

Local Government, Housing and Planning Committee
Tuesday 24 June 2025
20th Meeting, 2025 (Session 6)

Fourth National Planning Framework (NPF4) annual review

Introduction

1. [National Planning Framework 4](#) (NPF4) was adopted by Scottish Ministers on 13 February 2023, following its unanimous approval by the Scottish Parliament on 11 January 2023. The Local Government, Housing and Planning Committee agreed that it would review on an annual basis whether NPF4 was achieving its intended ambitions.
2. The Committee agreed its approach to its consideration this year at meetings on 17 December 2024 and 22 April 2025. It held a call for views before agreeing to hear from two panels of witnesses and the Minister for Public Finance.
3. The purpose of this paper is to provide background information on NPF4 and details of the evidence session. A briefing from the Scottish Parliament Information Centre (SPICe) is included at **Annexe A**.

Fourth National Planning Framework

4. The Scottish Government adopted and published its fourth National Planning Framework (NPF4) in February 2023. NPF4 sets out Scottish Ministers' policies and proposals for the development and use of land to 2045 through a National Spatial Strategy, national developments, regional spatial priorities, and national planning policy which guides decision making on planning applications.
5. The Committee scrutinised the draft NPF4 in 2021 and 2022. In concluding its scrutiny of the draft NPF4, it agreed to undertake an annual review of NPF4 to assess whether it is realising its ambitions. The Committee held its first annual review in 2024, holding three evidence sessions.
6. The Committee wrote to the Minister for Public Finance on [26 June 2024](#) following up on the issues raised.
7. The Minister for Public Finance responded to the Committee on [30 August 2024](#).
8. In its [Tracker Report for 2023-24](#), the Committee concluded it was too early at that point to form any judgements on NPF4. Themes arising from the review in 2024 included:
 - The outcome of the Scottish Government's consultation on Investing in Planning – A consultation on resourcing Scotland's planning system;
 - The time taken to process planning applications, particularly the role of statutory consultees;

- The work of the National Planning Improvement Champion;
- How NPF4 can be used to support the response to the housing emergency;
- How the prominence of NPF4's commitment to addressing the climate and nature emergencies is manifesting in individual planning decisions and the impact of these key pillars of the framework overall;
- The stringency of the application of individual policies within NPF4 (key examples of Policy 5 on soils and Policy 22 on flooding were discussed); and
- Capacity building within communities to allow them to contribute to local plan plans and participate in the planning system in general.

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9. The Committee agreed in December 2024 that before deciding on the focus of its annual check-up on NPF4, it would invite key stakeholders to highlight issues that are arising in their engagement with the framework.

10. A call for views was issued on 3 February and received 42 responses.

11. Responses can be found at the following link:

- [Responses to the call for views on NPF4.](#)

12. Themes raised in the responses include—

- The funding and staffing of planning departments;
- The need for a hierarchy of policy objectives;
- A need for clarity and guidance on the implementation of specific NPF4 policies;
- Concerns about overly rigid interpretations of NPF4 policies and its impact on development;
- Increasing worries about older and out of date Local Development Plans and their impact on decision making; and
- Concerns about progress in the development of Local Place Plans.

13. On 8 May 2025, the Committee received correspondence from the Highland Council. In the letter, the Council supports Planning Democracy's call for the Government to initiate a review of equal rights of appeal. A copy of the letter can be found at the following link:

- [Letter from Highland Council, 8 May 2025](#)

14. On 3 June, the Committee heard from the first panel of stakeholders—

- Kevin Murphy, Director of Planning, [Homes for Scotland](#);
- Hazel Johnson, Director, [Built Environment Forum Scotland](#);
- Esmé Clelland, Senior Conservation Planner with [RSPB Scotland](#) and Convenor of [SE LINK's Planning Group](#).

15. The Official Report of the meeting on the 3 June can be found at the following link:

- [Official Report of Local Government, Housing and Planning Committee meeting 3 June 2025](#).

16. On 17 June, the Committee heard from the second panel of stakeholders—

- Dr Caroline Brown, Director of Scotland and Ireland, [Royal Town Planning Institute \(RTPI\)](#);
- Pamela Clifford, Chair and Chief Planning Officer at East Ayrshire Council, [Heads of Planning Scotland](#);
- Clare Symonds, Chief Officer, [Planning Democracy](#); and
- Neil Sutherland, founding director of MAKAR Limited.

17. The Official Report of the meeting on the 17 June will be published on the following page:

- [Official Report of Local Government, Housing and Planning Committee meetings](#)

18. The recording of the meeting can be accessed at the following link:

- [Scottish Parliament TV, Local Government, Housing and Planning Committee meeting 17 June](#)

19. A summary of the key points raised by the witnesses during both sessions is included in the SPICe briefing (**Annexe A**).

Meeting 24 June 2025

20. At its meeting on 17 June, the Committee will hear from the Minister for Public Finance. The Minister will be accompanied by—

- Fiona Simpson, Chief Planner/ Director of Planning, Architecture and Regeneration;

LGHP/S6/25/20/1

- Andy Kinnaird, Head of Transformation Planning;
- Carrie Thomson, Head of Development Planning and Housing; and
- Cara Davidson, Head of Environment and Net Zero.

**Clerks to the Committee
June 2025**

Annexe A – SPICe Briefing



National Planning Framework 4: Annual review

Introduction

[National Planning Framework 4](#) (NPF4) establishes the Scottish Government's spatial strategy for the development of Scotland up to 2045. It sets out spatial principles to guide the location and nature of development, identifies regional development priorities, lists 18 national developments considered vital to the delivery of the spatial strategy, and describes 33 national planning policies that influence every planning decision taken in Scotland.

NPF4 was adopted by Scottish Ministers on 13 February 2023, following its unanimous approval by the Scottish Parliament [on 11 January 2023](#). This is the second annual review into the impact that NPF4 has had on development across Scotland held by the Committee.

The Committee will take evidence from representatives of the Royal Town Planning Institute (RTPI), Heads of Planning Scotland (HoPS), Planning Democracy, and Neil Sutherland (founding director MAKAR Ltd).

Recent Scottish Government Action

The Scottish Government's Chief Planner [wrote to all local and national park authority chief planning officers](#) on 11 June 2025, setting out advice and guidance on the interpretation of NPF4 policy 22 (Flood risk and water management), this described the role of SEPA and Scottish Ministers, provided guidance on understanding flood risk, and a summary of action being taken to improve planners' understanding of flooding issues.

Changes to the planning fee regime, including an automatic annual fee increase linked to the Consumer Prices Index measure of inflation and imposition of fees for planning appeals and local reviews for the first time, came into force on 9 June 2025. Details are set out in [Planning circular 3/2025: fees for local reviews and appeals](#). The Committee has recently considered the subordinate legislation to make these changes.

Background

The key sections of the adopted NPF4 are:

National Spatial Strategy: The national spatial strategy guides decisions on future development across Scotland, which aims to produce:

- **Sustainable places**, which reduce emissions and restore and better connect biodiversity.
- **Liveable places**, where people can live better, healthier lives.
- **Productive places**, which produce a greener, fairer and more inclusive wellbeing economy.

The National Spatial Strategy is underpinned by six spatial principles for Scotland in 2045, these are a just transition, conserving and recycling assets, local living, compact urban growth, rebalanced development, and rural revitalisation. It also recognises the different challenges and opportunities across Scotland's regions, which are described in five geographic "regional spatial priorities".

National Developments: There are 18 national developments, which support the delivery of the National Spatial Strategy, these range from significant infrastructure projects such as the development of urban mass/rapid transit systems in Aberdeen, Edinburgh, and Glasgow, to the continued expansion of the Central Scotland Green Network.

National Planning Policy: NPF4 sets out 33 national planning policies, covering areas such as climate change, biodiversity, play, flood risk and other major land use policy matters.

Minimum All-tenure Housing Land Requirements: This section sets out the minimum number of housing units that local, city-region and national park authorities must plan, as a minimum, to accommodate in future development plans. [The Scottish Government has provided an explanatory report of how the MATHLR has been calculated.](#)

NPF4 Delivery Programme

The Scottish Government published its third [NPF4 Delivery programme](#) in October 2024. This includes a summary of NPF4 related actions taken to date and priorities for delivery over the next year. The Programme states that:

"During the last year we have been developing our approach to monitoring and measuring progress on NPF4's impact. The speed of change will vary both across the country and between policy areas. It is important to monitor long-term change and for the monitoring framework to evolve over time. Given the significant lead-in time for development projects, trends will likely not emerge for some time and will not be wholly attributable to the impact of NPF4: A broad range of influences will be at work, among which planning has a key role in creating the circumstances for, and overcoming barriers to, change."

Key points from the progress to date include:

- Progress on developing new style Local Development Plans (LDPs) is limited. Every planning authority must produce an evidence report, which sets out the evidence to be used in drafting an LDP. The evidence report is considered by

an independent Reporter in the gatecheck exercise. The Reporter decides whether the evidence base is sufficient or that further evidence needs to be gathered. If further evidence is needed, then the authority will be required to gather and resubmit the evidence report for further consideration. Just six evidence reports have been submitted so far, with two judged to be adequate, two inadequate and a further two awaiting decision.

- Progress on most national developments was limited, with no action on some and initial development work being undertaken on others. This is not unusual given the timeframe covered by NPF4.
- The Scottish Government has published guidance on 20-minute neighbourhoods, play sufficiency assessments, digital telecommunications, research on assessing lifecycle greenhouse gas emissions from new developments, and draft guidance on assessing biodiversity impacts. It has established a Peatland Expert Advisory Group and Scottish Forestry is undertaking a review to support the development of Forestry and Woodland Strategies. The Scottish Government is working with Heads of Planning Scotland and the renewable energy sector on community benefit matters, it is also developing guidance on the consenting regime for hydrogen developments. Several actions have also been taken to support the delivery of new homes.
- Several initiatives aimed at increasing the number of planners and their skills are highlighted, including appointing the national planning improvement champion, bursaries for student planners, review of permitted development rights, and begun a review of compulsory purchase powers.

Issues raised in written evidence

The Committee issued a call for views on 3 February 2025, asking planning stakeholders to outline their opinions on the implementation of NPF4 and its effectiveness in delivering Scottish Government policy goals. The closing date for submissions was 7 March 2025. Thirty-seven responses were received – principally from planning and development industry representative and professional bodies, and environmental and build environment NGOs.

Key issues include:

- Support for the Planning Improvement Champion Role and the creation of the planning hub.
- Significant concern about the resourcing and staffing of planning departments.
- Continued calls for the development of a policy hierarchy, to support certainty in decision making.
- Calls for guidance on assessing climate and biodiversity impacts of development proposals to be published.
- Concerns about overly rigid interpretation of national policies stifling development, especially in rural areas.
- Concerns about an increasing number of out-of-date development plans and slow progress in drafting new plans.

Key issues raised in evidence at the meetings of 3 and 17 June 2025

The Committee has heard evidence on the implementation of NPF4 from the Built Environment Forum Scotland (BEFS), Homes for Scotland, Scottish Environment Link, Royal Town Planning Institute, Heads of Planning Scotland, Planning Democracy, and Neil Sutherland (MAKAR Ltd). Key issues raised in that evidence include:

- Given the time lag between the granting of planning permission and the completion of developments, it is still too early to assess the impact that NPF4 is having on the location, type, and form of development in Scotland.
- There remain unresolved tensions between policy priorities on issues such as climate, biodiversity, economic development, protecting peatlands, and rolling out renewable energy developments. Scottish Government guidance is still needed in several key issues. Concerns have been expressed about the time being taken to develop this guidance and the resource allocated to doing so.
- NPF4 was adopted before the Scottish Government declared a housing emergency. Some stakeholders argue that the policy approach to housing in NPF4 is unlikely to deliver the number, type, and quality of homes in the locations people want to live in future years. There have been calls for housing aspects of NPF4 to be revised.
- NPF4, and the associated national and local planning advice and guidance, documents are difficult to access and understand as a coherent whole. This hinders understanding of the planning system by the public and stakeholders alike. It is hard to know what is in force, when documents are updated or whether policies are supplemented by additional advice.
- There were concerns about why some Local Development Plan evidence reports¹ are being returned to planning authorities following the gatecheck exercise – as this is delaying the development of new plans.
- The interpretation of policy 22 (Flood risk and water management) is limiting developers' ability to build in many areas previously considered acceptable for development. **The Scottish Government's Chief Planner wrote to planning authorities on this issue last week.**

¹ Planning authorities are required to produce an "evidence report" setting out the evidence to be used in drafting any new local development plan. These reports are submitted to Scottish Ministers and the subject of a "gatecheck" by an independent planning Reporter appointed by Ministers. The Reporter may decide the evidence base is sufficient or that further evidence needs to be gathered. If further evidence is needed, then the authority will be required to gather and re-submit the evidence report to Ministers for further consideration.

- There is evidence that some developers are not meeting conditions attached to awards of planning permission, particularly with regard nature and biodiversity, and that some planning authorities do not have the resolve or resources to pursue enforcement action where this is the case.
- Insufficient funding of planning departments and a lack of qualified staff is hampering many aspects of the planning system – including slowing planning decisions, delaying the drafting of development plans, preventing the development of Masterplan Consent Areas, and providing support to communities wishing to draft Local Place Plans.

Alan Rehfisch, Senior Researcher, SPICe

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