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Dear Ariane

Second Annual Review of the National Planning Framework 4

Thank you for sharing the Committee's conclusions and recommendations following its second annual review on National Planning Framework 4. As ever, your interest in NPF4 is very valuable and I appreciate that the Committee feels a shared sense of responsibility for its implementation, given the important role that you played in scrutinising and improving the policies and proposals prior to its adoption.

This letter provides an outline of the progress we are making on the matters you have raised as priorities. Alongside this, a more detailed explanation can be found in the latest version of the NPF4 Delivery Programme, which we are preparing to publish in the coming weeks.

Resourcing of planning departments

I agree with the Committee that planners are doing some excellent work across Scotland, and I am very grateful for their commitment and vital influence on Scotland's places and people. I also agree there are continuing challenges with the resourcing of planning services and the Scottish Government is committed to actions that will have a positive impact on resourcing and service delivery, both in the short and long terms. Although responsibility for this lies primarily with local authorities, the Scottish Government has made significant steps to support capacity over recent months.

We fund and work closely with the National Planning Improvement Champion, have established the Future Planners Programme and have driven forward a Skills Commitment Plan and efforts to boost recruitment in the last year. As an innovative solution led and funded by the Scottish Government in close partnership with the Improvement Service, the

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National Planning Hub is also providing targeted access to specialist expertise to assist authorities. The Hub is already having a positive impact where planning authorities have identified pressures, by providing practical and financial help as well as by supporting the sharing of expertise and resources. We also continue to explore scope to make the process more efficient, including by promoting more consistency and proportionality in practice; for example, we recently wrote to planning authorities stressing the need for proportionality, particularly in asks of SMEs.

In noting comments comparing fee income in Scotland to that in England and Wales, it is important to recognise that while the maximum planning fee in England and Wales is more than double that of Scotland, in many cases, fees for comparable developments (up to the maximum fee) are higher in Scotland.

Assessing the impact of fee income is complex. However, evidence from local authorities indicates that there is significant variation across the country; authorities receiving a greater share of major development applications tend to generate more income and benefit from economies of scale. I think it is important to recognise that the maximum fee only applies to the very largest developments, while major developments account for approximately 1% of all planning applications in Scotland.

We are working with HOPS to gain a deeper understanding of how planning fees contribute to the overall resourcing of planning departments.

Implementation of NPF4

As previously stated, National Planning Framework 4 policies should be read and applied as a whole. There is no hierarchy of policies, nor should there be in the proper operation of the planning system. It is the job of the planning officer and the decision-maker to consider all of the relevant policies, recognising that for any application there will be policies for and against the proposal. Contradictions are to be expected and are normal in weighing up these considerations.

I recognise the point you have made about practice varying, with some planning authorities being viewed by stakeholders as inflexible or overly detailed in their application of the specific policy wording. Whilst consistency is important, this has to be balanced with the need to allow for discretion in the system so that specific local circumstances can be taken into account as part of the assessment of each application on its individual merits.

We have already worked with authorities to build their confidence in applying several of the key policies and will continue to follow up on with them as appropriate. As you have noted, Policy 22 has generated debate which we have now sought to resolve in the recent letter I co-signed with the Chief Planner. We have no plans to issue further guidance on local living and flood risk at present. As we committed in our Programme for Government this year, we are, however, working with the key agencies through rapid audits to identify opportunities to rationalise and improve their planning functions. We are also taking steps to remove outdated guidance from our collection of resources.

The latest version of the Delivery Programme will provide more detail on the guidance which is already available to support NPF4.

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NatureScot is the lead agency taking forward work to bring forward an Ancient Woodland Register. Earlier this year NatureScot set up a steering group consisting of representatives from Scottish Forestry, Forest and Land Scotland and the Woodland Trust to help oversee this project.

Enforcement and biodiversity

Planning authorities are responsible for ensuring that planning conditions are complied with in practice. We do not currently monitor enforcement activity by planning authorities, much of which is discretionary and frequently involves informal actions. However, we will engage further with stakeholders on biodiversity issues in practice, and I can advise that officials are due to meet with Planning Democracy representatives later this month. With regard specifically to Policy 3 on biodiversity, however, we are currently finalising guidance on this which should assist with implementation. The Planning Hub is also providing the offer of support to authorities on ecological expertise where there is a need for this; work is currently ongoing across several authorities for this type of support.

Local Development Plans

I acknowledge and recognise the issues the Committee has raised about local development planning. The current state of play is that 6 planning authorities have had Evidence Reports now signed off and further 4 having prepared Evidence Reports which are under consideration. A session with local authorities on Evidence Reports has now taken place, and we have recently issued further guidance which builds on lessons learned and sets out the minimum requirements more clearly.

The Scottish Government recognises the importance of ensuring that all authorities have in place up-to-date LDPs. This is proving challenging for a number of reasons, including the capacity of planning teams and the renewed focus on an evidence based approach, which is a vital component of having effective, deliverable place-focused plans. Earlier this year, we required planning authorities to provide us with updated information of their intended timescales on a six-monthly basis.

Local Place Plans

During the scrutiny of the Planning (Scotland) Act 2019 and in the preparation of the subsequent regulations, we endeavoured to ensure that the process for preparing local place plans was as minimal and flexible as possible. We have always been clear that there is no dedicated source of funding for LPPs, as communities can make use of wider funding streams to support their activities. As required by the legislation we will embark on a fuller review of LPPs from summer 2026, and we will explore the issues you have raised as part of this.

Housing Emergency

As you have noted, there are many factors influencing housing delivery. However, planning has an important part to play in making it easier to build more homes which are needed. Our work in the last year has focused on 23 actions relating to policy, delivery, efficiency and capacity. We have progressed all of these actions and those requiring further work have been rolled forward into the recently published Housing Emergency Action Plan.

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Our work on stalled housing sites has been undertaken together with Heads of Planning Scotland, Homes for Scotland, the Scottish Federation of Housing Associations and the Scottish Property Federation. This has provided insights into the barriers to delivery, which we continue to tackle including by working with partners to unlock a number of large sites. We are also building on action to date by publishing a consultation on mechanisms to accelerate housing delivery this autumn.

In the meantime, we are actively monitoring housing applications on non-allocated sites, to build a stronger evidence base on the impact of Policy 16 in practice. This provides scope for Ministers to intervene, should the evidence suggest this is required.

Accessibility of NPF4 and related documents

I agree that considerable work has been done to support the implementation of NPF4 and that it would be useful to gather this into a more accessible format. The latest version of the Delivery Programme will provide a comprehensive report on progress to date, and we will bring this together with our ongoing work to rationalise planning guidance, to ensure information can be more easily accessed by users of the system.

Impact assessment

Our work on monitoring NPF4 will be set out in the latest version of the Delivery Programme. We agree that outcomes resulting from policies and decision-making are important to understand. It will, of course, still take time to see the legacy of the policies in our places and communities, given development timescales.

I hope the Committee finds this update helpful, and may I thank members again for the Committee's continuing interest in the delivery and outcomes from NPF4.

Yours sincerely,

IVAN McKEE

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