Response ID ANON-BM8Q-KX97-B

Submitted to Draft National Planning Framework 4
Submitted on 2022-03-31 10:19:28

Questions - Part 1 – A National Spatial Strategy for Scotland 2045

1 Sustainable places.Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment. Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?:

It's great to read the importance design practice is given in the delivery of sustainable places. There are opportunities for other creative and cultural practice to deliver this.

Creative practice (like design) shares skills and perspectives in a technical capacity as described in the draft. But they also re-imagine our places and can embed sustainability within them.

There are successful projects where embedding practicing artists into places can bring new perspectives and processes to planning projects. These include artists recovering old mining sites into useful community spaces in Ohio. And Glasgow's own Creative Communities project.

The draft's definition of circular economy could be more ambitious. The draft explains 'A circular economy… is designed to reduce the demand for raw material in products'. While it might be helpful to illustrate the waste hierarchy, it would be more progressive in this section to define waste and pollution as design flaws. Instead the draft only 'encourages' (page 92) the use of previously used materials.

Rather than explain circular economy as a reduction in demand of raw materials, it should be clearer that the aim is to close material loops, and shut-off any route for materials to reach landfill.

Recovery and restoration of our natural environment should prioritise design's impact on the community over the intentions of the designer. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the Scottish Government would consider signing up to the principles.

1 https://www.creativecarbonscotland.com/project/the-embedded-artist/
2 http://magazine.art21.org/2010/08/24/frances-whitehead-embedded-artist/#.Yjr69binzw5
3 https://www.glasgowlife.org.uk/arts-music-and-cultural-venues/creative-communities-artists-in-residence
4 https://ellenmacarthurfoundation.org/eliminate-waste-and-pollution
5 https://ellenmacarthurfoundation.org/circulate-products-and-materials
6 https://designjustice.org/principles-overview

2 Liveable places.Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?:

The aim to make use of our spaces celebrate our culture, diversity and heritage is noted and appreciated.

The Liveable Places page in this section introduces the concept of 20 minute neighbourhoods. This model of neighbourhoods may not map into what currently works in rural communities. The principle is designed so that all people can meet the majority of their daily needs within approximately 800m. This suggests distances beyond 800m are too far, or inconvenient. However what looks like inconvenience from the outside might embodied something essential to those who live there.

Rural areas are source of valuable alternative models to 20 Minute neighbourhoods. Many central belt communities are not so much post-industrial as reverting to a pre-industrial model, with a mix of self-employment, small (often craft) businesses, people with multiple jobs, and with such communities often effectively made into islands by poor transport links. Rural communities have had generations of coping with such models; these former industrial areas have seen massive change in just one generation.

Mobile services can create connected neighbourhoods. Mobile cinemas, galleries and libraries, for example, create social occasions. They create opportunities for communities to meet.

These cultural services encourage and enable the gathering of people to participate in a community event, which produces a local opportunity for connection and belonging, reducing isolation, and improving mental health.

The many urban peripheral housing estates which lack access to facilities, also lack the accessible and affordable transport links to bring their inhabitants to the city or town centre. These communities need to be considered in between the needs of rural and urban.

While recognising the strategy is to change the way we live in the future, it's important we work towards community-led and community-controlled outcomes. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the Scottish Government would consider signing

up to the principles.

7 https://www.screenmachine.co.uk/
8 https://www.euro.who.int/en/publications/abstracts/what-is-the-evidence-on-the-role-of-the-arts-in-improving-health-and-well-being-a-scoping-review-2019
9 https://designjustice.org/principles-overview

3 Productive places.Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing.Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?:

4 Distinctive places.Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?:

5 Distinctive places.Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?:

Our places should incorporate 'communities of interest' as well as local residents. Some people travel to an area to use the pool, library. Community should not be limited to the idea of local residents.

There is some risk that assumptions are made about what people want without applying user-centred-design. We can't' assume that's what everyone wants and needs. Instead of a focus on safe and pleasant places, could we focus on what safe and pleasant places create? i.e. inclusive and connected.

6 Spatial principles.Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

Do you agree that these spatial principles will enable the right choices to be made about where development should be located?:

7 Spatial Strategy Action Areas.Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?:

Throughout the document the NPF4 uses the word 'Recreation'. Recreation is not really used in day to day language and means different things to different people.
We propose that 'Recreation' is replaced throughout with 'Culture and Leisure'.

Action 2: Support the Blue and Wellbeing Economies

It may be useful to include a definition of Blue Economy and Wellbeing Economy within this action. For example;

Blue Economy

The 'Blue Economy' is an emerging concept which encourages better stewardship of our ocean or 'blue' resources. It underpins the thinking behind the Commonwealth Blue Charter, highlighting in particular the close linkages between the ocean, climate change, and the wellbeing of the people of the Commonwealth.

Wellbeing Economy

A Wellbeing Economy is certain about going 'beyond GDP', and to complement – or even replace – the metric with a broader set of social and environmental indicators fed by the ever-growing amount of publicly available data on wellbeing.

This is what enables the Wellbeing Economy to tackle some of society's most looming issues such as loneliness and mental health problems, as well as complex climate and environmental challenges.

This section misses out the arts, museums and creative industries. It's important to remember that residents and tourists are also interested in attending art galleries, cinemas, museums, theatres and music venues. There is good inclusion of heritage via the tourism sections and world heritage sites.

There is a need to include arts, museums and creative industries in this action, otherwise we're making assumptions about what people want to do with

their time and missing the opportunity to offer people a sense of belonging and connection.

When we're thinking of improving outdoor infrastructure for camping for example, we need to also consider what will people be doing, what's the view from the tent? Is there a bandstand or potential for a natural amphitheater?

If this action included arts, museums and creative industries it may look like this:

'Arts, museums and creative industries are a key sector, improvements in infrastructure and internet connectivity will ensure this sector can continue to make our places vibrant, interesting and beautiful. The sense of wellbeing of residents and visitors depend on the offering of opportunities to connect with each other, this is why the arts, museums and creative industries are important, they offer a chance to make a connection, a chance to belong, and this should not be overlooked.'

Our weather means it's not always possible to be outside in Scotland. We need to design outside spaces to keep the wind away, maximise light etc. We have to prioritise user-centred-design.

Action 19: Grow a wellbeing economy

This action reads a little like we should focus on economic growth with the understanding that we should remember to think about how there might be hidden wellbeing impacts coming from the traditional view of economic growth. The focus seems to be on traditional forms of economic growth, with a nod to other additional potential benefits. This will not lead us to realisation of a wellbeing economy.

This action misses out valuable jobs and industries, such as software and games development, a key growth sector. If we want to attract people to Scotland, we have to have a cultural offer. A job in a space-port will be available to very few people; whereas tech jobs could be available to thousands, if we create places were people want to live. e.g. Places with libraries, gardens, hot-desk hubs, cafes, cinemas, parks. This is why it's important to look more closely at the word wellbeing. We don't have to start with economic growth and end up with wellbeing. We could if we were radical start with wellbeing and end up with economic growth.

The last paragraph of this action leans towards this, as follows:

"Significant investment in our health and social care, justice and learning estates will continue to provide important sources of employment and income for smaller scale local businesses.

Town centres throughout this area will also play a critical role in driving a new economic future. The recent town centre review highlights opportunities to expand the range of services and facilities they offer, reuse redundant buildings and provide new homes for a wide range of people. This in turn will ensure their crucial role in defining our sense of place is protected and enhanced, future-proofing a key asset for Scotland as a whole."

I think this should be the first paragraph and not the last paragraph as this is where we need to get to. It's important to centre this thinking and to include a definition of wellbeing economy.

In relation to all of the above, please see the link below to a recent piece in the Scotsman by Councillor John Alexander.

Dundee Waterfront
Would it be possible to include the significance of the cultural offer in Dundee to the success of securing transformational projects?
From Page 16:
"Continued delivery of the waterfront transformation is crucial to securing the role of the city as a location for investment in the net zero economy." For example please see a recent piece in the Scotsman from Councillor Alexander.

10 https://thecommonwealth.org/blue-economy
11 https://weall.org/
12 https://www.gov.scot/publications/growth-sector-statistics/
13 https://www.gov.scot/publications/new-future-scotlands-town-centres/
14 https://www.scotsman.com/news/opinion/columnists/how-cultural-activity-can-fuel-scotlands-covid-recovery-john-alexander-3502365
15 https://www.scotsman.com/news/opinion/columnists/how-cultural-activity-can-fuel-scotlands-covid-recovery-john-alexander-3502365

8 North and west coastal innovation.Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

9 North and west coastal innovation.What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area? :

10 Northern revitalisation.Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

11 Northern revitalisation.What are your views on these strategic actions for this action area?

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12 North east transition.Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

13 North east transition.What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

14 Central urban transformation.Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area? :

15 Central urban transformation.What are your views on these strategic actions for this action area?

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16 Southern sustainability.Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?:

17 Southern sustainability.What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?:

18 National Spatial Strategy.What are your overall views on this proposed national spatial strategy?

What are your overall views on this proposed national spatial strategy?:

Questions - Part 2 - National developments

19 Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?

Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?:

20 Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?:

21 Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?:

Questions - Part 3 – National Planning Policy

22 Sustainable Places.We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions? :

23 Policy 1: Plan-led approach to sustainable development.Do you agree with this policy approach?

Do you agree with this policy approach?:

24 Policy 2: Climate emergency.Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency? :

25 Policy 3: Nature crisis.Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis? :

26 Policy 4: Human rights and equality.Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?:

The process we currently use to consult communities is not user-led. When we create tools such as the Place Standard, although well-meaning, we are deciding what the parameters of the conversation with communities is, in advance.

Whoever controls the questions, controls the outcome. Community consultation technology is currently produced outwith Planning Legislation and therefor has the power to quietly control outcomes for communities.

Our planning should prioritise design's impact on the community over the intentions of the designer. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the Scottish Government would consider signing up to the principles.

In order to ensure that design of technology is user-led, Culture Counts would support the exploration of the idea of appointing V&A Dundee as a statutory consultee for the development of any future government led consultation tools. V&A Dundee would be consulted on the development of software for the purpose of community consultation to ensure that user-centred-design principles are followed.

16 https://designjustice.org/principles-overview
17 https://www.vam.ac.uk/dundee

27 Policy 5: Community wealth buildingDo you agree that planning policy should support community wealth building, and does this policy deliver this?

Do you agree that planning policy should support community wealth building, and does this policy deliver this?:

We agree that planning policy should support community wealth building (CWB), but it would be useful to include a definition of CWB in the draft. For example;

'Community wealth building is a progressive approach to economics and economic development. It seeks to change the way that our economies have come to function by aiming to retain more wealth and opportunity for the benefit of local people. .'

Scotland's recently published strategy for economic transformation relies on local authorities to include everyone involved in the economy from freelancers and social enterprises to big corporates. It is a mistake to overlook the contributions of individuals and SMEs who are often hidden from statistics. We need to ensure inclusion and NPF4 could lead the way.

An example of how culture and creative industries can lead community wealth building can be found in Islington. The Council leases office space and ensures it benefits local people and businesses. The Council has entered into a partnership with the local creative industries sector (specifically a tech cooperative), to support the creation of worker-owned businesses in the area. The also increased access of black and minority ethnic and women residents into the tech and digital sectors.

Islington Council has local people at the centre of its economic development. Working with local cultural organisations has engaged new people in employment and skills programmes. For example, a local fashion design and garment making coop has developed accredited training, employment opportunities and new local businesses in partnership with the council.

We must actively encourage and include other sectors and smaller businesses into the process. Our members have expressed a sense of exclusion from procurement. For Local Authorities to become more inclusive they need to reach out and invite participation from a broader range of sectors. It's not enough to just 'be open' to applications. Actively reaching out to local businesses, organisations and self-employed communities is needed.

Self-employed people, partnerships and local consortiums need to be involved. Some local authorities have introduced Supplier Development Programmes and websites to support SMEs within the procurement process. One authority also held a Business Gateway Workshop on Winning Public Procurement to provide information and practical sessions to businesses on finding and tendering for contracts. This is positive though in the majority of areas local authorities do not have a proactive approach to encouraging freelancers, partnerships and local consortiums. A simple, transparent and open system that encourages local partnerships and consortiums is needed to align structure and process with equality of opportunity across Scotland.

1 https://cles.org.uk/what-is-community-wealth-building/the-principles-of-community-wealth-building/
2 https://www.gov.scot/publications/scotlands-national-strategy-economic-transformation/
3 https://cles.org.uk/community-wealth-building-in-practice/community-wealth-building-places/community-wealth-building-in-islington/
4
https://www.islington.media/news/islington-council-and-fashion-co-operative-open-unique-affordable-workspace-supporting-local-fashion-talent-in-latest-chapter-

28 Policy 6: Design, quality and place.Do you agree that this policy will enable the planning system to promote design, quality and place?

Do you agree that this policy will enable the planning system to promote design, quality and place?:

The six qualities of successful places

Designed for life-long health and wellbeing

This section only offers 'active' solutions to physical health and wellbeing.
Whereas people access health and wellbeing in various ways including by attending a local choir, or dance group. Other solutions could be covered in this proposed re-draft'

"By encouraging healthy lifestyles, through walkable neighbourhoods, as well as opportunities for connection and belonging, we can ensure equitable access for everyone (regardless of gender, age, ability and culture) to well-designed buildings and a nature-rich local environment, including quality blue/green spaces that are cared for and well maintained."

Safe and pleasant

Why is the word joy in quote marks? It seems like what this paragraph is getting at is more along the lines of:

"designing, or retrofitting spaces of all sizes and purpose to enable connection and belonging, to encourage happiness and a sense of joy"

This section could be called 'Connection and Belonging' instead of 'Safe and pleasant'. The word playful seems to infantilise the feeling of happiness, like I have to pretend to be a kid, in order to feel happy.

Adaptable

A re-draft (to include user centred design) "By building in flexibility in line with circular economy principles, so that they can quickly be changed to accommodate different uses as well as maintained over time. By recognising the need for consultation and user-centred-design to change and cope with social, economic and environmental pressures as well as accepting the critical role of ongoing maintenance to ensure resilience and community wellbeing over time."

29 Policy 7: Local living.Do you agree that this policy sufficiently addresses the need to support local living?

Do you agree that this policy sufficiently addresses the need to support local living? :

20 Minute Neighbourhoods

On page 74 b) Arts and culture should be included in this list alongside sport / playgrounds etc.

There is currently no mention of culture in the 20-minute neighbourhood section of the draft NPF4. The section (page 73-74) should include;

A paragraph recognising the importance of mobile culture and leisure services such as cinemas, museums, galleries and libraries.

A paragraph on the need for a user-centred approach to the scaling of 20-minute neighbourhood principles in rural areas. What currently works for rural communities needs considering for scaling to be successful. The draft is clear on the need to reflect the particular characteristics of an area. But 'how' that's done is vital.

Throughout the document, the draft uses the word 'Recreation'. Recreation is not used in day to day language and means different things to different people. We propose 'Culture and Leisure' replaces 'Recreation' throughout.

From page 73 "The application of the 20 Minute Neighbourhood will vary across the country and will need to be adjusted to suit local circumstances particularly in rural areas where the delivery of services and extent of local infrastructure may not necessarily be supported by the surrounding density of population."

The meaning of the second half of this sentence is unclear. Do the drafters mean there aren't enough people in rural areas to apply the 20 minute principle? There is a need for clarity on 'how' 20 minute neighbourhood principles apply to less populated areas.

The 20 minute model of neighbourhoods may not map into what currently works in rural communities. The principle is designed so that all people can meet the majority of their daily needs within approx. 800m. This suggests distances beyond 800m are too far, or inconvenient. However what looks like inconvenience from the outside might embodied something essential to those who live there.

Mobile services can create connected neighbourhoods. Mobile cinemas and libraries, for example, create social occasions. They create opportunities for communities to meet and to feel a sense of connection and belonging.

These cultural services encourage and enable the gathering of people to participate in a community event, which produces a local opportunity for connection and belonging, reducing isolation, and improving mental health.

While recognising the strategy is to change the way we live in the future, it's important we work towards community-led and community-controlled outcomes. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the Scottish Government would consider signing up to the principles.

Rural areas are source of valuable alternative models to 20 Minute neighbourhoods. Many central belt communities are not so much post-industrial as reverting to a pre-industrial model, with a mix of self-employment, small (often craft) businesses, people with multiple jobs, and with such communities often effectively made into islands by poor transport links. Rural communities have had generations of coping with such models; these former industrial areas have seen massive change in just one generation.

The many urban peripheral housing estates which lack access to facilities, also lack the accessible and affordable transport links to bring their inhabitants to the city or town centre. These communities need to be considered in between the needs of rural and urban.

The 20 minute neighbourhood principle is clear in encouraging people to live more locally.
This requires places to provide communities with local access to a wide range of facilities. The National Performance Framework Outcome for Culture reads: We are creative and our vibrant and diverse cultures are celebrated and enjoyed widely. A baseline of how much provision isn't clear. We can't have a cinema every 800 meters, but could there be a base-level commitment to access to culture? i.e.

A town with 10,000 inhabitants should have access to:

High Speed Broadband [minimum xx MbPS]
Local cinema provision [within xx miles]
Local visual arts provision [within yy miles]
Local performing arts provision [within zz miles]
Access to National Companies' work xx times per year
Access to a place to perform work within x miles
Access to a place to rehearse and or make work within x miles

Mixed-use Spaces

One idea form the draft suggests the focus should be on maintaining mixed uses and improving the quality and diversity of local areas. However many cultural activities require very specific facilities, much like sport.

A community space that tries to offer everything will potential offer very little in the way of cultural engagement. A choir rehearsal needs good acoustics. A printmaking workshop requires a wet studio. Embracing local specialisms, the expense of variety, can offer a deeper connection to the activity, people and place.

Arts and culture, like sport, requires spaces for excellence and spaces for access.

An example of Access is Feis Ros
An example of Excellence is the Royal Conservatoire of Scotland

In our liveable places we need to have access to places to make and rehearse and be within reasonable distance of places to perform at the highest level.

Falkirk Council have a well-resourced offer to communities of interest, ensuring access within a reasonable travel time, for example Falkirk has a concert venue and theatre space, library, and museum

Bo'ness has a cinema, a range of halls, performance and event spaces, a library, and a museum at Kinneil.

Grangemouth has a range of halls for hire which can be used for performing arts, including as rehearsal spaces and a stadium which can be used for large scale concerts.

Even smaller towns within the Falkirk area such as Denny, Slammanan (population 1400 approx) and Bonnybirdge have community facilities available, including libraries. The library is placed in a disused shop front on the main street.

18 https://www.screenmachine.co.uk/
19 https://designjustice.org/principles-overview
20 https://feisrois.org/
21 https://www.rcs.ac.uk/

30 Policy 8: Infrastructure First.Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?:

31 Policy 9: Quality homes.Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?:

What is Antigypsyism/anti-Tsiganism/ Romaphobia?
Antigypsyism/anti-Tsiganism/Romaphobia essentially means the same thing and is a specific and long-established form of racism. Throughout history, the words "Gypsy", "Tsigane/Zigeuner", and similar terms, have been used. These words have taken a derogatory connotation in very many languages. This section is not using enabling language, it's providing a list of ways to stop people living in a particular way.

32 Policy 10: Sustainable transport.Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?:

33 Policy 11: heat and cooling.Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures? :

34 Policy 12: Blue and green infrastructure, play and sport.Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?:

35 Policy 13: Sustainable flood risk and water management.Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?

Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?:

36 Policies 14 and 15 – Health, wellbeing and safety.Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?:

37 Policy 16 – land and premises for business and employment.Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?:

Questions - Part 3 - National Planning Policy continued

38 Policy 17: Sustainable tourism.Do you agree that this policy will help to inspire people to visit scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

Do you agree that this policy will help to inspire people to visit scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?:

39 Policy 18: Culture and creativity.Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?:

t's great to see that the impact of culture and creative industries has been recognised and included in NPF4. The Scottish Governments commitment and realisation of the Agent of Change principle is noted and appreciated.

Policy 18b

I'm not sure that 'public art' is the phrase that the drafter intends? Instead, we could consider for example:

b) Development proposals should consider how to provide opportunities for community belonging and connection by consulting the arts and creative community where they involve a significant change to, or the creation of, new public spaces.

It's not about including a piece of public art, to make the place look nice. It's about creating beautiful spaces where people can connect with other people and feel a sense of belonging. Working with the local arts and creative community to think things through will produce ideas which wouldn't have otherwise been realised.

40 Policy 19: Green energyDo you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?

Do you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?:

41 Policy 20: Zero waste.Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?:

The policy needs to more clearly articulate that demolition is worse case scenario. The greener building is the one that already exists. Re-use of existing building needs more eight in this section. Retro-fitting existing building, and more flexible understanding of re-use through design can help achieve the important circular economy principles this draft aims to prioritise.

Our recovery and restoration of our natural environment should prioritise design's impact on the community over the intentions of the designer. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the Scottish Government would consider signing up to the principles.

It's great to read the importance design practice is given in the delivery of sustainable places. There are also opportunities for wider creative and cultural practice to deliver sustainable places.

Creative practice (like design) shares skills and perspectives in a technical capacity as described in the draft. But they also re-imagine our places and can embed sustainability within them.

There are successful projects where embedding practicing artists into places can bring new perspectives and processes to planning projects. These include artists recovering old mining sites into useful community spaces in Ohio. And Glasgow's own Creative Communities project.

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Rather than explain circular economy as a reduction in demand of raw materials, it should be clearer that the aim is to close material loops, and shut-off any route for materials to reach landfill.

22 https://designjustice.org/principles-overview
23 https://www.creativecarbonscotland.com/project/the-embedded-artist/
24 http://magazine.art21.org/2010/08/24/frances-whitehead-embedded-artist/#.Yjr69binzw5
25 https://www.glasgowlife.org.uk/arts-music-and-cultural-venues/creative-communities-artists-in-residence
26 https://ellenmacarthurfoundation.org/eliminate-waste-and-pollution
27 https://ellenmacarthurfoundation.org/circulate-products-and-materials

42 Policy 21: Aquaculture.Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?

Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?:

43 Policy 22: Minerals.Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?:

44 Policy 23: Digital infrastructure.Do you agree that this policy ensures all of our places will be digitally connected?

Do you agree that this policy ensures all of our places will be digitally connected?:

The draft often refers to digital infrastructure reducing unsustainable travel, and as a means of delivering principles such as 20 minute neighbourhoods in rural communities. However these digital services can have significant environmental impact that isn't addressed in the draft. As we continue to consume more internet data, the electricity consumed by the internet is growing too. Every click, swipe and log in has an energy cost. Energy efficient digital design28 can include;

digital service providers using green hosting
reducing friction in user journeys through UX design
clean and efficient code that minimises server load

28 https://www.wholegraindigital.com/blog/website-energy-efficiency/

45 Policies 24 to 27 – Distinctive places.Do you agree that these policies will ensure Scotland's places will support low carbon urban living?

Do you agree that these policies will ensure Scotland's places will support low carbon urban living?:

Development proposals.
b) If the development is for the reuse of a vacant building it should be demonstrated that the existing use is no longer viable.

A more flexible definition re-use, and clearer definition of 'viable' is desirable in this section. What would viable mean for a non-profit culture venue? What value or viability would an existing use need to demonstrate?

Town Centre Living section could also reiterate the agent of change principle.

46 Policy 28: Historic assets and placesDo you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings?

Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings? :

Should community consultation take place before a building is demolished? It could be that the local authority do not deem the building to be valuable, whereas the local community disagree.

There is also often scope for arts, heritage and creative industries to use buildings and re-purpose them. For example The Whisky Bond in Glasgow.

The policy needs to more clearly articulate that demolition is worse case scenario. The greener building is the one that already exists. Re-use of existing building needs more eight in this section. Retro-fitting existing building, and more flexible understanding of re-use through design can help achieve the important circular economy principles this draft aims to prioritise.

47 Policy 29: Urban edges and the green belt.Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?:

48 Policy 30: Vacant and derelict land.Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?:

49 Policy 31: Rural places.Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

Do you agree that this policy will ensure that rural places can be vibrant and sustainable? :

50 Policy 32: Natural places.Do you agree that this policy will protect and restore natural places?

Do you agree that this policy will protect and restore natural places?:

51 Policy 33: Peat and carbon rich soils.Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands? :

52 Policy 34 – Trees, woodland and forestry:Do you agree that this policy will expand woodland cover and protect existing woodland?

Do you agree that this policy will expand woodland cover and protect existing woodland?:

53 Policy 35: Coasts.Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?:

Questions - Part 4 - Delivering our spatial strategy

54 Do you agree with our proposed priorities for the delivery of the spatial strategy?

Do you agree with our proposed priorities for the delivery of the spatial strategy?:

55 Do you have any other comments on the delivery of the spatial strategy?

Do you have any other comments on the delivery of the spatial strategy?:

Questions - Part 5 - Annexes

56 Annex A.Do you agree that the development measures identified will contribute to each of the outcomes identified in section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

Do you agree that the development measures identified will contribute to each of the outcomes identified in section 3a(3)(c) of the Town and Country Planning (Scotland) Act 1997? :

57 Annex B.Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?

Do you agree with the minimum all-tenure housing land requirement (mathlr) numbers identified above?:

58 Annex C.Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?:

Questions - Integrated Impact Assessments

59 Environmental Report.What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? :

60 Environmental Report.What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.

What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.:

61 Environmental Report.What are your views on the potential health effects of the proposed national developments as set out in the environmental report?

What are your views on the potential health effects of the proposed national developments as set out in the environmental report?:

62 Environmental Report.What are your views on the assessment of alternatives as set out in the environmental report?

What are your views on the assessment of alternatives as set out in the environmental report?:

63 Environmental Report.What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?:

64 Society and Equalities Impact Assessment.What are your views on the evidence and information to inform the society and equalities impact assessment?

What are your views on the evidence and information to inform the society and equalities impact assessment?:

65 Society and Equalities Impact Assessment.Do you have any comments on the findings of the equalities impact assessment?

Do you have any comments on the findings of the equalities impact assessment?:

66 Society and Equalities Impact Assessment.Do you have any comments on the findings of the children's rights and wellbeing impact assessment?

Do you have any comments on the findings of the children's rights and wellbeing impact assessment?:

67 Society and Equalities Impact Assessment.Do you have any comments on the fairer Scotland duty and the draft NPF4?

Do you have any comments on the fairer Scotland duty and the draft NPF4?:

68 Society and Equalities Impact Assessment.Do you have any comments on the consideration of human rights and the draft NPF4?

Do you have any comments on the consideration of human rights and the draft NPF4?:

Do you have any comments on the consideration of human rights and the draft NPF4?:

69 Society and Equalities Impact Assessment.Do you have any comments on the islands impact assessment?

Do you have any comments on the islands impact assessment?:

70 Business and Regulatory Impact Assessment.Do you have any comments on the partial business and regulatory impact assessment?

Do you have any comments on the partial business and regulatory impact assessment? :

About you

What is your name?

Name:
Andy Robertson

What is your email address?

Email:
andy@culturecounts.scot

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Culture Counts

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: