland 2045

7. NPF4 sets out the following six overarching spatial principles:
 - a. **Just transition.** We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.
 - b. **Conserving and recycling assets.** We will make productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy.
 - c. **Local living.** We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.
 - d. **Compact urban growth.** We will limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.
 - e. **Rebalanced development.** We will target development to create opportunities for communities and investment in areas of past decline, and manage development sustainably in areas of high demand.
 - f. **Rural revitalisation.** We will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.
8. These principles are intended to play key role in delivering on the United Nations (UN) Sustainable Development Goals⁶ (SDGs) as well as Scottish Government's National Outcomes⁷.
9. To reflect the diverse character of Scotland's character, assets and challenges, NPF4's Spatial Strategy is intended to be taken forward in different ways across the country. To guide this, five broad regions are identified with their own spatial priorities. These will inform the preparation of regional RSSs and LDPs by planning authorities.
10. The CNP is located within the North region which covers the Highlands of Scotland, Moray, mainland Argyll, northern parts of rural Stirling and Perthshire. The National Park is specially described as "*a national asset with internationally significant habitats and landscapes*". According to the NPF the region can continue to make a strong contribution towards achieving Scotland's net zero target and can help Scotland become a nature positive country by demonstrating how natural assets can be managed and used to secure a more sustainable future. By guiding RSSs and LDPs in this area, the strategy aims to:
 - a. Protect environmental assets and stimulate investment in natural and engineered solutions to climate change and nature restoration, whilst decarbonising transport and building resilient connections.

⁵ <https://www.transformingplanning.scot/national-planning-framework/delivery-programme/>

⁶ <https://sdgs.un.org/goals>

⁷ <https://nationalperformance.gov.scot/national-outcomes>

- b. Maintain and help to grow the population by taking a positive approach to rural development that strengthens networks of communities.
 - c. Support local economic development by making sustainable use of the areas' world-class environmental assets to innovate and lead greener growth.
11. NPF4 includes 18 national developments to support this strategy These include single large-scale projects as well as networks of several smaller scale proposals that are collectively nationally significant. Regional Spatial Strategies (RSSs) and Local Development Plans (LDPs) are required to identify and support national developments which are relevant to their areas.
12. There are no specific national developments identified within the boundary of the Cairngorms National Park (CNP). However, there are a number of Scotland wide national developments that the Cairngorms National Park Authority (CNPA) and its partners may need to take account of and help deliver, namely:
- a. Pumped Hydro Storage
 - b. Strategic Renewable Electricity Generation and Transmission Infrastructure
 - c. Circular Economy Materials Management Facilities
 - d. National Walking, Cycling and Wheeling Network
 - e. Digital Fibre Network

NPF4 Part 2 – National Planning Policy

13. The section contains 33 national policies grouped under three broad themes, namely Sustainable Places, Liveable Places and Productive Places. Along with each policy a statement of intent, a list of outcomes and information on how LDPs should take account of the policy area is provided.
14. While it is intended that all policies be used together, greater weight appears to be given to Policy 1: Tackling the climate and nature crisis. The policy states that when considering all development proposals significant weight will be given to the global climate and nature crises.
15. There do not appear to be any significant conflicts between the policies of NPF4 and those of the current LDP and NPPP. In many areas they will help support the ambitious aims set out within the Cairngorms National Park Partnership Plan (NPPP) as well certain projects to be delivered through the Heritage Horizons – Cairngorms 2030 project.

Relationship with National Park Partnership Plan

16. The Planning (Scotland) Act 2019 introduced a new approach to strategic planning with the introduction of Regional Spatial Strategies (RSSs). According to Scottish Government these new arrangements are expected to support better alignment with other strategies and decisions at a regional and subnational scale. Therefore, RSSs are considered to be in a strong position for supporting the implementation of NPF4.

17. The National Park Partnership Plan 2022-27⁸ is the Regional Spatial Strategy for the Cairngorms National Park. It sets out the long-term spatial strategy in terms of strategic development, in the context of the wider range of priorities identified to deliver the aims of the National Park in a collective and coordinated way. It therefore provides the strategic context for the Local Development Plan.

Implications for next Cairngorms National Park LDP

18. Once NPF4 is adopted by Scottish Ministers the CNPA will have five years to adopt a new LDP. The next LDP will be developed in accordance with the provisions of the Planning (Scotland) Act 2019 which introduced a new LDP system. The new style LDP is expected to be place-based with a greater emphasis on maps, site briefs and masterplans, with minimal policy wording. It is envisaged that the policies and proposals within the LDP will be focused on places and locations, working within the context provided by NPF4.
19. New regulations and guidance that will provide more detail on how the new LDP system will work in practice are yet to be published in their final form.

Implications for Housing Policy in next LDP

20. Policy 16 is the main policy covering the delivery of housing and while many principles have been carried forward from SPP their elevation to a part of the statutory development plan gives them additional weight in decision making.
21. The Policy requires that the onsite provision of affordable homes be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where the proportion may differ. Significantly, the policy is explicit about the ability of LDP's to require a higher contribution if justified by evidence of need. This is a stronger wording than currently within SPP, which states that the level of affordable housing "should generally be no more than 25% of the total number of houses." (SPP, para 129).
22. The Policy therefore supports NPPP's action to use the next LDP to identify further locations where more than 25% affordable housing is required and bring this up to 75% affordable overall.
23. One of the significant changes from NPF3 and SPP is the inclusion of greater direction on the level of housing land required in LDPs. NPF4 sets out a 10-year Minimum All-Tenure Housing Land Requirement (MATHLR)⁹, which is the minimum amount of land, by reference to the number of housing units, that is to be provided for a 10-year period by each planning authority (see NPF4, Annexe E).
24. Table I provides information on the MATHLR for the Cairngorms National Park, which will need to be taken account of in the next National Park's next LDP. For

⁸ <https://cairngorms.co.uk/working-together/partnershipplan/>

⁹ An explanatory report for the MATHLR has been published alongside the revised NPF4: <https://www.gov.scot/publications/national-planning-framework-4-housing-land-requirement-explanatory-report-addendum/>

reference the Housing Land Requirement (HLR) as set out in the Cairngorms National Park LDP 2021, which is also expressed in housing units, is also provided.

Table 1 NPF4 10-year Minimum All- Tenure Housing Land Requirement and CNP LDP 2021 Housing Land Requirement.

NPF 4 10-year Minimum All- Tenure Housing Land Requirement	
Total 10-year MATHLR	850
CNP Local Development Plan 2021 Housing Land Requirement (including 10% flexibility allowance)	
HLR 2020-2024	484
HLR 2025-2029	335
HLR 2030-2039 (indicative target)	648
HLR 2020-2024 + 2025-2029	819

25. The MATHLR represents the minimum requirement for housing land and it is expected that the LDP's Local Housing Land Requirement (LHLR) exceed it. To reach that LHLR the CNPA LDP will be informed by the Housing Need and Demand Assessments, Housing Land Audits and Housing Strategies produced by the Local Authorities covering its area. The exact LHLR is therefore still an evidence-based policy decision that lies with the CNPA.

26. Rural housing development is covered in Policy 17. Overall, the criteria are more demanding than those in the current CNPA LDP (2021). However, NPF4 states that LDP's should identify remote rural areas using Scottish Government's 6-fold Urban Rural Classification 2020. Except for Aviemore, which is identified as a Remote Small Town, the whole of the CNP is identified as Remote Rural classification. The Policy contains a generally permissive approach to rural housing which states that new homes will be supported where the proposal supports and sustains existing fragile communities, supports identified local housing outcomes and is suitable in terms of location, access, and environmental impact. NPF4 also appears to support LDP's taking local factors into account through being "...informed by an understanding of population change over time, locally specific needs and market circumstances...", and by setting out "... tailored approaches to rural housing ...".

27. Within the information provided the North region the negative impact of second homes is recognised with the statement: "*Demand for development, including in pressured areas, will require a planned response to minimise the impact of second homes on local communities and ensure new homes are affordable and meet local needs*" (NPF4, page 125). However, NPF4 does not provide any tools to directly control the use of dwellings as second homes.

28. Policy 30, which covers matters relating to Tourism, strengthens the policy position on short term lets stating that the reuse of existing buildings will not be supported if the proposal will result in "*An unacceptable impact on local amenity or the character of a neighbourhood or area*" or "*The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits*".

Wind Energy

29. Policy 11 which deals with energy development maintains the position that windfarm proposals in National Parks and National Scenic Areas (NSAs) will not be supported. Policy 4 on Natural Places continues to provide the same level of protection for National Parks as national designations as set out in the current SPP.
30. However, in areas outside these areas the policy tests associated with landscape impacts have been relaxed to support wind energy developments. Policy 4 on Natural Places now also explicitly supports development in wild land areas that contributes towards renewable energy targets. In overall terms this is likely to increase the numbers of wind farm proposals in areas around the National Park to meet national targets.

Next Steps

31. The Planning Committee will be informed when NPF4 is adopted and once it is adopted reports to Planning Committee will include reference to relevant policy as part of the statutory development plan.

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Links:

<https://www.transformingplanning.scot/national-planning-framework/revised-draft-npf4/>