

## Introduction:

The Highland Council welcomes the opportunity to contribute to the ongoing development of national planning policy, including commenting here on the Scottish Government thinking as set out in the NPF4 Position Statement. This response has built upon and therefore should be read alongside the Council's previous submissions to NPF4 and detailed national policy topic work including:

- [Overarching response to the Call for Ideas;](#)
- [Refined submissions on candidate National Developments;](#)
- [Detailed Policy Topics submissions;](#)
- [Response to the Housing Technical Paper consultation.](#)
- [Highland Indicative Regional Spatial Strategy](#)

We look forward to submitting our refined Highland Indicative Regional Spatial Strategy (IRSS) in April 2021 – within which, amongst other things, we are looking to further refine our candidate National Developments (cNDs). We feel that the region can and should make a significant contribution to the national outcomes sought by NPF4. It is important that we ensure that the priorities and role of Highland set out in the IRSS are fully understood and clearly represented. In addition, we look forward to pursuing this through forthcoming engagement on the development of the national spatial strategy for NPF4.

Throughout this response the Council has sought to highlight the importance and unique set of assets and resources that the Highlands contribute to the national setting and why we are promoting the region as a special case for investment and coordination. This special case encompasses the scale and diversity of Highland's unique environmental and physical characteristics, not least of our lengthy coastline, peatland resource and unique range and mix of urban-rural settings. It also seeks a fair and equitable investment strategy with focus and priority for rural areas, to ensure they do not get left behind as a result of urbanisation.

In developing the responses below, the Council has considered in detail, each of the potential policy changes outlined in the NPF4 Position Statement. Our detailed consideration has taken into account our previous submissions and sought to arrive at a view as to whether we are broadly in agreement - but in doing so, as requested we have not repeated our previous submissions on the understanding that Scottish Government is still considering those. This detailed policy analysis, cross-referred to within and forming part of our responses to Questions 1-4, is located within this response after Question 7.

As part of our response to question 5 we have outlined four additional policy topics ideas and the justification behind these suggestions, which we believe will assist in delivering the overall strategy behind NPF4.

Please note that this response has been prepared by Council Officers. The timing and timescales for consideration, combined with the consequences of the ongoing coronavirus pandemic and related restrictions, mean that this response is awaiting approval by our Members (by homologation). We intend that this will be done at the next meeting of our Economy and Infrastructure Committee, which is on 05 May 2021, after which we will inform Scottish Government of the outcome.

## **1. Do you agree with our current thinking on planning for net-zero emissions?**

***This response should be considered in conjunction with the Highland Council detailed policy analysis on the suggested NPF4 policies in relation to 'A Plan For Net-Zero Emissions' on pages 8 to 13 below.***

Highland Council fully embraces and supports climate change being an overarching guiding principle within NPF4, as this direction demonstrates a clear and genuine turning point to achieving a collective ambition in addressing climate change.

However, as part of the Development Plan, we feel that NPF4 will need to take a holistic and robust policy stance in order for the ambitions to be fully realised and to accelerate and deliver transformational change. The wording must be much clearer in order to deliver transformation. This means that on the whole policies should set out clear requirements and be directive as opposed to simply encouraging change (this goes for all policies within NPF4). This includes, but is not limited to, energy requirements, material selection and life cycle of new and existing buildings, changing travel modes and behaviour, and the policy and strategy for directing and prioritising future renewable energy generation and storage across the country. For 20 Minute (Neighbourhoods) Communities to be achievable across the whole of Scotland, significant consideration needs to be given to how we invest in services in rural areas, including improvements to the of digital connectivity network and its use.

Peatland restoration has a key role in the response to the climate and ecological emergency and as Highland has the largest peatland resource within Scotland. Consequently, policies aimed at its restoration should also factor in the significant benefits it will bring to our region and nation.

## **2. Do you agree with our current thinking on planning for resilient communities?**

***This response should be considered in conjunction with the Highland Council detailed policy analysis on the suggested NPF4 policies in relation to 'A Plan For Resilient Communities' on pages 13 to 19 below.***

The Council welcomes the overarching concept of people being given fair and equal access to goods and services and it is essential that the creation of resilient communities applies equally across the whole of Scotland, regardless of location. For the wider public to have confidence in the delivery of resilient communities, the Council seeks assurance that appropriate national investment is forthcoming, a requirement which we already outlined in our "local and resilient networks" cND developed and submitted as part of our IRSS. Moreover, the Council suggestion of a "local and resilient networks" cND demonstrates that Highland is already working to embrace the delivery of local jobs and services, whilst working to minimise the need for unsustainable travel through the expanded use of digital services and resilient public transport networks and reducing social exclusion. Furthermore, we would contend that this is Highland approach to delivering, supporting and addressing the 20minute Neighbourhood concept and Highland would advocate a re-badging of the concept as '20 minute communities' as it would better encapsulate the wider aim of building resilience into communities and to avoid any perception that it only applies to a urban setting. We would welcome opportunities to show, discuss and hear how this concept is applied equitably across all communities.

NPF4 must provide clear policies that ensure the availability and delivery of a range of types and tenures of housing, that will be applicable in both urban and rural settings, and the standards for and delivery of infrastructure provision, in a way that aligns directly with the 20 minute neighbourhood (communities) concept.

As we create our future communities, we also need to carefully consider the timing and potential implications of climate change and flood risk for our existing communities, particularly in relation to

rising sea level – and strategising and addressing this should be a national priority.

### **3. Do you agree with our current thinking on planning for a wellbeing economy?**

***This response below should be considered in conjunction with the Highland Council detailed policy analysis on the suggested NPF4 policies in relation to ‘A Plan For a Wellbeing Economy’ on pages 19 to 23 below.***

The Highland Council supports the movement towards the delivery of investment based on individual place based locational need, but contends that such an approach must transect all levels of government and governmental organisations – and that these are fully and properly costed through the Scottish Government Investment Plans. Doing so will ensure equality across regions and the full rural-urban spectrum, thus guaranteeing all communities receive their fair share of investment. The establishment of policies aimed at giving ‘certainty to investors’ and ‘explicit support’ for wellbeing and fair work developments, needs to be fully considered and justified to safeguard existing communities and advancement of the creation of resilient communities.

Given the geographical size, makeup and special character of the Highland region, policies around cultural assets, the growth of the creative and tourism industry, the marine environment and fossil fuel & mineral extraction will all have particular relevance to this area, as has the need for a strong reliable digital network. However, the very broad nature of all of these ideas and concepts currently prevents full and proper consideration and the Council would contend that careful balancing is required to ensure the environment, landscape and service provision are fully and adequately protected in each of the policies.

Tourism is an integral part of Highland life and Scotland as a whole, which led us to suggesting a cND (no.12) for the tourism industry as part of our iRSS submission. As such, we support the development of robust planning policies on this aspect, but would welcome policies aimed at expanding the tourism accommodation sector only being advanced following a comprehensive review, amalgamation and ‘levelling’ of the existing legislation, licensing requirements and taxation for all types of tourism accommodation (much of which is currently unregulated) – the ‘regime’ needs to be fit-for-purpose and, we believe, requires some modernisation.

The Council, also supports the principle of decarbonising the transport system through a modal shift away from motor vehicle road based travel as the preferred option. Nevertheless, it has to be recognised that outwith urban centres, road improvement schemes must still feature in the future to achieve efficient and economical driving styles and ease congestion currently experienced on some carriageways. Furthermore, the use of EV and H2 for HGVs, ferries and other shipping vessels should be promoted, alongside the better integration of the public transport network, park and ride opportunities and active travel infrastructure.

### **4. Do you agree with our current thinking on planning for better, greener places?**

***This response should be considered in conjunction with the Highland Council detailed policy analysis on the suggested NPF4 policies in relation to ‘A Plan For Better, Greener Places’ on pages 23 to 25 below.***

The embedding of strong placemaking at the heart of NPF4 to create and transition communities to be successful, sustainable and resilient is strongly supported and a view that aligns with the work THC is progressing throughout its iRSS. Highland unique size and make up results in the region having the largest blue-green resource across Scotland and the Council contends that NPF4 must acknowledge this resource and the contribution Highland makes, to maximise the economic value whilst concurrently safeguarding and enhancing it for the future and as such, all policies relating to it, must be fit for

purpose. The proposed use of the place standard tool as the key means of delivering this is questioned, as the tool has been developed to be a simple framework that considers physical elements against social aspects, whereas the ambition to transition to better, greener places especially with regard to delivering a positive effect on bio-diversity, peatland protection and woodland creation is not at the heart of this assessment tool.

The ambition to prioritise, reuse and repurpose Scotland's vacant land and built assets is also supported; achieving this however, will require closer collaboration with external funding providers, coupled with stronger and simplified land acquisition powers to ensure previously developed land and building reuse is favoured over developing virgin ground.

As also referenced in our response to 'A Plan For A Wellbeing Economy', the coastal environment is a key industry for Highland and the wider Highlands & Islands area in providing lifeline and key ferry routes. NPF4 policies around this should acknowledge this function alongside policies aimed at attracting larger scale industrial developments, cruise ship related development and pleasure boat expansion.

Peatland restoration has a key role in the response to the climate and ecological emergency and as Highland has the largest peatland resource within Scotland. Consequently, policies aimed at its restoration should also factor in the significant benefits it will bring to our region and nation. In addition, the creation and safeguarding of Scotland's woodland resource is strongly supported and aligns with the Council's current direction contained within the iRSS. Nevertheless, Scotland's woodland resource should also be considered as including a long-term sustainable 'productive' resource, in regards to the material selection and life cycle of new and existing buildings as outlined in our 'A Plan for Net-Zero Emission' response above.

### 5. Do you have further suggestions on how we can deliver our strategy?

This response has primarily focused on assessing the NPF4 Position Statement against our previously submitted policy topics and the suggested potential policy changes. Therefore, at this juncture the Council has not fully considered the candidate National Developments (cNDs) submitted to the Scottish Government by other parties, which are or could be relevant to Highland. Instead as we work to refine and focus the candidate National Developments (cNDs) we suggested as part of our IRSS, we will also consider these other cNDs and provide feedback and comments in due course.

The following four policy ideas and their justification have been developed and are now suggested as the Council believe they are missing from the current list of suggested policy topics and are areas that will assist in delivering the overall strategy behind NPF4.

**Policy 1**  
**Long-term planned repurposing of existing built development within urban areas at high/confirmed risk of being affected by climate change. Followed by the greening of these areas to provide a 'natural flood' area which accommodates**

As Scotland experiences the effects of climate change on rising sea levels, it is likely that significant and considerable parts of existing urban areas will become more susceptible to inundation from floodwater and a number of existing flood defence schemes may no longer be deemed to offer adequate protection. There needs to be a strategy and policy to address this and it should be a national priority.

Broadly there are two options to offer protection to the areas most at risk. The first would be to develop bigger and better flood defences, which might include the comprehensive redesign and rebuilding of a number of existing schemes.



**water-based leisure and recreation, water based industry, hydro and marine energy, all to the benefit of the wider urban area.**

Moreover, increasing the protection to the areas most susceptible to inundation, could ultimately displace the flood water to other urban areas which are currently at a lesser risk of flooding; thereby requiring even greater flood defences to our urban areas.

In addition, providing such extensive flood defences requires a significant ongoing maintenance burden on local finances and a heavy social and wellbeing burden on the local population. Due to the risk of flood damage, upwardly mobile residents tend to relocate outwith these areas leaving the less socially mobile populations and therefore these areas risk becoming some of the poorer and most deprived areas within the urban makeup, which inadvertently require greater state investment to maintain ageing services and infrastructure and the built stock.

Therefore, a second option would be the long-term planned repurposing of the areas most at risk from climate change, by the relocation of the housing, public services and infrastructure and general private sector services outwith these areas. Which in turn would allow the redevelopment of these often poor hard landscaped urban environments into green open space within the heart of the urban setting. With it being the intention that these areas would then be able to accommodate flood water within the heart of the urban core, protecting the wider urban areas.

A strategy for a wider area could involve either option or a combination of both.

It is fully acknowledged that the second option comes with massive costs and could involve the displacement and disruption to a high number of businesses, residents, workers and/or users. However, these costs must be set against the cost of replacing and extending existing flood defences and the potential loss of life and therefore the political and the rebuilding costs experienced every time these defences fail to protect these areas.

It is anticipated that such a shift in policy would take several years to achieve. A 50 year timeframe is probably a realistic starting point, but small interventions and policy shifts could be realised in the immediate future: consideration could be given for example to limiting large scale public investment in public sector infrastructure in these areas (such as schools, affordable house building, road infrastructure) with investment redirected in line with delivery of the long-term strategy and adopting a more rigorous preventative planning process for private investment (even down to household restricting alterations and extensions).

It is acknowledged that such a policy in the short term, could risk these areas becoming deprived and rundown as housing, services and businesses relocate and the lack of investment begins to

	<p>become evident. Therefore a rigorous, well planned (masterplanned) approach would have to be taken, fully funded at both a national and local level and with cross party-political buy-in and a national taskforce could be set up to collate best practice.</p> <p>With regards to the repurposed areas, it is not suggested that these areas should just become wholesale open space, instead it is envisaged that these areas could have significant value in terms of providing land for flood resilient uses, such as water based leisure and recreation activities, water based industry and potentially hydro and marine energy generation/storage.</p> <p>We suggest that it is appropriate to establish this as a national priority and develop strategy and policy without further delay.</p>
<p><b><u>Policy 2</u></b> <b>Community developments/owned land</b></p>	<p>It has been suggested by a third party nationally that the Scottish Government adopts a National Development in relation to Community Development and Community owned land.</p> <p>Whilst the Council does not consider this to warrant being a National Development, after review, the Council does consider there is merit in there being a national policy approach to this issue.</p> <p>This assertion is based on the considerable recent growth of Community Interest Groups being established across the Council area, which have the statutory ability to acquire land both on the open market, but more importantly, Council owned land through the Community Asset Transfer provisions of the Community Empowerment (Scotland) Act 2015 and to do so below market value rates.</p> <p>Whilst the Council is generally supportive of these Community Interest Groups, there is concern regarding the long-term succession planning of these groups and their ability to deliver the 'community' service long-term that they initially envisage.</p> <p>This concern is further advanced by the general approach of the NPF4 Position Statement which seeks greater community involvement in the delivery of 'local' services.</p> <p>Given such emphasis, we consider it is important that a national planning policy approach is developed to allow full and proper consideration of the planning merits of each community project.</p>
<p><b><u>Policy 3</u></b> <b>EV Charging</b></p>	<p>The Council, with developer support is in the process of drafting non-statutory planning guidance on the technical requirements and provision levels for Electric Vehicle (EV) charging infrastructure within new residential developments.</p> <p>To achieve a national consistent approach, we contend that strong support at a national policy basis would help to continue to drive the</p>

	transition from fossil fuel vehicles to EV vehicles, thereby helping deliver on the net-zero agenda.
<p><b>Policy 4</b> <b>Light Pollution/Dark Skies</b></p>	<p>Scotland has some of the largest areas of dark sky in Europe, of which Highland administration area makes up a large proportion. With ever increasing light pollution from urban areas, it is important that Scotland protects this asset, as the increase in light pollution is now having an effect on wildlife whose life cycles depend on dark and human health by altering the biochemical rhythms. As such, a national policy would help to protect the existing un-polluted areas and reduce the existing light pollution elsewhere, whilst concurrently reducing energy consumption and thus electricity usage and delivering on the wider net-zero agenda.</p>
<p><b>6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?</b></p>	
<p>No Comments.</p>	
<p><b>7. Do you have any other comments on the content of the Position Statement?</b></p>	
<p>Highland Council considers it is imperative that all future NPF4 policies must be worded to ensure they are robust and clear in order to achieve the policy stated aims and to ensure they are workable for Development Management Officers. Therefore policies should include clear criteria and policy tests and should be developed based on the significant experience gained at a local level through local authority development planning and management experience.</p> <p>Furthermore NPF4 should have explicit clear aims and objectives and not seek to pass additional workload on to LAs/LDPs. It should therefore deal with matters nationally (national workstream) or, if tasking LAs/LDPs with the responsibility to undertake something (e.g an additional survey, audit or assessment), should help to specify the work required and should provide national resource to LAs to support that work.</p> <p>In addition, this response joins with the Council's submissions on various related workstreams and consultations being undertaken by the Scottish Government and it is vital that the development of NPF4 is fully joined up with the outcome of this work. This requires ongoing coordination and we feel that Scottish Government needs to not only do that but also to communicate the joined-up approach to all stakeholders; it is not always evident from the Position Statement whether and how that is being achieved.</p> <p>Finally, Highland Council has noted in various places that the NPF4 Position Statement has often blurred the distinction between planning policy and other legislation/control regimes (especially Building Standards and Investment control). As the Position Statement is developed into planning policies Highland Council would wish for the blurring to be avoided – and where a matter is better dealt with under a regime other than the planning system, then for Scottish Government to advance proposals for that other regime to pick up the matter.</p>	

## THE HIGHLAND COUNCIL RESPONSE TO NATIONAL PLANNING FRAMEWORK 4: POSITION STATEMENT (NOVEMBER 2020) - POLICY ANALYSIS

The table below represents the Highland Council detailed analysis of each potential policy changes within each theme outlined in the NPF4 Position Statement. It should be read alongside the above Highland Council NPF4 Position Statement Response.

SG Suggested Policy Change	THC Detailed Analysis
<b>A PLAN FOR NET-ZERO EMISSIONS</b>	
<p>Strengthening support for retaining and reusing existing buildings to maximise the use of the embodied energy. Consider how carbon assessments can ensure that the carbon stored in buildings is accounted for.</p>	<p>No specific reference in THC's earlier submissions to this as a potential policy but it is supported in principle. Policy should clearly demonstrate what is required/expected rather than be vague statements of support for retention/reuse. We welcome the strengthening of support for retention/reuse and carbon assessment requirements, particularly for non-designated historical buildings. Demolition of such buildings is not development (unless Listed or in a Conservation Area) and historic buildings have the highest embodied energy.</p> <p>Consideration should also be given to the following:</p> <ul style="list-style-type: none"> <li>• Ensuring that buildings are built to last, with their longevity a key consideration of design/materials;</li> <li>• Clarification whether this is a presumption against demolition – particularly where a carbon assessment may be able to demonstrate a net gain arising from replacement rather than reuse; a presumption against demolition would conflict with our Housing in the Countryside policy;</li> <li>• Provide clear support for retaining non-designated historic buildings;</li> <li>• Ensuring that buildings are fit for purpose e.g. retail units are high/large leading to wasted materials/energy in heating;</li> <li>• Clear guidance on carbon assessment requirements.</li> </ul>
<p>Making it more difficult for new developments that generate significant emissions, across the lifecycle of a development as a whole, to gain planning permission.</p>	<p>As above, there was no specific reference to this in THC's previous submissions but the principle is accepted.</p> <p>At present this policy idea is considered to be too vague to be meaningful and it is unclear how this is to be achieved, or what is meant by 'significant emissions'. Also there is some concern over potential conflicts with other key policy aims such as rural repopulation.</p> <p>Perhaps a more straightforward approach would be to require any developments which have any net carbon impact in the future to include a plan for how these emissions will be offset or sequestered through accredited schemes elsewhere in Scotland. Perhaps a 2tCO<sub>2</sub>e for every 1tCO<sub>2</sub>e emitted approach?</p>



<p>Supporting the use of materials with low embodied emissions, that can act as an emissions store and where the materials can be re-used with minimal re-processing at end of life of the building to avoid release of the embodied emissions.</p>	<p>Support can be given in principle, although it would be more effective to 'require' the use of such materials as much as possible rather than 'supporting'. Further clarification should be provided on the detail and practicalities of this policy, particularly:</p> <ul style="list-style-type: none"> <li>• Will there be some form of list or 'Bible' of embodied emissions/identifying suitable materials? Producing such a document will be a huge undertaking and will vary by region but it is hard to escape the conclusion that this will be required to provide a consistent approach across Scotland.</li> <li>• Building design should be fit for purpose and minimise wasted space/materials.</li> <li>• What weight should be given to low embodied energy vs lifespan of materials and/or their ability to be reused?</li> <li>• How much of a development will require to be undertaken with such materials?</li> <li>• What supporting information will be required?</li> <li>• Potential conflict with Building Standards over experimental low carbon materials or need for chemical treatments to make them safe for building use e.g. straw bales etc. The benefit of materials with low embodied emissions can be limited if the building design is not fit for purpose.</li> </ul>
<p>Embedding of the National Transport Strategy 2 Sustainable Travel and Investment Hierarchies into the appraisal and assessment of development proposals as well as the proposals themselves. This will also be achieved through an infrastructure-first approach to future development.</p>	<p>We support the outcomes and aims of the National Transport Strategy (NTS2). We feel that the NTS2 Delivery Plan has tangible reference points that should be incorporated into NPF4 to ensure policy that is measurable and achievable.</p> <p>It is disappointing that investing in existing infrastructure is seen to be a low priority. Furthermore, air travel to/from remote rural areas is seen as vital lifeline connections for business as well as providing more innovative ways to provide key services.</p> <p>The Council and its partners understand how people travel in Highland and we are working to address this, but SG strategies and policy approaches tend to focus and favour population centres with little to address the very different situation that rural communities across Scotland face. We need discussion on how these specific challenges could be addressed, more rural focused than urban.</p>
<p>Actively planning future development in a way that helps us to achieve zero carbon living that minimises the need to travel by unsustainable modes, for example by helping to create 20 minute neighbourhoods where achievable</p>	<p>Ties in with our suggestion for making a presumption against developments greater than 2km from services outlined in our original response to the Call for Ideas on the Policy Topics, such as places of work capable of accommodating the scale of development proposed, education, shops and other facilities for day to day living.</p> <p>See below for further detailed consideration of our approach to 20minute Neighbourhoods (Communities) and our cNDs on Local Resilient Networks and Regionally Important Facilities outlined within our IRSS submission.</p>
<p>Facilitating development that is</p>	<p>Energy efficiency of buildings is going to be fundamental and</p>

<p>highly energy efficient and which meets greenhouse gas emissions standards, including making provision for zero carbon energy generation.</p>	<p>needs to be highlighted. We would suggest that policy already encourages this aim but that simply encouraging is not going far enough. Clear and measurable policies would help.</p> <p>Consideration could be given to:</p> <ul style="list-style-type: none"> <li>• ‘Requiring’ development to be highly energy efficient rather than ‘facilitating’</li> <li>• Clear and measurable policies are needed for this to be achievable.</li> <li>• Building design should be fit for purpose and minimise wasted space/materials.</li> <li>• Promoting energy efficiency should not be at the expense of good planning.</li> <li>• Suggest this should be tied into Building Standards.</li> <li>• Any future development which does not achieve net zero emissions is simply creating a burden elsewhere in the system.</li> </ul>
<p>Setting out a consistent policy for meeting Section 3F of the Town and Country Planning (Scotland) Act 1997 in relation to emissions policies.</p>	<p>Although not specifically addressed in our response to date, we agree that a clear, consistent and measurable policy is required to set out how this is to be achieved. However, Building Standards may be more appropriate means of delivering this.</p>
<p>Clarifying where net-zero building approaches may allow development to proceed by offsetting emissions.</p>	<p>We agree with the principle, but greater detail is required on what mechanisms could be used to achieve this and the types of development to which offsetting could apply. It is unclear whether this could consist primarily of low carbon energy generation onsite or whether it would include carbon banking/offsite mitigation. This could perhaps be achieved through requiring investment in accredited sequestration schemes (e.g. Woodland Carbon Code).</p>
<p>Promoting nature-based solutions to climate change, including woodland creation and peatland protection and restoration.</p>	<p>Our CND14 outlined in our iRSS, promotes use of our natural resources for the delivery of carbon reduction through land management and the protection and restoration of our natural and bio-diversity assets, including our peatland areas and reforestation. It is also worth recognising that nature-based solutions can also contribute to the region’s ability to adapt to the changing climate.</p>
<p>Integrating development with natural infrastructure, including blue-green networks, to deliver multiple benefits including carbon sequestration, community resilience and health improvement</p>	<p>The Highland region has a large blue carbon resource. It has a wide variety of marine and coastal habitats known to sequester carbon. For example, saltmarshes, seagrass beds, maerl beds, and biogenic reefs.</p> <p>It is understood that the majority of these habitats cannot be used in carbon emissions inventories yet. It would however be useful to have guidance from government and nature conservation bodies of the likely scale of this resource. Where possible NPF4 and the planning system could facilitate protection and restoration of blue carbon in the same way it does for other carbon rich habitats such as peatlands.</p> <p>We already take account of our green networks through integrating into sites as part of our site assessments when</p>

	<p>preparing Local Development Plans, as well as the position we are promoting in the review of the Inner Moray Firth LDP. There are sections on 'Maximising the potential of our green and blue infrastructure' and 'Biodiversity Enhancement', the latter proposes introducing a developer contribution requirement to address the overall net loss which development often makes.</p> <p>However, efforts to integrate blue/green infrastructure and high quality open space within developments can easily be hampered if other public bodies take a more rigid view of such resources.</p> <p>Highland Council also strongly supports the principle of SUDS schemes as part of integrating blue-green infrastructure. However, often the implementation of SUDS systems has been poor, with issues around adoption, a lack of knowledge of who is responsible leading to a lack of maintenance. These issues should be considered and addressed as part of this policy development.</p>
<p>Strengthening our support for re-powering and expanding existing wind farms.</p>	<p>It is not clear whether a genuine strengthening of support is intended (a change in policy), or simply words of encouragement. Existing national policy (2014) already provided some support. Would NPF4 go a step further, by suggesting for example that proposals for re-powering or expansion should be supported even if the proposals would result in more significant impacts than arose from the existing schemes, including perhaps where mitigation secured on original schemes would be un-done? The trend of wind energy proposals is to much larger scales of turbine, sometimes triple the size of those on early schemes. Further through the Position Statement however it clarifies that they need to be "appropriately sited" and subject to detailed consideration. Overall we agree that re-powering and expanding wind farms can be supported in principle – but this is subject to detailed consideration of proposals and where they can be accommodated and/or additional impacts can be suitably mitigated.</p> <p>Also, it may be noted that we are currently being faced with proposals to extend the lifetime of consents (without necessarily being presented with proposals to replace the turbines) – The Highland Council is treating these as a form of 'repowering'.</p> <p>Whilst there are issues around the clarity of this proposed policy change, it is highly likely that the support and expansion of wind energy generation in Highland will be an essential component of our net zero journey, not just in respect of continued decarbonisation of grid electricity but in the need for zero carbon electricity to produce green hydrogen. Onshore wind should however be clearly part of a mix of technologies – not seen as the only technology available to meet targets.</p> <p>Due to the enormous potential to generate renewable energy from natural assets within and around Highland coupled with world</p>

	<p>class skills and infrastructure, the area is being fast recognised as having the potential to be Scotland's first large scale centre of hydrogen production. The opportunities are wide reaching both in terms of economic development and for the decarbonisation of domestic energy usage (in industry, transport, heat and other fuels requirements) and for export. We need to ensure that NPF4 and the regional spatial strategy are aligned with these ambitions. They should acknowledge the proposed developments around the Cromarty Firth as a national development and the role which other parts of Highland can play in Scotland's transition to a green, circular economy.</p>
<p>Updating the current spatial framework for onshore wind to continue to protect National Parks and National Scenic Areas, whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site specific assessments.</p>	<p>It is not clear what real difference such 'updating' of the spatial framework would make to how proposals are assessed and determined in practice.</p> <p>Would the framework still identify the features/resources that are currently identified in Group 2? The current framework identifies Group 2 as Areas for Significant Protection but the real test relies on the site specific assessments with respect to effects and impacts upon the individual features/resources and of those, most are identified nationally, with only the 'community separation distance' identified locally.</p> <p>A significant of time and resource is taken up in delivering wind energy, often taking many years prior to an application being submitted and then potentially years awaiting a decision, appeal, PLI. This lengthy process is often dominated by landscape and visual impact considerations which can be very emotive and subjective, and balancing this with the policies and political desire to support renewable energy and investment.</p> <p>We gained the impression from earlier stages of NPF4 work that there was a suggestion that we could/should be according greater protection to local landscape designations and that this might be picked up within the spatial framework. Where will that square with what the Position Statement has said? Also, how does this fit with Landscape Sensitivity Appraisals and similar previous landscape work undertaken by planning authorities across Scotland, which we understand we are encouraged to refresh in line with NatureScot's emerging revised guidance for such assessments? Furthermore, where is the 'national landscape conservation' that we thought would need to happen at this critical time, when policy across multiple topics and sectors needs to be coordinated in order to deliver transformational change to address the climate and ecological emergency and to deliver a green economic recovery?</p>
<p>Introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen.</p>	<p>Our submission focused more on maximizing our existing infrastructure and assets, particularly the National Grid, as well as the creation of Local Resilient Networks for renewable energy generation and consumption. While we support the development of a wide range of renewable energy technologies, an efficient</p>



	<p>means of transmitting and distributing the energy generated through modernization of the Grid and the development of Smart Grids is essential. Where the National Grid cannot be improved to take renewable energy capacity within Highland, policy should be focused on support for renewable technology to create hydrogen, which could then be used to decarbonise transport, as well as Smart Grids.</p> <p>There may be potential for onshore wind farms and hydro generation to be used as renewable energy sources for the microgeneration of hydrogen. If hydrogen were to be pursued for heating of buildings and industrial processes then, given that some areas are not on mains gas, it could be more viable to have more local/regional hydrogen generation plants.</p> <p>It is also suggested that a more holistic joined-up approach to the whole energy sector (including funding) is required at a national level in terms of the generation, transmission, distribution, and consumption of energy rather than the creation of a number of separate policies around the subject – or that if there are individual policies then they are part of a joined up approach.</p>
<p>Setting out a more practical and outcome focused approach to accelerating a transition to renewable and zero emissions heating in buildings, including by linking with wider policies for green and blue infrastructure and vacant and derelict land and properties.</p>	<p>We agree that policies need to be clear, measurable and outcome focused in order to be effective, and that accelerating this transition is fundamental to combatting climate change.</p> <p>Consideration should be given to:</p> <ul style="list-style-type: none"> <li>• Linking to Building Standards, as that is likely to be the most effective means of ensuring this transition in terms of individual developments/buildings.</li> <li>• Stronger encouragement for use of open spaces (e.g. Park Power type schemes) and sources of heat such as the wastewater network would be welcomed.</li> <li>• It should be acknowledged that this approach may not be appropriate/possible with Listed Buildings and policy should caveat this.</li> </ul>
<p>In line with the Bank’s primary mission, the Scottish National Investment Bank has the opportunity to use its investments to be part of the drive towards a just transition to net zero emissions.</p>	<p>As the Scottish National Investment Bank is a SG construct it is seriously questioned if the creation of a planning policy around the distribution of its funds is required. Instead the requirements of obtaining funds from it, should be incorporated into its funding criteria entirely outside the planning system.</p>
<p><b>A PLAN FOR RESILIENT COMMUNITIES</b></p>	
<p>New Place Based Solution – 20minute neighbourhoods policy</p>	<p>20 minute Neighbourhoods are not specifically referenced in THC’s previous submissions, but the creation of ‘locally sustainable and resilient communities’ are, which in essence is looking to achieve the same outcome.</p> <p>Highland would however advocate a re-badging of the ‘20 minute neighbourhoods’ concept as ‘20 minute communities’. We feel that this better encapsulates the wider aim of building resilience</p>

	<p>into communities. It also avoids any perception that it only applies in an urban setting; '20 minute neighbourhood' might suggest something that just would not work in a rural context.</p> <p>We would suggest however that a strategy that supports opportunities to improve &amp; strengthen existing communities rather than creating new, inappropriate, ones (or inappropriate, overly large extensions of existing, small communities) is most likely to support delivery on this overall, especially in the context of constrained public and private resources.</p> <p>The Council considers that, through strengthening rural communities and their local networks, much can be achieved. The expansion, reinforcement and better use of digital connectivity is vital and can help support the delivery of services (especially remote areas) and the economy, although it is just one aspect. Our "local and resilient networks" cND in our IRSS shows how Highland is already working to embrace this approach for jobs and services, minimizing the need to travel and reducing social exclusion.</p> <p>A further point is that use of CPO could help deliver 20 minute neighbourhoods (communities) and infrastructure of various kinds to support the Place Based approach.</p>
<p>New overarching Principle Policy putting the needs of people, including their health and wellbeing first</p>	<p>The concept of this policy is about empowering the public in deciding how their communities develop and grow. However, at this stage no information has been provided outlining how this is planned to be achieved and resourced. For example, the Scottish Government's research on town centres published on 03 February 2021 highlights that Local Authorities need to be properly resourced to support this work and suggests that RTP1, A+DS and PAS may have a role in assisting Local Authorities.</p> <p>We would suggest however that a strategy that supports opportunities to improve &amp; strengthen existing communities rather than creating new, inappropriate, ones is most likely to support delivery on this overall, especially in the context of constrained public and private resources.</p>
<p>Policy on minimising &amp; mitigating environmental hazards &amp; pollution; including new policies on improving air quality</p>	<p>The SG is committed to improving the health of Scotland through the planning process and is proposing a suite of policy enhancement to achieve this. THC is in agreement with this ambition on the proviso that alignment is made with the Public Health Scotland priorities. THC also pushes for a policy on Marine waste/litter.</p> <p>NPF4 lacks detail on the specific problem of marine litter. THC provided a late submission on this subject at the call for ideas stage, and we have resubmitted this (below) as part of position statement feedback. To provide further context, THC has on a number of occasions been made aware of aquaculture litter washing up on beaches around our coast and we are considering</p>

ways to help mitigate this problem. One possible route is to put a waste management plan condition on all future aquaculture development permissions. Argyll and Bute Council has already been using a similar planning condition. Inclusion of an aquaculture marine litter policy (or even a wider coastal development marine litter policy) would align NPF4 with relevant National Marine Plan policies (GEN11 Marine Litter) and further legitimise a waste management plan condition.

**[Comments on Marine Litter:]**

Marine litter, particularly plastics, are increasingly being identified as a major source of pollution which can cause harm to marine wildlife through ingestion and entanglement. It also spoils the aesthetic value of the coastline and can be navigation hazard to marine users. The North Minches coastline (part of which is in the North West Highlands) is reported to have the highest concentration of beach litter in Scotland and the second highest in the whole of UK1. In the Highlands the source of marine litter is not yet well understood but fishing and marine industry debris is reported on the rise in the Moray Firth2. Although not quantified, aquaculture is also a known source of marine litter in Highlands region3. A recent white paper by the Aquaculture Stewardship Council4 has highlighted that extreme weather is currently one of the major causes of plastic emanating from fish farms and warns that climate change could exacerbate this problem.

The terrestrial planning system should have role to play in reducing marine litter. Not only does it regulate aquaculture developments, but landward developments can also contribute marine litter. Scotland’s National Marine Plan and The Pilot Pentland Firth and Orkney Waters Marine Spatial Plan both have polices that require developers to minimise waste and ensure responsible waste management. The PFOW Marine Plan also promotes recovery of marine litter should a pollution event occur as a result of storms. Scotland’s Marine Litter Strategy5 identifies that Regional Marine Plans should contribute to the reduction of marine litter.

Furthermore, monitoring of marine litter and reduction of litter sources is also required for Scotland to meet its obligations under the Marine Strategy Framework Directive6. With all this considered, and the fact there are currently very few Regional Marine Plans in operation in Scotland, the Highland Council would like to suggest of the inclusion of policies to promote the reduction of marine litter in NPF4.

**References**

1 Turrell WR. 2019. Spatial distribution of foreshore litter on the northwest European continental shelf. Marine Pollution Bulletin. 142: 583-594.

	<p>2 Turrell WR. 2019. Pilot Scottish Beach Litter Performance Indicators (SBLPI). Scottish Marine and Freshwater Science, 10 (4) (2019), 10.7489/12208-1</p> <p>3 <a href="https://www.scrapbook-scotland.org.uk/">https://www.scrapbook-scotland.org.uk/</a></p> <p>4 Huntington T. 2019. Marine Litter and Aquaculture Gear – White Paper. Report produced by Poseidon Aquatic Resources Management Ltd for the Aquaculture Stewardship Council. 20 pp plus appendices.</p> <p>5 <a href="https://www.gov.scot/publications/marine-litter-strategy-scotland/">https://www.gov.scot/publications/marine-litter-strategy-scotland/</a></p> <p>6 European Union’s Marine Strategy Framework Directive (2008/56/EC): Descriptor 10: Marine Litter, ensuring an interdisciplinary approach to conserving and protecting the marine realm</p>
New policy to support fairer, more inclusive and equality based approach	<p>This is a fairly wide-ranging policy topic which again at this time lacks specifics to the proposals. Generally, we agree with the concept but further details from Scottish Government are required to fully consider the proposal.</p> <p>We would suggest however that a strategy that supports opportunities to improve &amp; strengthen existing communities rather than creating new, inappropriate, ones is most likely to support delivery on this overall, especially in the context of constrained public and private resources.</p>
Policy on the creation of places that are healthier and more sustainable	<p>This policy is fundamentally about creating good quality mixed use developments and the delivery of the 20-minute neighbourhood (communities) concept, all of which are generally supported within the THC previous submission.</p>
Refocus Housing policy on quality and place, including focus on housing for the elderly and disabled	<p>This policy suggestion overlaps with the one above but goes slightly wider and includes the provision of high quality housing specifically for the elderly and the disabled.</p> <p>There is need for clear process and mechanisms for enabling delivery of housing for elderly and disabled. Forecasts indicate that Highland will be disproportionately affected and therefore we particularly feel the need for a clear approach and for this to be a national priority.</p> <p>We draw attention to the Main Issues Report for the review of the Inner Moray Firth LDP (currently on consultation) regarding affordable housing delivery (options for addressing barriers to delivery), self-build in urban areas and housing for ageing population.</p>
5year housing land target removed and replaced with a longer term perspective – monitor completion and release more need as necessary – informed by a Infrastructure First Approach.	<p>THC welcome the principle of a greater focus on the delivery of high quality and adaptable communities rather than housing numbers per se. We also support the Infrastructure First approach to housing delivery, but the changes to the 5yr land supply process seems premature before full consideration of the SG Housing Technical Paper consultation responses.</p> <p>The releasing of more land if necessary, informed by monitoring,</p>



	<p>suggests an approach similar to that which THC has previously employed: identifying 'long-term sites' in LDPs. It is understood that such an approach is not always favoured by some Council Services and external agencies, as it can be difficult to predict effects and pressures. However, we suggest that these concerns may be able to be overcome if very specific, measurable controls on what counts as a trigger to release the land, are agreed and put in place.</p>
<p>Stronger Policy on housing in TCs, remote rural, island communities, on vacant/derelict land and reuse of buildings - Infrastructure First approach to be part of site selection</p>	<p>The Council generally supports this ambition, albeit we need much greater assurance that 'Infrastructure First' will work as an approach across all communities and how it links to the longer term vision for Scotland.</p> <p>Also, we have some concerns remaining over the repopulation of the 'remote rural' aspect, as we believe there could be some conflicts with the carbon related policy ideas (including the protection of the blue-green resource and the protection and restoration of peatland and woodland) and the 20 minute neighbourhood (communities) concept. Instead this policy aspect in terms of 'remote rural' should focus on strengthening existing (rural) communities.</p> <p>The Council consideration of town centre living and the prioritising vacant and derelict land has been considered in detail in each of the specific potential policy ideas elsewhere in this response.</p>
<p>Self &amp; Custom build housing to be part of policy and potentially use MCA to allow these sites to be developed</p>	<p>THC's previous submission supports the Self &amp; Custom build housing aspect, although our submission did not cover this particular idea of utilising the Masterplan Consent Area (MCA) provisions of the Act to facilitate this.</p> <p>However, care needs to be taken over self-build and mechanisms set up to manage their success.</p>
<p>Updated policy on Gypsy/travelers, including new policy on 'showpeople'</p>	<p>The proposal to develop a consistent national approach is welcomed, providing it reflects local requirements.</p>
<p>Policy on what infrastructure is needed to support a development, including clearer requirements around Developer Contributions</p>	<p>The Infrastructure First approach is fully supported in THC submission, although our submission did not cover this particular idea of revising or the creation of a national policy around Developer Contributions.</p> <p>Local Authorities need greater assurance that all parts of Government will engage and work to deliver the Infrastructure First approach. This should be a truly collaborative and coordinated approach. It is important that the burden should not lay solely upon Local Authorities to pull all this together and to struggle with any filling of gaps. We need much greater assurance that Infrastructure First will work as an approach and will link to long term vision.</p>
<p>Policy on blue &amp; green infrastructure, including a focus on quality, functional, useable and</p>	<p>In our earlier submissions THC promoted an approach that NPF4 should recognise quality intergrated green-blue infrastructure as essential infrastructure for development and as such should be</p>

<p>accessible</p>	<p>factored into an “infrastructure first” approach.</p> <p>Also support for these spaces to be quality, functional, useable and accessible - and additionally inclusive and maintained. A caveat on maintenance is that the level and type of maintenance should be appropriate to the priorities and aims for the particular space e.g. not all green space ‘maintenance’ regimes would be best for biodiversity aims. Also, biodiversity opportunities should be considered as at least one of the aims for green infrastructure.</p>
<p>New Policy on Play, including formal and informal</p>	<p>Whilst this is an entirely new policy, THC strongly supports the requirements that play parks and equipment are of high quality and fit for purpose.</p> <p>Also, biodiversity opportunities could be considered in tandem with certain types of provision for play.</p>
<p>Updated policy on Flood Risk – focus on ‘natural flood management’ of both environmental water and drainage – including allowance for climate change &amp; restricting dev’t in flood risk areas</p>	<p>THC’s earlier submissions went beyond what the NPF4 Position Statement appears to be suggesting and sought net betterment from flood defences. Additionally, THC seeks clarification of the status of natural flood measures versus engineered solutions and would suggest they form only one of the options for flood schemes/works as natural flood management measures are more suited to some areas than others.</p> <p>We note that there is no specific reference to coastal erosion and feel that NPF4 must reference this – and the ‘Dynamic Coast’ project and tool for use to assist planning decisions.</p> <p>As we create our future communities, we need to carefully consider the timing and potential implications of climate change and flood risk for our existing communities, particularly in relation to rising sea level – and strategizing and addressing this should be a national priority. Is planned retreat necessary in certain areas and, if so, should we have a nationally-led strategy to begin this now and avoid any new development within certain areas, perhaps even down to avoiding further building extensions, etc.in order to minimise loss of embodied energy/carbon and investment that would be wasted in the long term? If areas that are known now to likely have no value in the future (due to flood risk etc) are opened up to development, is there a liability issue and if so then where does that lay?</p>
<p>Policy on reducing the need to travel unsustainably</p>	<p>THC supports the modal shift from motor vehicle to more sustainable means but notes that a range of solutions may be required to satisfy urban and rural locations and that any strategy should follow National Transport Strategy (NTS2) outcomes.</p> <p>Within rural communities, to deliver on the 20 minute neighbourhood (communities) concept, national support (including financial) must be absolute in the provision of a fully integrated public transport network, which utilises appropriately sized and modern vehicles (including hydrogen and EV), links to modern facilities and provides timely connections all at an affordable price</p>

	to the user.
<b>A PLAN FOR A WELLBEING ECONOMY</b>	
Policy on Place Based approach to control investment	<p>The Highland Council supports the movement towards the delivery of investment based on individual place based locational need; see our FW2040 project and similar work emerging for Skye and Raasay. The place based approach was previously grounded in investment and growth nationally but now it appears that the focus has been shifted to wellbeing.</p> <p>The easy part is to come up with a plan, the challenging part is getting it delivered, which then has a knock-on impact on certainty for investors and communities.</p> <p>In order for this approach to be successful it must transect all levels of government (and governmental organisations); and that investment is fully and properly costed through the SG Investment Plan to ensure equality across regions and that communities receive their fair share of investment.</p>
Explicit support for developments that support wellbeing economy and fair work	The establishment of policies aimed at giving 'certainty to investors' and 'explicit support' for wellbeing and fair work developments, needs to be fully considered and justified to safeguard existing communities and the advancement of the creation of resilient communities.
Policy on creating certainty for investors	The establishment of policies aimed at giving 'certainty to investors' and 'explicit support' for wellbeing and fair work developments, needs to be fully considered and justified to safeguard existing communities and the advancement of the creation of resilient communities.
Policy supporting new ways of working (home working, remote working and community hubs)	<p>The rollout of the digital network to more rural areas, coupled with the Scottish Government rural repopulation agenda and the effects of the COVID pandemic has resulted in new ways of working becoming more important.</p> <p>Any future policy should reinforce the resilient community agenda rather than purely the reliance on homeworking. Cross reference should be made with the creation of co-working spaces within town and village centres.</p> <p>Issues around health and wellbeing should also be addressed as part of this concept and a tie-in with the Building Standards should be considered in terms of creating safe, comfortable and appropriate homework areas.</p> <p>Consideration of the loss of the 'large' town centre office on existing town centres should also be considered, especially in terms of the loss of the service industry which these uses support.</p>
Policy to grow Scottish Aquaculture & revisiting interface between terrestrial and marine planning	<p>As the Highland region has a large blue carbon resource and extensive coastline any policy with regards to this aspect will have significant impact.</p> <p>In order to ensure a consistent approach is taken when mitigating</p>

	<p>environmental impacts of fin fish farms on wild salmonids we recommend inclusion of “adaptive management” in NPF4 policy. The Environmental Management Plan planning condition allows for monitoring and review of management measures and can respond to changes in industry practice and the environment.</p> <p>Any proposal to revisit the marine and terrestrial planning system, must reflect the importance LPA’s play in marine planning, particularly in assessing aquaculture development for planning permission. These developments tend to be very close to shore and can have a number of impacts on the environment and the local community which transcend the intertidal planning boundary. These therefore need to be assessed and have community representation.</p> <p>A potential planning policy aligning the Scotland’s Marine Plans, Sectoral plans for offshore wind and aquaculture, emerging regional marine plans, plans for our ports and harbours and the Blue Economy Action Plan would be generally welcomed subject to review and consultation on any potential wording and requirements.</p>
<p>Policy on tourist expansion, including infrastructure and safeguard environmental and community assets</p>	<p>Tourism is an integral part of Highland and Scotland (and one which in Highland has performed well even at some stages of the COVID pandemic <a href="https://www.inverness-courier.co.uk/news/highland-capital-ranked-number-one-for-safe-and-legal-escape-from-covid-constraints-219922/">https://www.inverness-courier.co.uk/news/highland-capital-ranked-number-one-for-safe-and-legal-escape-from-covid-constraints-219922/</a> ). THC consider Tourism plays such an important role it proposed it should be a cND (no.12) and expressed strong support in the Policy Topic response.</p> <p>Any policies aimed at expanding the tourism accommodation sector should be only undertaken following a comprehensive review, amalgamation and ‘levelling’ of the existing legislation, licensing requirements and taxation for all types of tourism accommodation, including motorhome, wild camping and short term letting.</p> <p>Many rural communities across Highland have seen the number of motorhome units and wild campers using car parks and informal parcels of land for overnight stays increasing. This use is largely unregulated (provision would be taken from the Caravan and Control of Development Act 1960) and thus uncontrollable, which has resulted in saturation point being reached across many communities, coupled with poor housekeeping (rubbish and waste disposal) by these users has resulted in a detrimental impact on our rural localities and the creation of friction between tourists and locals.</p> <p>Additionally, the growth of second homes for holiday purposes across rural communities has often priced local residents/key</p>



	<p>workers out of the local housing markets and has resulted in many communities becoming dormant during the winter months, which is having a negative impact on the creation of resilient communities.</p>
<p>Policy on housing for rural businesses</p>	<p>THC support the aim of ensuring rural prosperity in order to deliver sustainable resilient communities. Nevertheless clarity and care needs to be applied to define what is a rural business, why it needs to be located in the rural setting and what infrastructure it will need to service it, to ensure that it is sustainably located and does not in its own right undermine existing businesses or create an undue burden on the local authority.</p> <p>The creation of distant isolated businesses would also fundamentally conflict with the creation of resilient communities and reducing the need to travel (in terms of both employee commute and goods transportation).</p> <p>Given the pressure for housing development in our more accessible rural areas, Highland Council has significant experience of balancing the need to support rural business with rural housing expansion and has developed robust planning policies and guidance which supports and controls this form of development.</p> <p>Furthermore, Highland Council would not wish to see a policy develop with a blanket presumption for housing to support a business without due regard to good planning, or encourages unsustainable rural housing growth on the back of untested or undeveloped 'rural businesses' which often fail to materialize. The provision should be measured against the cost of delivering public service provision in remote rural areas and landscape protection.</p>
<p>Policy on impact of short term lets</p>	<p>The 2020 Consultation on Short Term Lets suggested it would be for LDPs to set policies to guide determination of applications within a control area. While a consistent national approach may be appropriate, consideration will need to be given to the localised impacts of short-term lets. However, a policy framework to guide the designation of control areas would be welcomed.</p>
<p>Supports developments for the 'creative' sector</p>	<p>THC consider the Creative Sector to be an important aspect of developing sustainable resilient communities and supports any enhancement in this regard.</p>
<p>Update policy of the importance of cultural facilities, including temporary uses – including using the Agent of Change principle</p>	<p>THC consider Cultural Facilities to be an important aspect of developing sustainable resilient communities and supports any enhancement in this regard. This policy should reflect and support the town centre first policy outlined in the 'Plan for Better Greener Places'. The use of the 'agent of change' principle is also supported in this regard.</p>
<p>Updated policy on heat networks, greater supports for connecting new builds</p>	<p>Heat networks are an important option to consider for THC in looking at decarbonising heat and tackling fuel poverty but, particularly given the rural nature of many Highland communities,</p>

	<p>alternatives will be an important part of the mix. Alternatives may even be more deliverable in the shorter term as heat networks often require strategic and coordinated capital investment as well as a critical mass/area depending on the heat source.</p> <p>The policy is too vague at the moment and we question how it sits with the relevant legislation already before parliament.</p> <p>A more holistic approach to the whole energy sector (not just electricity and heat) is required and this needs to be adequately funded or incentivized.</p> <p>Building Standards regulations may be the best way to achieve compliance with this.</p>
<p>Updated policy on fossil fuel extraction to reflect climate change and energy policy</p>	<p>THC asserts that a holistic approach to the whole energy sector (including funding) is required at a national level in terms of the generation, transmission, distribution, and consumption of energy. Such an approach would define and control Scotland's reduction on fossil fuels dependence.</p>
<p>Review 10yr landbanking for aggregate policy</p>	<p>There is little detail currently provided about the landbanking review. THC believes that a mapped minerals survey approach should be taken at a national level as previously promised by the SG. This should include information on net export and import to Scotland as a whole, to capture some of the larger markets outwith Scotland and assess deficiencies in our home grown supply.</p> <p>Additionally, the previous THC response included promoting consideration for minerals supply and demand for each local market area and the option of a national financial fund for community mitigation.</p>
<p>Policy on decarbonizing the transport system &amp; transport connectivity</p>	<p>THC supports the principle of decarbonizing the transport system through a modal shift away from motor vehicle road based travel as the preferred approach, including railways and scheduled air flights. Nevertheless, it has to be recognized that outwith urban centres road improvements scheme must still play a part to achieve efficient and economical driving styles and ease congestion currently experienced on some carriageways.</p> <p>Furthermore, the use of EV and H2 for HGVs, ferries and other shipping vessels should be promoted, the latter of which accords with the proposals around 'Opportunity Cromarty Firth' free trade zone submission.</p> <p>All work to decarbonizing the transport system should be done alongside the better integration of the public transport network, park and ride opportunities and active travel infrastructure.</p>
<p>Policy on Digital Rollout – pass to LA's to manage &amp; stronger support on new dev'ts to include infrastructure capacity</p>	<p>THC supports the digital rollout and sought stronger national policy support for innovative solutions to suit rural / remote areas and still believes this should be centralized to avoid the remoter areas being forgotten. The digital rollout will also assist in the</p>

	rural repopulation agenda and the support for new ways of working policy proposals above and therefore its importance should not be underestimated or underfunded.
Policy on new 'values-led approach' to inward investment	The Highland Council supports the movement towards the delivery of investment based on individual place based locational need, but contends such an approach must transect all levels of government and governmental organisations; and that these are fully and properly costed through the SG Investment Plan to ensure equality across regions and that communities receive their fair share of investment.
<b>A PLAN FOR BETTER GREENER PLACES</b>	
Update policy on Placemaking and review need for additional strands – MCA also to be part of this policy.	The embedding of Placemaking at the heart of NPF4 is strongly supported, on the proviso that any review includes a more coordinated approach to reflect rural issues and LPA's are permitted to determine its use. The use of MCA's has yet to be considered and greater information would be required as to how this would work in practice.
Place Standard Tool to be embedded throughout NPF4	THC agrees that the creation of high quality places should be at the heart of the Planning Process. However, the proposed use of the place standard tool as a key means of delivering this is questioned, as the tool has been developed to be a simple framework that considers physical elements against social aspects, whereas the ambition to transition to better, greener places especially with regard to delivering a positive effect on bio-diversity, peatland protection and woodland creation is not at the heart of this assessment tool.
Refresh Designing Streets to reflect on the 20min N'hood concept	Refresh of Designing Streets is welcomed. However, the Highland Council would argue that the starting point of any refresh is a review of whether the document itself is fit for purpose, including reviewing what it has achieved. Furthermore, clarity is required on how the refresh will be undertaken and if it is to become an integral part of NPF4 or if it will be a standalone document.
Update TC first policy and broaden mix of uses in TCs and support residential use	<p>The protection, creation and enhancement of vibrant safe and sustainable town and village centres is seen as paramount in the delivery of resilient communities and the 20 Minute Neighbourhoods (Communities) aspiration. To deliver this, a broad mix of uses within these areas would be supported (including conversion to a diverse mix of types and tenures of residential for both affordable and open market needs) providing protection and safeguards are afforded to regionally important music/cultural venues (Links with the 'Agent of Change principal outlined as a potential policy change in the 'Plan for a Wellbeing Economy' above) and that an evidence led approach is adopted to protect the vitality of the centre.</p> <p>Additionally, the majority of our urban cores, contain historic properties which were designed principally for their 'shop fronts' which collectively contribute to the pleasing appearance of the town or village setting. Furthermore, the majority of these properties are statutorily protected and therefore any policy</p>

	<p>allowing greater conversion away from retail (or service) use must provide adequate protection to the streetscape vistas.</p> <p>Issues around fragmented and distant ownership have plagued many towns and cities in recent years, resulting in a lack of maintenance and ‘ownership’ of common problems. In addressing this policy issue, aspects around ownership and maintenance should also be reflected upon.</p> <p>Finally, the long-term recovery from the COVID pandemic is still to be experienced and Highland would stress that a high degree of control and flexibility is retained at a local level, in order to permit rapid and responsive change if necessary.</p>
Prioritize vacant & derelict land over greenfield land in a new ‘Brownfield first approach’ – broaden definition of brownfield land	<p>THC agrees with the brownfield first approach, but the funding gap between brownfield and greenfield needs addressing, as well as stronger and simplified land acquisition powers. This policy should also support the greening of vacant/derelict land in urban areas for both short term (pending redevelopment) and long term bio-diversity improvements to urban areas rather than purely seeking built redevelopment.</p> <p>The current definition of brownfield land is considered fairly broad, as such THC does not necessarily see merit in significantly broadening the definition.</p> <p>Furthermore, the stronger support for prioritizing vacant &amp; derelict, should not come at the expense of the loss of Scotland’s non-designated built stock, 95% of which is currently not protected.</p>
Update Greenbelt policy – role as ‘natural infrastructure’	<p>The Council currently has no Greenbelts and does not believe they are needed in the Highland context. We do note, that the potential policy change described in the Position Statement indicates that further use of greenbelt policy might be warranted, if this is concluded, the Council would contend that their designation is undertaken at a local level.</p>
Policy on bio-diversity – positive effects and peatland effects	<p>THC strongly supports bio-diversity protection and enhancement; including our peatland areas and has suggested its protection as an cND. This policy should also support the greening of vacant/derelict land in urban areas for both short term (pending redevelopment) and long term bio-diversity improvements to urban areas.</p>
Strengthen policy on woodland protection & creation	<p>THC strongly supports the importance of native woodland creation and protection and as part of the initial response we have suggested it as a cND. However, the Council also recognizes the important contribution that ‘productive woodland’ makes to the area especially in terms of employment and delivering a sustainable local building product. As such this element should not be overlooked in any policy suggestion.</p>
Review policy on wildland to support repopulation agenda	<p>Whilst the Council would be concerned if Wild Land Areas were to unduly constrain appropriate regional growth, we do not disagree with the principle of safeguarding a wild land resource and recognize that in terms of Wild Land Areas as currently defined in</p>



	<p>Scotland, Highland hosts a large proportion of the resource. As currently operated, the Wild Land Area policy consideration does not, in our view, unduly constrain the growth of sustainable rural communities – and in our view, rural repopulation should primarily be focused around supporting and strengthening existing communities. We have yet to be convinced that such growth of communities would be threatened by the wild land constraint.</p> <p>Any review of policy on wildland (Wild Land Areas) needs to be based upon a clear understanding of any perceived threat. It should also have cognizance of ‘Isolated Coastline’ area/policy and the ‘in combination’ constraint effect.</p>
<p>Review and strengthen protection of the historic environment and the reuse of these forms of building</p>	<p>As part of the Highland Council initial Policy Topic response we have already sought greater protection of the historic environment/built heritage. This enhanced protection should be applied to both designated and non-designated buildings as 95% of Scotland built stock is not protected currently.</p>
<p>Consider whether Heritage Impact Assessments should be mandatory for all LB &amp; CAs applications</p>	<p>The Highland Council would support the introduction of Heritage Impact Assessments as a positive step in the protection of our built heritage, as they have delivered well thought out developments in other parts of the UK.</p>
<p>Policy on supporting the Blue &amp; Coastal economies</p>	<p>As the Highland region has a large blue carbon resource and extensive coastline any policy with regards to this aspect will have significant impact.</p> <p>Any proposal to revisit the marine and terrestrial planning system, must reflect the importance LPA’s play in marine planning, as the environment and the local community transcend the intertidal planning boundary.</p> <p>A potential planning policy aligning the Scotland’s Marine Plans, Sectoral plans for offshore wind and aquaculture, emerging regional marine plans, plans for our ports and harbours and the Blue Economy Action Plan would be generally welcomed subject to review and consultation on any potential wording and requirements.</p>