



OFFICIAL REPORT
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Local Government, Housing and Planning Committee

Tuesday 17 June 2025

Session 6



The Scottish Parliament
Pàrlamaid na h-Alba

Tuesday 17 June 2025

CONTENTS

	Col.
DECISION ON TAKING BUSINESS IN PRIVATE	1
NATIONAL PLANNING FRAMEWORK 4: ANNUAL REVIEW	2
11:38	
ON RESUMING—	
SUBORDINATE LEGISLATION.....	35
Valuation (Proposals Procedure) (Scotland) Regulations 2025 (SSI 2025/146)	35
Town and Country Planning (Fees for Appeals) (Scotland) Amendment Regulations 2025 (SS1 2025/166)	35

LOCAL GOVERNMENT, HOUSING AND PLANNING COMMITTEE

19th Meeting 2025, Session 6

CONVENER

*Ariane Burgess (Highlands and Islands) (Green)

DEPUTY CONVENER

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

COMMITTEE MEMBERS

*Meghan Gallacher (Central Scotland) (Con)

*Mark Griffin (Central Scotland) (Lab)

*Fulton MacGregor (Coatbridge and Chryston) (SNP)

*Emma Roddick (Highlands and Islands) (SNP)

*Alexander Stewart (Mid Scotland and Fife) (Con)

*attended

THE FOLLOWING ALSO PARTICIPATED:

Dr Caroline Brown (Royal Town Planning Institute)

Pamela Clifford (Heads of Planning Scotland)

Neil Sutherland (MAKAR Limited)

Clare Symonds (Planning Democracy)

CLERK TO THE COMMITTEE

Jenny Mouncer

LOCATION

The David Livingstone Room (CR6)

Scottish Parliament

Local Government, Housing and Planning Committee

Tuesday 17 June 2025

[The Convener opened the meeting at 09:32]

Decision on Taking Business in Private

The Convener (Ariane Burgess): Good morning, and welcome to the 19th meeting in 2025 of the Local Government, Housing and Planning Committee. I remind all members and witnesses to ensure that their devices are on silent.

The first item on our agenda is to decide whether to take item 4 in private. Do we agree to do so?

Members indicated agreement.

National Planning Framework 4: Annual Review

09:33

The Convener: The next item on our agenda is an evidence-taking session as part of our annual review of the operation of the fourth national planning framework. We are joined in the room for this item by: Pamela Clifford, chair, Heads of Planning Scotland, otherwise known as HOPS; and Dr Caroline Brown, director of Scotland and Ireland, Royal Town Planning Institute. Online, we are joined by: Clare Symonds, chair, Planning Democracy; and Neil Sutherland, founding director, MAKAR Ltd. I welcome our witnesses to the meeting.

We have about 90 minutes for this discussion. Before I turn to questions, I want to acknowledge that planners across Scotland are doing the best that they can in changing circumstances. I want to put that on record, because while we are scrutinising and talking about challenging situations, I want to recognise the workers who are doing such important work for us.

I will start with an overarching question, which I will throw to you first, Caroline. Is there evidence that NPF4 is helping to deliver developments that actually support the six spatial priorities, such as compact urban growth and rural revitalisation, and, if not, why might that be the case? It is not a small question.

Dr Caroline Brown (Royal Town Planning Institute): It is not a small question, is it? The point at the start of your question, which was about evidence, is important. It is hard to say that, yes, there is evidence, because one thing that we know about planning is that it takes time. Although NPF4 has been in situ for two and a half years, it is still quite early in planning terms.

There are some signs that things are changing. Conversations are certainly being had about the spatial principles and living well locally—you might come on to 20-minute neighbourhoods in that regard. The fact that such conversations are happening is evidence in itself that things are changing, but we have to say that it is still early days on the ground, which might be because of the time lag. Projects are in the pipeline now but are still being worked out. Things are being consented and granted permission, but they are not yet on the ground and will take several years to come to fruition.

Cities and places change slowly. We have to recognise the long-term nature of the way in which planning affects the built environment. It is not a

short-term thing, so seeing an impact in a very short space of time is unlikely.

The Convener: We reviewed NPF4 last year. It was too early to do so, and I have a feeling that that will be similar thread in this session. Does anyone else want to come in on that, particularly regarding the evidence that we are seeing the six spatial priorities begin to appear in urban and rural revitalisation?

Pamela Clifford (Heads of Planning Scotland): Having worked on the ground in this area—I work in a planning authority and have worked in another planning authority—I think that NPF4 has definitely strengthened the planner's hand. I agree with Caroline Brown that it is hard to evidence that on the ground, because developments take time to come to full fruition. The issues of biodiversity, landscape and climate change are really at the forefront now. In the past, landscaping and biodiversity were often seen as an afterthought, but we are now seeing developers come forward with proposals that place those things at the forefront.

I am a real supporter of the presumption in favour of using brownfield land, which is strengthening the hand of the planning authorities, which I know we will come on to later. However, the new local development plans will be different from what we have had. We want to see a lot of focus on the use of brownfield land, vacant sites and vacant buildings, which we will probably come on to later. As you know, NPF4 is a big, bold and ambitious document, but such a document comes with shortcomings, which take time to work through.

Neil Sutherland (MAKAR Limited): Hello, everyone. Just to clarify my position, I am not currently a director of MAKAR Ltd; I am the founder.

I am four months into a sabbatical break, so that has given me a chance to reflect on a few things after many decades. My experience is in remote rural Scotland, and I believe that rural revitalisation, which is one of the six principles, could not be more urgent. The context is a housing and nature emergency. It is a significant issue and probably the principal headwind holding back economic development in the north. We might come on to that later.

Like yourself, convener, my remit here is to support the planning system as best I can. I recognise the challenges and difficulties in relation to planning and planners. However, the way in which NPF4 has been rolled out in the past few years has been problematic for rural developments. I can go into some detail on that if you wish.

Are things getting better? They will, although the timing is unfortunate, coming after the pandemic and Brexit. I am not sure how to say this subtly, but the way in which provisions were brought in affected my business. We are, essentially, a housing provider and manufacturer, and it had a significant negative impact on our business to the point at which we lost a great deal of potential work.

Are things recovering? One has to be optimistic, but I have to put on the record that the rolling out of the national planning framework has been extremely problematic for certain businesses, some of which have not survived as a result. That might sound a bit dramatic but it is the way that I see it.

The Convener: Thank you. Throughout the morning, we will be asking questions that will probably tease out some more of those issues.

Clare Symonds (Planning Democracy): NPF4 is full of good intentions but there are not always the wider mechanisms to deliver them. For delivery, it would be good to think of things such as resourcing planning, and I know that there has been a lot of talk about where that resourcing is going. Is it just going to the development management side, or is it helping with the policy side or the enforcement side, for example, or with the broader mechanisms such as having biodiversity officers in local authorities to support those planning decisions in order to ensure that approvals are good and that they are laying the ground for good delivery?

I would like to see more emphasis on monitoring whether we are delivering good outcomes. I see a lot of focus on delivering lots of approvals and on the speed and efficiency of the planning system, but less work is being done on the difficult task of monitoring whether it is delivering development where we need it and whether it is delivering quality development. I would like to see much more work being done on that.

The Convener: I want to move on to the climate and biodiversity elements of NPF4, which people were excited about, and which Pamela Clifford has already mentioned.

The committee has heard concerns that a lack of guidance on assessing the climate and biodiversity impacts of new developments is hampering the delivery of NPF4 policy goals in those areas. Do you share those concerns? If that is the case, why is it taking so long to produce the guidance? Why was it not ready for the launch of the policies?

Pamela Clifford: That is one of the shortcomings. We have pretty strong climate change and biodiversity policies, but we do not have the guidance behind them, and different

planning authorities are interpreting the policies in different ways.

I cannot say why it has taken so long to produce the guidance. Some planning authorities are using the biodiversity matrix from England, while others are interpreting the policies themselves. I agree with what the lady from Planning Democracy said about the need to monitor that, because it is important to see how the policies are being interpreted on the ground by different planning authorities.

09:45

Planners like guidance on policy, as do our elected members when we put forward recommendations to them. Guidance would definitely be of assistance when it comes to the interpretation of those policies. NPF4 represented quite a shift because, previously, policies were made at the local planning authority stage; now, they are made at the national stage, so it is more difficult to ask what was meant when a policy was put together. Guidance would assist with that.

The national planning skills commitment plan looks at rolling out training on various aspects of the policies of NPF4, but it does not replace the provision of guidance on the ground.

Clare Symonds: We had some very good training from NatureScot when we put on our nature and planning webinar series this past winter. Stuart Bence from NatureScot is one of the people who are writing the guidance. He kindly gave us a good session in which he explained what he was doing. He is working on the guidance for local developments, as opposed to major developments, which are the subject of Government guidance. It was clear from that that it is an immensely complex area, so he has a lot of work to do. I think that he said that he was working on it for one day a week. Hardly any officers are helping to produce the guidance. That might be one reason for the delay. However, what he said about putting out a matrix to demonstrate whether biodiversity mitigation or enhancement is being delivered was very useful. That is needed, because those two things are being conflated in some of the decisions.

The other issue relates to training. I mentioned our nature and planning webinar series, but we do not get the feeling that a lot of training is being done, particularly in relation to biodiversity issues. The fact that quite a few planners and professionals came to our training was indicative of that. I thought to myself, "Why is a small non-governmental organisation covering this, when it should perhaps be delivered by others?" I am not sure how much training there is, especially for councillors, a few of whom I spoke to. I am not

sure that training for councillors is being rolled out, and when it is, no monitoring seems to be done; it is left up to them to do it. One councillor said that he did not remember biodiversity being mentioned at all. Therefore, I think that training might be an issue.

I would like to say something about biodiversity conditions, but I will leave it there for now.

The Convener: I have a question for you on that very subject, which I will put to you shortly.

Dr Brown: Guidance was published last week on policy 3—climate resilience—so we finally have something, but we have only just had it. I was involved in that as part of the technical advisory group, so I saw behind the scenes. It has taken us more than two years to get that guidance on what is one of the headline policies in NPF4. That comes back to the length of time that the process is taking. We share HOPS's concern about that.

There is also an issue to do with communications and transparency about the work that is being done and who is doing it. Clare Symonds mentioned the work of NatureScot in producing the guidance on biodiversity enhancement. We understand that there have been conversations about that and that the timelines potentially go well into 2026. That is a resourcing issue.

The Scottish Government is aware of that. There have been conversations about how we can bring things forward and speed things up. However, resourcing is needed, not just of planning authorities but of our key agencies in order to support their planning decisions as statutory consultees and, in this case, to produce the guidance that is needed to help officers, developers and members on the ground to make the decisions.

Pamela Clifford's point about the need to be able to interrogate the policy writers in order to understand the intention is critical. There is a lot of discussion about the wording and the exact intention of a number of the policies, which I am sure that we will discuss. It is really important that stakeholders can have those conversations so that they can move things forward and deliver the policy on the ground in the way that is intended. That does not always happen at the moment.

The climate and biodiversity policies are key policies—they are flagship policies. NPF4 is all about those policies, so why is the Government being so slow in getting the guidance to our colleagues and our members who are working on the ground? That is hard to fathom.

Having said that, I know that research was done to inform the climate resilience policy guidance. It would be helpful for people to have an

understanding of the work that is going on. Clearly, if benchmarking or research is being done, that has to happen before the guidance can be issued. However, it is quite a black box, in the sense that it is hard to understand what is taking so long.

The Convener: You mentioned the need to be able to interrogate the policy writers. “Interrogate” is quite a strong word. However, do you think that the Government should perhaps roll out a session that would create an opportunity to discuss things with the people who have written the policies? That could be similar to the sessions that Planning Democracy and Action to Protect Rural Scotland have held, where, for 90 minutes or a couple of hours, there is a show-and-tell and people can ask questions. All 33 of the policies could be covered, as well as, potentially, the national policy. There seems to be a bit of a void—there is a lot of wondering going on.

Dr Brown: That would be really valuable. It has been suggested that the national planning hub could create opportunities for local authorities to come and have a safe space, if you like, where they could ask questions about how they should interpret policies and what they mean, and talk to the Scottish Government about those specific policies.

The Convener: Okay. There is something to recommend there, I think.

I will come back to Clare Symonds. In its evidence, Planning Democracy highlighted concerns about an overreliance on planning conditions to deliver biodiversity goals and argued that conditions are often not complied with and that enforcement action is relatively rare. Do you have a sense that conditions are flouted? If so, what needs to happen to increase compliance with planning conditions?

Clare Symonds: I would like to refer to the important evidence that has been produced by Dr Kiera Chapman and Professor Malcolm Tait from the University of Sheffield as a result of their work on monitoring whether planning conditions are being adhered to. I am sad to say that they found that adherence was very poor—overall, they found that only 34 per cent of planning conditions were being delivered on the ground. We need to improve on the work that is done to look at what is happening on the ground. Even though a lot of paperwork is produced, everyone seems very busy and it looks as though biodiversity is being acknowledged and worked on, the on-the-ground delivery of conditions leaves a lot to be desired. That research related to England.

We need more effective and resourced ecological enforcement to be put in place so that biodiversity conditions are enforced. There

perhaps also needs to be less reliance on conditions. It is difficult to tell, but I do not think that I have ever seen biodiversity given as a reason to go against the principle of development and to refuse permission, even if a development will have a clear impact on nature. Permission is still being granted, post-NPF4, where there is a clear impact on nature, and I have seen planners and developers scrabbling around trying to get enhancements when it is clear that a development should never have been permitted in the first place.

We would like there to be far more ecological training for planners so that they understand how to write robust conditions, because some of it is in the writing. They need to know how to write into a condition that someone must deliver something in perpetuity for biodiversity and make it clear who will be responsible for that.

We have a concern about the reliance on communities to deliver biodiversity enhancements, which we have seen in a couple of planning conditions on developments that we have looked at. There might have been no discussion with the community beforehand, but the idea is that, through such planning conditions, the developer can gift some of the land to the community and they will cover up to 80 per cent of the biodiversity enhancements. There is no talk of whether the community wants to do that or how it will be resourced. That has sometimes happened in areas of multiple deprivation, so I do not know how the communities are supposed to do it, but that is one of the ways in which developers have been able to say, “Yes, we’re delivering on biodiversity.”

Much more thinking needs to go into the writing of conditions. In addition, that comes at the end of the planning process, but the work needs to be done much more up front. For example,

“a pre-works walkover survey to check for the presence of badger setts”

was put in a condition, yet you would think that such work should be done before making decisions about where the roads would go and so on. We would like to see much more up-front work in those kinds of circumstances.

I am going on. There is more in my written evidence, but I could carry on talking.

The Convener: That is very helpful. I have a follow-up question. Some of the written evidence has highlighted situations in which ancient woodland is being cut down in order to develop housing. As Neil Sutherland said very clearly at the start of the meeting, the challenge is in how to deal with both the nature emergency and the housing emergency. Do you have a sense that there is an understanding in planning departments that if you cut down ancient woodland, which

serves as a considerable climate and biodiversity resource—it sequesters carbon—it is irreplaceable? Replacing it with a few trees here and there is not a like-for-like replacement. What are your thoughts on that?

Clare Symonds: I would not like to judge the knowledge of the planners; I am sure that they are very knowledgeable. One of the reasons why we did our training was that, as a whole, people perhaps do not fully appreciate how ecology works. We are distanced from it nowadays, which was among the reasons why we encouraged people to go out and record biodiversity in their areas, to develop understanding and knowledge.

Planners need to be able to prioritise nature as well as to understand it. There has been a little sliding of the rhetoric; in the programme for government, for example, there is a restatement that

“Planning is at the heart of economic growth”.

10:00

We are coming back to a focus on delivering economic growth rather than on delivering good planning as a whole. That feels like backsliding on the rhetoric, which makes it hard for planners to make difficult decisions. If the pressure is on to deliver development or housing, and that is seen as the priority, it is very difficult for them to make a decision about that, whether or not they understand that the complexities in that ancient woodland habitat are such that those ecosystems cannot be replaced by a little bit of tree planting and that they are substantially more than that.

The Convener: Neil Sutherland has indicated that he wants to come in. We will then move on to questions from Mark Griffin.

Neil Sutherland: It is not an either/or situation in relation to development proposals. There is a tendency to assume that development is negative, but biodiversity enhancement can be delivered as a core benefit of development. Indeed, there could be something to be said for actively supporting proposals that are based on biodiversity enhancement as well as development itself. That is what we need to move towards. The context of Scotland, particularly of the Highlands, has been well known. Frank Fraser Darling used the term “a devastated terrain” to describe that in the introduction to his essay in, I think, 1952. We have a big job to do on ecosystem health and enhancement—there is no getting round that due to the historical context. However, things are improving: you cannot drive or walk through the hills without seeing the establishment of woodland and so on, so things are moving on.

There is a great deal more that we can do, but every time that there is a discussion, the idea comes up that we have to destroy something in order to develop, and that is not necessarily the case. It is worth saying that, with a lot of smaller-scale rural development, biodiversity enhancement simply comes along with the development—it actually improves the net gain.

The Convener: If anyone wants to come in on this stuff, perhaps you can include that in your other responses.

Mark Griffin (Central Scotland) (Lab): Good morning. Pamela Clifford, how has the introduction of the new minimum all-tenure housing land requirement—MATHLR—figures in NPF4 impacted on the identification of land for housing?

Pamela Clifford: There has been a lot of discussion about that, certainly in relation to work with Homes for Scotland as well with HOPS. Again, it is quite early to determine the outcome of that work, because we are in the middle of starting our new LDPs. Some of us are ahead of others on that. We will have to work together on that, including with Homes for Scotland, so I cannot give you a straight answer at this stage because we need to work through it.

Mark Griffin: Do you have an idea of the figures in the various planning authorities? The Scottish Government has been very clear that what is set out in the NPF4 is a minimum, so have planning authorities been bringing forward the minimum plus 1 per cent or plus 10, 20 or 30 per cent, for example? Do you have an idea of what each planning authority is doing?

Pamela Clifford: There have been discussions about the figures. In my previous authority, the required level is quite low, as is the case in the neighbouring planning authority. We pushed back on that, which led to an improvement. To be honest, I do not have in front of me the information on how individual planning authorities are taking forward those numbers, but I think that they are largely sticking to the minimum.

Dr Brown: The numbers vary hugely. With regard to MATHLR plus 1 per cent, we can probably all work out which authority or authorities that will be, but at least one authority has gone in that direction. However, I have also heard that some authorities have been much more generous in their land allocation. There is a wide range. There have been lots of calls for sites, so some authorities are still working through a lot of that in their LDP process.

Clare Symonds: It is an interesting issue, and I wonder what is behind the question, because the minimum all-tenure housing land requirement figure is based very much on a system that requires us to deliver a lot of land to developers to

build on, and yet a huge amount of land has already been allocated and has permission for housing—164,000 permissions have been granted—so I do not know why there is always a focus on how much land we are delivering rather than on what is being built out.

The MATHLR is really a continuation of relying on private sector house builders to produce a new supply of housing. That requirement continues—wrongly—to consider that the best way of resolving the housing emergency is through the private sector. The Fife housing need and demand assessment found that 4,200 units are required. The MATHLR requires each authority to increase the amount by up to 74 per cent, so the generosity figure is inbuilt, which means that an authority allocates a lot more land than is needed. For 4,200 units, enough land for 7,300 units is being asked for, and the local housing land requirement is even bigger than that—it is for 9,400 units. In that case, the amount of land is being increased, unit wise, by 124 per cent above the HNDA.

The justification for that is that market conditions mean that some planned developments probably will not go ahead for some reason, so more land needs to be allocated than is really needed. That is a highly inefficient way of doing things. Allocating such a large amount of land causes difficulty, because it produces uncertainty about where to target the infrastructure, for example, which is at odds with any planned route towards a zero-carbon future.

The question that we could perhaps ask of housing developers is how much land they would need to be allocated for the housing emergency to be over. The answer to that is rhetorical; they will never reach that point, because their business plans are based on having more and more land—it is a bit of a gravy train for them—so we need to ask who is benefiting from the approach of allocating loads of land to developers and the private sector to deliver housing.

Is it better, perhaps, to start thinking of alternative approaches? The Scottish Land Commission and even the CMA—I have forgotten its name; is it the competitive markets authority?—have recommended that we do much more land assembly and enable local authorities to deliver more housing themselves through land assembly mechanisms and compulsory purchase orders, which will allow the much more direct delivery of housing so that we do not have to allocate quite so much land. I would ask that you please focus on how much land is getting built out, rather than on how much we are allocating.

Mark Griffin: My second question deals more generally with the introduction of NPF4 and all the policies that it contains. In the context of the housing emergency, do you think that we will

deliver more houses under the NPF4 framework than we would have done under the previous version?

Dr Brown: That is an impossible question to answer. I would like to say yes. It strikes me that NPF4 was finalised before the housing emergency was declared. We all know that the housing emergency did not arrive overnight, and we were all acutely aware of the issues around housing and delivery at that point. However, NPF4 does not contain the words “housing emergency”; that was declared subsequent to its adoption. Does there need to be any tweaking to NPF4 to recognise that? That is a political decision and not for a planner such as me, but it is a question.

NPF4 is about the policies on what things should look like; it is not about the delivery. It does not control the financial context, the price of land, the appetite of investors or some of the non-land-based things that affect housing delivery, such as the measures that are in the Housing (Scotland) Bill. We know that the prospect of rent controls has affected investment decisions, and that certain developments for which planning permissions are in place will not now come forward, because the investors behind those schemes have walked away. That is to do with other policy—not with planning or NPF4—but we have to address it. Housing delivery is not all about planning policy; it is also about other things. That has an impact on the deliverability of housing through NPF4.

I hope that that has answered your question.

Mark Griffin: Thank you.

Pamela Clifford: In addition, it is about not just the numbers but the quality of housing. I feel strongly that we must not build the ghettos of the future and be back in 20 or 30 years to knock down those houses. NPF4 allows us to push for placemaking, getting good open space and addressing net zero. The flow of policy 16, which is robust on that, allows planning authorities, through the new LDPs, to revisit and examine sites that might have been in local development plans for 10 or 20 years to determine whether they are viable. If those sites have not been taken forward during that period and there is no prospect of that happening, they can come out of the new LDP, which might allow an alternative site to be progressed.

To go back to your question, therefore, I hope that NPF4 will allow us to provide more housing. The policy also allows for affordable housing. The lack of public subsidy has certainly been a barrier in taking forward affordable housing. I find that developers are very willing to provide affordable housing but that councils and registered social landlords do not have the financial mechanisms at present to take that forward. We have to look at

how we can deliver more affordable housing without public subsidy. That is a big issue to resolve and progress.

10:15

Neil Sutherland: The quick answer is that rural and remote rural Scotland absolutely needs more housing. I spoke about having a retake on the national priorities and NPF4 is a significant step forward in addressing rural housing in a wider context, including in areas that have previously been inhabited but are not now.

That links back to the discussion about biodiversity enhancement, ecological restoration and so on. There is a terrific opportunity, but it is one that is only starting to become obvious. Without naming too many of the local authorities that I work with in the north, there is a residual cultural feeling of resistance to housing in some areas, and that is baked into policy 17(c)(iii) of the NPF.

In remote rural Scotland, which is defined as being more than half an hour's drive from any settlement with a population of more than 10,000—which is more or less everywhere in the Highlands except for the area around Inverness—there is a presumption in favour of development. That, coupled with the positive things that can happen with development, is a terrific opportunity to get new settlements and new opportunities throughout the Highlands and Islands, and we must be positive about that goal in the months and years ahead.

That should be discussed more widely because there has not been enough promotion and understanding within communities that those opportunities now exist within planning. Throughout most of my working life—for the past 30-odd years—it has been very difficult to get housing in remote rural Scotland, but NPF4 encourages that, as far as I can see.

Clare Symonds: It was the Competition and Markets Authority that I was trying to think of previously. It said:

“The speculative housebuilding model means that private housebuilders do not collectively have the necessary incentives to build houses at the rate required to meet policymakers’ objectives.”

That is what I was trying to say earlier.

On carbon emissions, it is important to recognise that, should all the recommended 300,000 houses be built down in England, that would blow the entire carbon budget, because it would consume 113 per cent of England's cumulative carbon budget. New house building has massive implications for carbon budgeting, so it might be better if planning authorities were

required to identify buildings that have the potential to be reused, which would move us away from focusing on new builds to think about reusing existing buildings. There are 40,000 empty homes and 24,000 second homes in Scotland, so perhaps we should be looking at reusing those as well.

The Convener: The Government has at last recognised that final point about reusing existing buildings, and there was £40 million in the most recent budget for local authorities that have declared housing emergencies as well as an increase in the budget for empty homes officers from £0.5 million to £2 million. That is a good sign.

One of the challenges with using existing buildings concerns VAT on retrofit, about which everybody just nods their head and says, “Our hands are tied.” That does not make sense when we need to use our existing buildings.

I will now move on. I ask Meghan Gallacher to ask all her questions, and then I will bring in Alexander Stewart.

Meghan Gallacher (Central Scotland) (Con): Good morning. My first question is on targets for house building. We are in a housing emergency. There is a severe housing shortage and demand completely outstrips supply in all the different housing markets. I was interested in what Clare Symonds had to say about the 40,000 empty homes and the 24,000 second homes. I understand the points that she is raising but, even if those homes were to be brought back into use, that would not touch the sides of the present demand for housing and the need to build more homes if we are to tackle the housing emergency as a whole.

On that point, Homes for Scotland has asked for a minimum target of building 25,000 new homes each year to be established. How would that work, given that NPF4 has a presumption in favour of brownfield sites, which are of course more costly to build on, with serious issues in relation to the need to treat ground? Brownfield sites tend to be smaller development areas; they are not necessarily the larger areas that developers might need in order to tackle housing need in the areas concerned.

Pamela Clifford: I am passionate about and a great supporter of using brownfield sites. As you have said, they are often difficult to develop, but they are usually in the best locations. They are often adjacent to town centres and key services. It is difficult to deliver those sites but, my goodness, when you do deliver them there can be a great sense of satisfaction. I can talk only from my own experience in West Dunbartonshire, where an active private house builder was interested in

developing brownfield sites—we had some real successes there.

However, it is difficult to do that nationally and meet the minimum target for new houses to address the housing emergency. That does not mean allocating greenfield sites as well, because that gives rise to competition. Greenfield sites are usually easier to develop, although that gets more difficult if there are infrastructure requirements.

Planning authorities and councils need to work much more closely with the private sector and house builders to bring that work forward. From speaking to them, I am aware that there is probably a need for some form of subsidy to kick-start brownfield sites—but, my goodness, what they bring to the area. They bring new life to town centres—as I have said, they are much better located. We are all living longer, but our health and mobility are perhaps not so great. We need to consider that in relation to the provision of housing sites. We need to have more central housing sites that are close to existing services.

Dr Brown: We completely support the brownfield first policy, for all the reasons that Pamela Clifford has outlined.

However, as Meghan Gallacher acknowledged, brownfield development adds complexity and time—that is the tricky thing when it comes to targets. The planning system allocates the land and delivers the consents, but it does not control the building process. There are conditions that need to be discharged, and a lot of technical work often goes on once planning permission has been granted but before construction happens. It can take considerable time and money to resolve issues on brownfield land and contaminated sites before housing or new development can be delivered, and that is not always knowable ahead of time. There are therefore some difficulties in that regard.

As I said, there are some delivery issues that are outside the control of the planning system. We are very good friends with Homes for Scotland, but, as Clare Symonds and others have intimated, it has an interest in maintaining profits, and building lots of houses very quickly might not meet that need. Therefore, we also need to recognise that side of it—its members want to phase developments and guarantee returns and workstreams. There is a tension between setting a target and delivering it, and planning does not control all the aspects. On the points about public sector funding for affordable housing and who takes that on, again, non-planning-related issues around finance can get in the way and hold up delivery on the ground.

I acknowledge that some excellent work has been going on with the Improvement Service to

build a dashboard that shows where things have got to on housing land—the sites that are allocated, the sites that are constructed and the sites that are under construction or coming forward. That is a really helpful tool for planners and developers but also for the public and members to get a sense of what is happening in their local authority area. On my earlier point about visibility and transparency, the dashboard is a really useful tool. Some excellent work is happening to make that sort of information visible to all of us.

Clare Symonds: I very much agree with Caroline Brown and Pam Clifford on those points. I am not an expert on this, of course, but the indication is that, if the public sector gets involved in the purchase and assembly of land for development, it can recoup its money from that upfront investment in the land. A lot of good research is being done into how we might get Government to provide much more direct delivery of non-market housing, so that it perhaps takes on a bit more of the risk than the developers.

Really exciting stuff could be done. Rather than having public-private partnerships, we could consider public-community partnerships. Some really good stuff is being done on land reform and community empowerment. We hope that the issue will be considered as part of the local governance review, too. If that could be combined with planning considerations, we could get some really good and genuine community empowerment and involvement and help to shape public investment.

In order to achieve community-led development, there could be a link with local place plans through masterplan consent areas. We could see those differently: instead of seeing them as a way of simplifying planning, we could use them as an opportunity to create exciting new partnerships that might help to deliver housing in a way that we have not done for 20 to 30 years, because we have relied too much on the private sector.

Meghan Gallacher: I am completely supportive of what you have said about community empowerment and ensuring that communities are absolutely involved in development plans. We have local place plans, which communities are very much involved in. However, if we are not going to rely so much on the private sector, who on the public side of things is going to provide funding? That is the sticking point, as local government is completely up against it in terms of its finances. What are your thoughts on using public finance, rather than private finance, for developments? I do not think that we can have one without the other. We very much need the private sector to tackle the housing emergency.

10:30

Clare Symonds: Yes, that is kind of what I meant when I said that there are ways that the upfront investment could be recouped, maybe through greater capture of the uplift in land values and so on. I am not an expert on this, but good work is being done around that, and I can certainly follow up with recommendations of where to go and who to speak to, because I totally understand that the money is not there. However, we are relying on a system that is clearly not delivering housing. We have a housing emergency and yet we have big-volume house builders making vast, supernormal profits, with profit margins of up to 34 per cent. There is a mismatch, and we have to square that circle.

We need a willingness to look at and explore that. Rather than continuing to focus on listening to the needs of house builders, we need to listen to communities, because they do not have a voice or any rights in the planning system. Improving those rights and opportunities is part of the answer.

Neil Sutherland: I will build on the points made by Pamela Clifford and others about brownfield sites. Part of the issue is that, in the UK and in Scotland, we are overly reliant on the large house builders, which do not operate in rural areas—members are possibly aware of that. It is small to medium-sized companies, which have reduced in number, that are more likely to take on the smaller sites and, quite frankly, to make a good job of them.

The other point that I want to make is that the way that construction and house building are delivered is changing significantly. With my Offsite Solutions Scotland network hat on—the company that I founded is a member of the network—I can say that, with regard to the manner in which housing is being delivered, and linking up the wider social, economic and environmental considerations that are fundamental to strategic planning, we can use local supply chains, particularly timber supply chains in Scotland, to deliver very high-quality housing. That addresses Clare Symonds's point about carbon budgets, because it is possible to capture more sequestered carbon in these buildings than we produce in their delivery. We have proven that that is the case. Development can be part of the solution for net zero, not part of the problem, but we have to do things differently.

It comes back to that definition of madness. We expect a different outcome, but we keep using the same method. There are different ways to produce buildings. The key to that is public procurement and public-private partnerships and community partnerships together. It is an exciting area. We probably do not have time to talk about that much

more this morning, but, believe me, a lot of very interesting things are happening with regard to how to deliver very high-quality, high-performance housing at a cost that is equal to or lower than what is being delivered today as a result of the business and procurement models that are being foisted on us by the big housing delivery organisations. I am probably getting myself into big trouble, but I do not mind, because, frankly, it has to be said. It is the small to medium-sized companies that are doing the innovation. They are working on these things using local supply chains, upskilling young people and delivering better outcomes.

Meghan Gallacher: I will try to put my last three questions together, because they are on the same issue. This morning, we have spoken a lot about out-of-date local development plans and the length of time that it takes to draft and adopt new ones. It would be good if someone wanted to expand on those points and on what we can do to accelerate the process.

We have also heard about the overly rigid interpretation of NPF4. There are policies, whether they are contained within NPF4 or sit outside it, that stifle development. One example of that could be the application of 20-minute neighbourhood policies to remote rural developments.

Does anyone want to expand on those points? The future of LDPs and where we go with them is an important point.

Dr Brown: I will say what you would expect me to say about LDPs, which is that there is a resourcing issue—we know that. I am sure that Pamela Clifford will come in on this, because HOPS has been doing some work on LDP teams. It is concerning to hear that many authorities have only tiny groups of people—two or three officers—who are responsible for bringing the LDP to fruition. Clearly, that is part of the problem—it is a resourcing problem.

The housing emergency has meant that there has been a lot of focus on housing and housing delivery. A lot of attention and resource has been pushed in that direction, possibly to the detriment of other things. Planners are in demand in many places, not least in the energy sector. That has affected the ability of local authorities to keep hold of planning teams, maintain numbers and bring their LDPs forward.

On the processes around LDPs, I am a great fan of the word “evidence”—Ariane Burgess's first question was about evidence. There is definitely scope for some work on what is happening with the processes for LDPs. Are the new LDPs happening in the way that was envisaged? There have been some suggestions that local authorities are trying to rewrite all the NPF4 policies. One

planner said to me, “My colleague thinks they have to rewrite everything, and I am telling them no.” Some of those issues are potentially part of the reason why things take time and slip.

I will give Pamela Clifford time, because I know that HOPS has been talking about this.

Pamela Clifford: It is important to get an up-to-date local development plan. I work with an up-to-date local development plan in my current authority. In my previous authority, on two occasions, we could not get an LDP through because of a controversial site. It just makes it easier if the LDP is up to date, as it allows much better and more robust decision making to take place. It makes it easier for developers as well.

As Caroline Brown said, some work has started on that, and I think that there is more work to be done. There is a lot of LDP slippage, because the teams for LDPs are often two or three people, and they have other duties regarding the local review body, tree preservation orders, stopping-up orders and core paths, as well as, sometimes, a regeneration aspect to their work.

Many authorities will struggle to meet the deadline of May 2028 for adopting LDPs, because a lot of the evidence reports have not gone through the gate checks. Authorities have lost time there, never mind there being issues with regard to resourcing in taking things forward. There has been a lot of concentration on, and a lot of resource spent on, looking at development management and local development plans. The key point is that we work under a plan-led system, and we need to resource those teams.

I agree with what Caroline Brown said. There is some work to be done, probably through HOPs, the RTPi and the Scottish Government, on what we want the new LDPs to look like. We have policy at a national level, and we should not be duplicating that work at a local level; we should only deviate from it to meet local needs.

We should consider how to produce a more digital local development plan. We do not need big documents, given the strong policy focus from NPF4. Can we have slimmer, more engaging documents? Our communities do not want big documents; they want to go online and see the development proposals and the thinking on how they are to be taken forward—as do developers.

There is a lot of work to be done, looking towards 2028, to produce LDPs in the style and format that we all want.

The Convener: I will bring in Clare Symonds but, before I do, I need to say that we must all become a bit more succinct, as we are about halfway through our questions but more than halfway through our time. The evidence has all

been very important, which is why I have allowed that to happen, but I give everyone notice that we might roll past 11 o'clock.

Clare Symonds: Development plans are 10-year plans now, and my feeling is that they should not be hurried. They need to be right, and the processes of deciding what is allocated where need to be overseen by communities. When the bill that became the Planning (Scotland) Act 2019 was being considered, we advocated for an equal right of appeal, which we felt would help to ensure that the plan-led system was adhered to. However, we were told that we would have much more front loading, and that people would get much more involved in local development plans and would not need to have a right of appeal at the end of the process because they would have had control and influence over what goes into the plans.

There is a lot of work and focus on local place plans, but I am not really seeing resources or any interesting techniques. There could be citizens assemblies on which sites get allocated, for example, but they are not happening. I totally agree that there is not the resourcing for citizens assemblies. It is not that planners do not want to do them; they just do not have the time. Communication with community development workers and others is really important, and communities should absolutely have a stake in local development plans.

Alexander Stewart (Mid Scotland and Fife) (Con): It would be good to ascertain your attitude about the impact of the adoption of NPF4. There has been a plethora of associated working groups, guidance and advice. How has that affected the ability of communities to meaningfully engage with the planning system? Would you say that it has helped or hindered the development of local place plans?

Pamela Clifford: There is some work to be done regarding local place plans. The landscape is certainly rather cluttered in some authorities, and it is difficult for communities to understand it. There are LDPs, and there are often community action plans and local place plans. I see local place plans as critically important, and communities can influence them through their local development plans—in fact, yesterday, I had a conversation in which I pointed out to a community how important it is for them to put together a local place plan.

I reiterate that the local place plan does not need to be a long document. It can be a few pages, or it can be produced digitally, identifying the proposals and the sites that could be developed. There is a resourcing issue, however. The present focus is on LDPs and trying to meet or get near the target of May 2028. Communities

often just need some capacity building to enable them to develop their local place plans, and that is sometimes not happening in councils, due to resourcing issues.

10:45

Dr Brown: We see the power of local place plans. They have enormous potential. There are some wonderful examples of communities that have worked on fantastic, engaging, co-produced local place plans that give them a platform to do lots of things for themselves as well as help shape the agenda of others. For example, a community coalescing around a local place plan can persuade a local landowner to release land for development that has been allocated for a while and that they have been sitting on.

The plans can be enormously powerful, but we share the concerns about the complexity of the process, how the scope varies from place to place, the resource that is required, the unevenness of take-up and how the timelines work in conjunction with the local development plan. Not all communities will have an up-front local place plan before the LDP is put in place. There are lots of things to consider, but the plans give communities a concrete opportunity to engage in their place's future and give meaningful input. However, we have to recognise what will happen to it after that, because on-going support and resources are needed.

There is a lot of potential, and there are some fantastic examples of that, to counter Clare Symonds' point about engagement in planning. Glasgow City Council won our Scotland award for planning excellence last year due to its work around place efficiency assessment. It talked to 5,500 young people in the city—that was the start of a conversation with young people about what the city should look like, and the council wants to carry on the conversation as it produces its LDP. That is a really powerful example of what NPF4 and the Planning (Scotland) Act 2019 have changed.

Some really big things have happened, but we need them to be replicated. It is easier to do such work in a big authority than a small authority that has only two people in its local plan team.

Alexander Stewart: You touched on the local development plans, so I will ask my second question. The committee has heard concerns that several LDP evidence reports have been rejected at the gate check and returned to planning authorities for further work. We are ascertaining why that is happening and what needs to change to ensure that planning authorities are submitting evidence reports that meet the requirements.

You have touched on the fact that some larger authorities have a large team of people working on the issue and smaller ones have only a small number of people doing so, but something must be fundamentally wrong, because even the larger ones are having their reports returned because there is a mismatch at the point of the gate check. It would be good to get a flavour of what you think of that.

Pamela Clifford: We are all working with the new system, and some of the reports that were returned were not actually based around themes. The reports with themes seemed to get through the gate check, while the reports with a more place-based approach were returned. We are all learning from what has gone before, so I hope that, as authorities are more able to determine what is required and what the reporter is looking for at that stage, fewer will be rejected.

The Scottish Government, HOPs and the RTPi have done some work around that, because it is difficult for some of the authorities that assumed that the plan would get through the gate check. When the report is returned, big authorities can deal with what needs to be done, but it can be difficult for small authorities to do the necessary work, given the tight timeline.

Dr Brown: There is learning to be done on both sides—the reporter side and the local authority side—to interpret the expectations and what “good” looks like in practice. The slippage has been frustrating and tricky for those local plan teams, but we all have to press forward. We can only go forward from where we are.

Willie Coffey (Kilmarnock and Irvine Valley) (SNP): Good morning. Thanks for all your question responses so far. I want to ask a broad question about planning resources, which we have touched on a wee bit. Do you see planning resources as having increased since NPF4 arrived, or is the position pretty much as it was before?

You will be delighted to know that there has been some discussion about ring fencing planning fees for planning departments and so on—no sooner had we got rid of ring fencing than it came back again like the tide. What are your views on planning resources, whether they have improved and whether they should be ring fenced?

Pamela Clifford: The planning fees increase has certainly been welcomed, but the situation is often determined by the number of applications that are coming in the door, and income has largely been quite steady, even though the planning fees have increased.

I do not need to tell you about the financial resourcing issues that local government is facing. Each service is expected to make savings each

year, so the situation is getting more and more difficult. As we have talked about, authorities are often putting a lot of resource into the development management side because that is where the pressure is, but it means that they have very light local development plan teams. You talked about the conditions, but some authorities have taken away their enforcement officers, so conditions are not being enforced and monitored. What is the point in putting in conditions if you will not monitor and enforce them?

HOPS has always advocated for the ring fencing of planning fees, which would certainly strengthen the planning system. It would mean that planning fees are coming in, although the fees in Scotland are well below the fees in England and Wales, so they still would not meet full cost recovery.

Dr Brown: The planning fees increase has been welcome and the indexation means that we will have an annual uplift, which is helpful. Our public sector members who are trying to get planning consents say that they are happy to pay a higher fee if they get a better service, and they see ring fencing as a way to help protect the budget and get the funding reinvested.

However, development management planning applications are only one part of the system, so the RTPI also wants to talk about resourcing the other bits of the system. We have already talked about LDP slippage and the LDP team sizes but there are also issues about the resourcing of parts of the system that are not in local authorities, such as some of the key agencies and bodies that are statutory consultees, because not being able to get their responses to planning applications is also slowing things down.

What has already happened is welcome, but there is still an issue around resourcing in multiple parts of the system, so we need to be cautious about the idea that ring fencing will solve everything. It could be helpful in some places, such as development management, but it does not fund everything, so there is a question about the resources in the other parts of the planning system.

Another point about planning resources is that, although the Government has made welcome commitments to bursaries and its future planners scheme, we need to have really nice jobs for those people to go into. Local authorities need to be able to recruit planners and to create posts for them to come into so that they can help to deliver all the things that we need them to deliver.

Clare Symonds: When I saw the programme for government, I was concerned about the mention that is made of the Government's intention to undertake

"rapid audits of planning teams in each of the key agencies".

I am not sure what that means. Does it mean that there is going to be a bit of a bonfire of the quangos, as has been happening down south? I hope not.

I reiterate what Caroline Brown and Pam Clifford said about the need to resource other parts of the system, which include the agencies and the ecology services. When we have looked at major planning applications that have been made, we have not noticed the involvement of any ecologists. It is very worrying that ecologists have sometimes not been involved even in big, complex applications, because it suggests that planning authorities might not have the necessary resources to bring them in.

I think that there has been recruitment to the planning and environmental appeals division of the Scottish Government, but if we want to encourage people into planning, we have to stop having a focus on speeding things up. We need to talk about recruiting planners to make quality places; we should not see them simply as bots to approve planning permissions.

Neil Sutherland: In relation to what Clare Symonds has just said, my concern is that, instead of doing planning, planners are doing lots of other things. When I started, 30-odd years ago, it was normal to meet planners regularly to discuss what it was that you were trying to achieve before the development proposal was completed. It is now very difficult to do that.

I count a number of planners in the Highlands as friends, and I have run an organisation with 50 people in it. The question is how you motivate people to do good work and to work efficiently and ensure that there is high morale and so on. Obviously, leadership is important, but an issue that we see time and time again is the never-ending cycle of single-issue representations. I am not talking about major developments; I am talking about relatively small developments of, say, 10 houses in a small settlement somewhere in the Highlands. We get one objection after the next. The single issue might be flood risk, roads or trees. Although those are important issues, representations on them keep coming in time and time again, which holds applications up for months and months. The community, on the other hand, has one opportunity for representations, which is time limited. It cannot be motivating for planners to continually have to deal with that never-ending round of consultations. Needless to say, as a result, everyone—the community and all the other parties—gets frustrated.

I come back to where I started: we need planners to do planning. I think that planners need

to have more control over the process and to be able to say, "Right, we've given everyone an opportunity. Now we have to make a decision and move things on." The process is simply taking too long, given all the pressures that communities face. Those are my thoughts.

Willie Coffey: Thank you. I will ask my next two questions together, if that is okay. Do you welcome the Government's planning hub and the national planning improvement champion? Do you think that they will make a contribution in progressing NPF4 locally?

11:00

Pamela Clifford: I will say two things. First, the planning hub is certainly welcome. It is at an early stage. HOPS has been working with the Scottish Government and the RTPI to try to shape the planning hub. It is there to assist local authorities, and that must be at the forefront of its work. It is about having rich discussions about what local authorities need. In the past few weeks, we have had some good discussions on recruitment, the sharing of skills and local development plan slippage. The planning hub can provide critical assistance.

Secondly, we are just about there with phase 1 of the national planning improvement champion, and we are looking towards phase 2. It has been a good exercise to go through the process and develop improvement action plans. The critical thing will be how planning authorities take forward those plans and ensure that they are monitored and evaluated. We will all learn from the improvement action plans that are coming forward.

I will just get this in here. The HOPS conference is on Thursday in Kilmarnock, and we will have a session on Friday with the chief planning officers and the national planning improvement champion. The chief planner, Fiona Simpson, will be there, as will Andy Kinnaird, and we will have a good discussion about how we will take forward phases 2 and 3 of the national planning improvement framework.

Dr Brown: In my previous answer, I was going to touch on the national planning improvement champion and the work that has gone on over the past 12 months or so on the improvement plans. The next stage, which is critical, is to analyse the position across all the authorities and draw out the general lessons. There may be things to feed back into the planning hub, for example. Some of the issues may sit outside the local authorities and will be things that the Scottish Government can help with—it will not necessarily be a case of every authority trying to solve all the problems on its own.

The planning hub creates a space for additional resource to be drawn down, whether that is expertise, guidance, knowledge or assistance. It is also about filling a gap when a post is vacant—can the planning hub help to provide support in the interim? As Pamela Clifford has mentioned, there have been quite a few conversations to try to shape the planning hub so that it provides the type of resource that will assist authorities to make a difference, which is really important. There was a danger that the planning hub could become something that does not actually deliver anything. The stakeholders have been trying to shape it so that it helps on the ground—that is what the conversations have been about.

I mentioned the idea that the planning hub could convene people around particular policies to provide a safe space for authorities to ask questions and have conversations with one another about interpreting specific policies. We did not really answer your question about that, but there is definitely a role for the planning hub in doing that sort of work to help with delivery on the ground and consistency across authorities. The planning hub has a lot of potential.

We value the work of the national planning improvement champion and we are keen to see that taken forward in a meaningful way. However, we need the cross-cutting analysis to help us to do that.

Willie Coffey: Thanks, Caroline. Is there anyone online who wants to come in?

The Convener: No one has indicated that they want to come in.

Willie Coffey: In that case, I thank everyone for their answers.

Emma Roddick (Highlands and Islands) (SNP): Good morning. I want to look again at workforce resourcing issues. The Royal Incorporation of Architects in Scotland has called for a significant roll-out of masterplan consent areas across Scotland to reduce some of the administrative burdens and in the hope that that would speed up decision making. Do you support that suggestion? Would it indeed speed up decision making?

Dr Brown: Masterplan consent areas have their place, but they are not suitable in all places. They require resource up front and put quite a lot of burden on the authorities that engage with them. We know that, while some authorities are very keen on taking forward MCAs, others are reserving their judgment.

Again, I come back to capacity and resources. Supporting a masterplan consent area, or trying to support multiple such areas, will not necessarily be easy or quick. MCAs have a place and a role to

play, but they are not suitable in all circumstances, and they are by no means a silver bullet. Although we sympathise with the RIAS perspective, we do not see MCAs as an across-the-board solution.

Pamela Clifford: I agree with Caroline Brown. In certain circumstances, they may be a good solution, but they require a lot of resourcing up front. Will they result in quicker development on the ground? I think that the jury is out on that.

I am a great supporter of masterplans, but that approach is not suitable for every site or development, nor for every council. You may be talking about taking forward a masterplan for quite a large site, but that should not prevent you from getting planning permission in principle.

A lot of applications come in as masterplan consent areas, but behind that is the fact that, although delivery is much quicker on the ground, a lot of time is spent at the stage of taking a development forward.

I do not know, therefore, whether such an approach would save time in the long run. Having rich pre-application discussions may be a better solution, so that all the issues are addressed beforehand and there is then a fair wind once the application comes in.

I know that we are at a very early stage with masterplan consent areas, and there are now fees associated with the process. I am not really aware of any great demand among developers to take forward MCAs; most want to go through the traditional route.

The Convener: Both Clare Symonds and Neil Sutherland would like to come in online. Neil, it looks like you are up on screen.

Neil Sutherland: Thank you for the question. We have been involved for a number of years in masterplan work, and there is a great opportunity within that to bring communities into the discussion. I am, personally, strongly in favour of masterplans; they are a great opportunity for collaboration at all levels, including with strategic planners. We adopted that approach with Moray Council; it led to a relatively modest development of around 20 houses, but it made a big difference. The process was time consuming, but the landowner was keen to deliver a quality development, so we used the MCA mechanism. We have used it in rural areas, too. It allows people to voice their opinions and gets them involved in planning, so I think that it is a great thing, and I strongly suggest it as another opportunity that we should be using.

Clare Symonds: As the committee might remember, MCAs were initially called simplified planning zones, and they were then rebadged as masterplan consent areas. I would quite like to

rebadge them again as better planning zones or community collaborative planning zones.

As Neil Sutherland indicated, there is potential for collaboration on MCAs. The process is a good example of public-led planning that is about building community wealth rather than buying land to build community assets through land reform. MCAs could be a powerful tool for community engagement and even in enabling the community itself to become a developer.

Emma Roddick: I note that the RTPI has asked that NPF4 be made a dynamic document that is continually updated to reference any new advice as it is published. How might that work in practice, particularly given that any amendments to it are subject to parliamentary approval?

Dr Brown: I should take that question, as I am from the RTPI. We are not suggesting that amendments do not go through a process; it is more about the presentation of NPF4 in the light of the continuous issuing of guidance. We recently had a chief planner letter on policy 22, and we had the guidance on climate resilience last week. However, when we look at the text of NPF4, we see that those new bits of guidance, and clarifications in the form of letters and supporting documents, are not linked to the policies. We were arguing for them to be linked so that things are not missed—for example, a chief planner letter that may clarify the interpretation of a particular policy.

Pamela Clifford talked earlier about having digital LDPs. We would love to see that with NPF4. Rather than having a static PDF document on a web platform, a dynamic document would allow links to be made to other policy areas, both inside and outside planning. NPF4 is helping to deliver many of the Scottish Government's other ambitions, and it is important to link to new documents when they emerge, whether they relate to housing, transport, nature networks or something else.

That is what we meant; we are still arguing for that, and we think that it would be a really great evolution of NPF4 and its implementation. It would help everyone to have all that information in one place and up to date.

Pamela Clifford: I certainly support that, as someone who works on the ground. As more guidance and chief planner letters come forward, the landscape becomes cluttered, so I certainly support what the RTPI is proposing.

The Convener: I can see it now: a wonderful website with clickable things that pop up and where everything is connected. That is a great suggestion.

Fulton MacGregor now joins us online with a couple of questions.

Fulton MacGregor (Coatbridge and Chryston) (SNP): Good morning. Do the witnesses believe that NPF4 supports a gender-sensitive approach? If not, how might more be done to improve that?

As I am not in the room, convener, I am happy for you to go through whoever wants to come in.

The Convener: Does anybody want to take that? Pamela Clifford will start.

Pamela Clifford: Such an approach is not mentioned specifically, so it is probably more about the interpretation of how we take forward placemaking. Again, it is something that could be linked to the placemaking policy; some good work is being done on that in Glasgow and Edinburgh, and it could be rolled out to the other planning authorities. There is probably also a role for the planning hub in providing guidance, capacity building and training, in taking that forward.

As planners, we should always be sensitive to that aspect when we discuss development proposals and as the new LDPs come forward.

The Convener: Great. If no one else has anything new and different to add, I will move on—

Dr Brown: I have just one point to make, convener. I do not think that NPF4 is standing in the way of that approach. There is a strong emphasis in NPF4 on inclusion and equalities, and I think that that is enough to provide a platform for authorities and for anyone else who wants to take forward gender-sensitive work specifically.

The Convener: Fulton, do you want to ask your final question?

Fulton MacGregor: My final question might give the witnesses an opportunity to sum up. How can the committee focus future NPF4 scrutiny to ensure that it targets areas of concern to communities and stakeholders? I will go to Clare Symonds first because she and I did a bit of joint work with an organisation in my constituency—the northern corridor community forum—whose views and thoughts are not often taken into account. The question is therefore particularly important to me. What can the committee do to make sure that communities feel that they are heard in the NPF4 process?

11:15

Clare Symonds: Thank you—it is nice to see you, Fulton. Rather than asking us that question, it is about focusing on the monitoring of outcomes. Let us have some proper resources. Maybe we could bring in some of the universities to look at the evidence base for how well NPF4 is delivering in that regard.

As you rightly say, communities are still being left out in the cold on planning. There is a wider set of things that the planning system as a whole needs to deliver, and that includes giving communities much more power. We are still asking for an equal right of appeal because we think that that would change the weighting and the balance of power in the planning system. That is desperately needed because communities do not have the voice that they should have.

The Convener: Does anybody else want to give us—or the next committee that takes on our role—a little guidance on our future sessions on NPF4?

Pamela Clifford: I agree with Clare Symonds about the monitoring of outcomes. That is critical in showing how the policies are being implemented and what they are delivering. We started off talking about biodiversity; to go the full circle, we need to see what is being delivered on biodiversity and climate resilience.

We talked about housing and the monitoring and evaluation of whether we are delivering the housing numbers, but the quality of housing is equally important. We also talked about communities, and I agree that communities have a big part to play in NPF4 and getting involved in the planning system and local development plans.

It is frustrating for planners that we do not often see communities getting that involved. When we go out, we get four or five people turning up or replying to an online survey. As planners, we are trying to adapt, whether it be by going to a local fair or to different groups to involve communities. We need to change the image of planning so that communities feel that they can get involved. The local place plans and the narrative around those will be critical in getting our communities involved so that they realise that they have the power to influence local development plans and shape their communities.

Dr Brown: I agree with Pamela Clifford. It is useful to have an annual review, but there is a question about what happens to it. You make recommendations, but what is the response? What is the update from the Scottish Government? What happens in the interim?

There must be reporting against outcomes and it must be evidence based. We have talked about evidence a number of times. Having evidence is really important so that these sessions are not just a matter of putting a finger in the wind to find out what people think or feel about something; there needs to be data or figures to look at. There are things in the system that you can quantify and there are things that are harder to quantify, but we need to look at what the evidence base is. That is really important, because we want NPF4 to work and we want it to be up to date. At some stage,

there will be a question about the point at which NPF4 should be reviewed and whether or when it should be amended. The evidence base will be important in that regard, and this scrutiny plays a role in helping to inform the decision about what happens with NPF4.

The Convener: I want to dig into that a bit. You said that there are things that we can quantify. Will you give us a couple of examples?

Dr Brown: Clearly, we have data on housing numbers. We also have measures on biodiversity, so what is the planning system delivering on that? Can we quantify that? We have new tools to help local authorities measure 20-minute neighbourhoods, so, again, what evidence do we have and is being built up about how NPF4 is working on the ground? Those are just some things off the top of my head.

The Convener: Does anybody online want to give us a bit of direction on that, too?

Neil Sutherland: The way to change perceptions is the same as in private business: one has to promote oneself. Very often, you need communications and public relations help with that. NPF4 is a fantastic story; it reshapes national and Government priorities. When you read the document, it is very encouraging and positive.

The other folk online and in the room for this meeting have specialist, immediate experience of things. We tend to come out with our frustrations and say how we could improve things, but, overall, we are living in exciting times, and there are all kinds of opportunities that must flow from NPF4.

Planning is incredibly important, and I share planners' frustration about the fact that people are not more excited about planning, but the only way to achieve that is to make it exciting—to reach out in a way that engages them. That could happen, and there are definitely some good stories to tell. However, in the same way that I am not an expert on communicating that and would reach out to get someone's help with doing so, the planning fraternity needs to get advice on how best to communicate the successes and the dynamism in planning. That is just what occurs to me off the top of my head.

The Convener: That makes me think about the really great work that took place in Dumfries with the Stove Network, which is an arts network that was employed to engage the community on what it wanted for the future of Dumfries town centre. It gave rise to the Midsteeple Quarter, which is one of my favourite community-led mixed-use projects. Perhaps planners and the arts and culture sector could get together and find ways to interpret things.

Neil Sutherland, I loved that you said that NPF4 is a great read and has a great story to tell, but, for some people, it is not written in the language that they use, so we need to think about how we can make it accessible to them. The Stove Network was right there, in front of people, using engaging processes and artistic experiments to get people thinking about their community.

Clare Symonds, I think that you have already spoken on this topic, but do you want to say anything else?

Clare Symonds: I come back to the point about having equal rights of appeal. Our envisaging of that process is not that it would hold up planning and so on but that it would address situations in which a community that has been engaged in the local development plan or has spent ages doing its local place plan—there is no suggestion that that will influence the local development plan—and a planning decision goes against that plan. Currently, it has no way to challenge that. There is no way to say, “Hang on—that decision was made badly,” or, “That decision was misdirected.” There is no way for a community to come back on the decision.

We hear time and time again that people cannot believe that they do not have a right of appeal. It is grossly unjust that one sector has rights that another does not, and it is really important to people's perception of the planning system that they are seen as equal players, and a right of appeal would be proof that they are seen as equal players—that would be the epitome of that. That is why we are so keen to have it.

Willie Coffey: Pamela Clifford, on the impact that NPF4 has already had, particularly in relation to flood risk assessment, one of its unintended consequences is that, according to the Scottish Environment Protection Agency's flood risk assessment, we have perhaps suddenly rendered liable to increased flood risk housing settlements that were not previously assessed as being at risk of flooding. How do you see that situation? How can we manage the problem on behalf of residents who bought their house when it was not assessed as being at risk of flooding only to find that it suddenly now is?

Pamela Clifford: That—specifically policy 22—is one of my favourite topics in NPF4 because of the impact that it is having on communities. You will be aware of the situation in Kilmarnock, but that is happening throughout Scotland.

On the impact on development proposals, as we have discussed, NPF4 very much pushes brownfield sites for development, and rightly so. However, brownfield sites are often on flood plains, which is a really difficult situation. Policy 22 is quite robust, and SEPA is really robust on that

policy. There was a short-life working group on policy 22, but nothing fundamental has come out of it; it was more about addressing procedural issues.

Maybe we need to review the policy, because it is certainly impacting on housing development. It is one of the barriers to housing development, particularly on brownfield sites. My personal view is that the policy seems to be at the extreme end of the spectrum. I do not know whether there is scope to provide more robust guidance or to review the policy, but it is certainly seen as a barrier.

It is very difficult for a chief planning officer to go against SEPA. The chief planning officer's letter said that councils can go against SEPA on that policy, and my authority and other authorities have gone against SEPA, but that tends to be in relation to very small developments and not the bigger ones. I certainly do not want to see the policy act as a barrier to town centre regeneration and housing development in town centres.

There is some work to be done on the policy with the Scottish Government, SEPA and planning authorities. We all face the same issues in relation to that policy.

11:30

The Convener: Neil Sutherland, I have a question on 20-minute neighbourhood policies. Concern has been expressed that rigid interpretation of NPF4 policies is stifling development, particularly with the application of 20-minute neighbourhood policies to remote rural developments. I remember that, when 20-minute neighbourhoods were named in the first draft, the minister took on board the point that they would not be relevant to rural communities, so I am surprised that there are concerns in that regard. The language changed to "sustainable communities" or something like that, and it was not being said rigidly that rural communities had to be 20-minute neighbourhoods. Do you have any awareness of how that is filtering down to people on the ground?

Neil Sutherland: The historical context lies in European cities: that is where the idea came from originally—Paris in particular, I believe. It makes an awful lot of sense. I am not a planner—I am a businessperson and an architect—but my understanding is that the focus is on a range of resources within a given area, comprising physical community contact and other things.

In relation to rural contexts, using more local produce springs to mind. We have to define what we mean by the benefit of having a ring-fenced area and whether that relates to a given time, to a physical distance or whatever. Having lived in rural

areas for much of my life, I think that it would surprise a lot of urban people to know how incredibly well connected those in rural areas are in many respects. People know what other people are up to—but in a positive way. It is a self-defence, human kind of thing. I am surprised about the concept being applied to rural areas. We need a definition that can be applied equally, perhaps with different criteria.

As I have said recently, I would like to see a bit more ambition on what rural centres are. In the 18th and 19th centuries, Scotland had had an amazing planned villages and planned towns movement. Many of the places that we all love and enjoy now, including Bowmore, Thurso and Fochabers, are planned towns that did not exist 200 years ago. We need a similar ambition now. Historically, those places came into being as the result of significant economic change and opportunity.

We have a similar context now, in that we need regenerative opportunities and approaches, and we need to move away from global supply chains to much more local ones. What expression do we give to that? How do we build places, repair ecosystems and build opportunities for employment and economic activity for people, including visitors? How do we do that today? That is the question that NPF4 is there to guide. It is all in there; we just need to crack on and find a way to get stuff done more rapidly and more collaboratively. I would love to work more directly with planners again and get stuff done. I am sure that communities want to do that as well.

That is perhaps a nice place for me to end.

The Convener: Thanks for that. Yes, that is a nice challenge about how we re-envision Scotland to be more regenerative, with local supply chains, and how we build places and repair ecosystems using a collaborative approach.

That sounds good, so let us do it. If NPF4 provides the underpinning or framework for that, that is good news. We started with Caroline Brown talking about how planning takes time—and change will take time. It is good to get a sense check today on the piece of work that we have been doing. We are considering doing a focused piece of work on local place plans later in the year to unearth the good work that is being done by communities in that regard.

That concludes our questions. I thank our witnesses for joining us this morning and for their evidence.

11:35

Meeting suspended.

11:38

On resuming—

Subordinate Legislation

Valuation (Proposals Procedure) (Scotland) Regulations 2025 (SSI 2025/146)

The Convener: We have two negative Scottish statutory instruments to consider under item 3. The first is the Valuation (Proposals Procedure) (Scotland) Regulations 2025. As no member has any comments, is the committee agreed that we do not wish to make any recommendations in relation to the instrument?

Members *indicated agreement.*

Town and Country Planning (Fees for Appeals) (Scotland) Amendment Regulations 2025 (SSI 2025/166)

The Convener: The second SSI is the Town and Country Planning (Fees for Appeals) (Scotland) Amendment Regulations 2025. As no member has any comments, is the committee agreed that we do not wish to make any recommendations in relation to the instrument?

Members *indicated agreement.*

The Convener: As that was the last public item on the agenda for today, that concludes the public part of the meeting.

11:39

Meeting continued in private until 11:51.

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