



Law Society  
of Scotland

# Consultation response

## Draft National Planning Framework 4

January 2022



## Introduction

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The Law Society of Scotland is the professional body for over 12,000 Scottish solicitors.

We are a regulator that sets and enforces standards for the solicitor profession which helps people in need and supports business in Scotland, the UK and overseas. We support solicitors and drive change to ensure Scotland has a strong, successful and diverse legal profession. We represent our members and wider society when speaking out on human rights and the rule of law. We also seek to influence changes to legislation and the operation of our justice system as part of our work towards a fairer and more just society.

Our Planning Law Sub-committee welcomes the opportunity to respond to the Scottish Parliament's call for views on *National Planning Framework (NPF4)*<sup>1</sup>. We have the following comments for consideration.

We are in the process of considering the draft NPF4 in full and will be responding to the Scottish Government's consultation in due course. While our response captures our initial comments on a range of issues, we have not been able to consider all matters in full at this stage.

## Consultation response

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### Consultation and development of the draft NPF4

**Please provide your views on the consultation and development of NPF4 and how this has contributed to the draft.**

No comment.

**Please provide your views on the structure of the National Planning Framework 4 document.**

Given the additional statutory requirements (duties and responsibilities) for NPF4 contained in section 3A of the Town and Country Planning (Scotland) Act 1997, we consider that it would be prudent to cross-check that the draft NPF4 is fully compliant. In particular, we note further comments below regarding housing needs including those of older people and disabled people, in connection with Policy 9. The structure of the document makes the checking exercise somewhat challenging, and we suggest that a short chapter be included setting out those statutory requirements in a single place and identifying where these are discharged in the document itself. We consider that this will reduce the potential for the legality of NPF4 being challenged.

<sup>1</sup> <https://yourviews.parliament.scot/lqc/npf4/>

We note that there was previously, under Scottish Planning Policy (SPP, para 28-29), a policy principle of a presumption in favour of sustainable development which was considered to be a matter of great importance with clearly set out with criteria to assess applications. This presumption had been engaged in a number of key planning decisions. While we appreciate that the presumption is now being cast in a different way to in the past and that there is a need to allow some flexibility within NPF4, we consider that the concept of sustainable development needs to be more clearly embedded across the draft NPF4 with explicit references included. National Outcomes are fairly high level and therefore this is vague. The context of NPF4 is more progressive than the legislation itself and so we consider that there is a potential to end up with conflicting policies. We suggest that stronger reference sustainable development and the national outcomes within the document would assist in this regard.

### **Please provide your views on the incorporation of the Scottish Planning Policy and coherence of the NPF4 document overall as a roadmap.**

While we consider that the document is clear around the policies to be included in development plans themselves, greater clarity is required as to the status of the various aspects of NPF4 in terms of forming part of the Development Plan for decision making. It is not clear if it is the intention that only Part 3 on National Planning Policy requires to be complied with in this regard. We suggest that guidance may be needed around how the policies set out in Part 3 are to be interpreted and included in the Local Development Plan (LDP).

## **Part 1 – A National Spatial Strategy for Scotland 2045**

### **What is your view on each of the following elements of the strategy?**

#### **What is your view on the Sustainable Places section?**

No comment.

#### **What is your view on the Liveable Places section?**

No comment.

#### **What is your view on the Productive Places section?**

We question how the Productive Places strategy translates into the policies required to deliver it.

#### **What is your view on the Distinctive Places section?**

Per our comment in relation to the Productive Places section, we question how the Distinctive Places strategy translates into the policies required to deliver it.

## **What is your view on the 'Spatial principles for Scotland 2045' section?**

The document is not clear as to the status to be given to the spatial principles in planning decision making.

While NPF4 acknowledges that a flexible approach will be needed, it is not clear how all of the policies will work in practice. For example, we question how the concept of 20-minute neighbourhoods is intended to work in rural parts of Scotland.

## **Do you have any other comments on the National Spatial Strategy outlined in NPF4?**

Reference is made in this section to “nature positive” however this is not defined in NPF4. We question the meaning and effect of this in absence of a biodiversity policy.

## **What is your view on the 'Action areas for Scotland 2045' section?**

In relation to the North East Transformation area, paragraph 10 lacks strong promotion and improvement of public transport to address high car ownership. Paragraph 12 appears to focus on the area as outward transport hub and does not address this matter.

It is not clear how Regional Developer contributions are proposed to function in the Central Urban Transformation area. Consideration is required as to whether this is competent within the current section 75 agreement framework.

In relation to the Central Urban Transformation area, we note that this is a fairly diverse area to apply one approach and consideration is likely to be required as to how to achieve this in practice.

## **Do you have any other comments on the Action areas for Scotland 2045 outlined in NPF4?**

No comment.

## **Part 2 – National Developments**

**Please provide your view on the developments listed as National Developments in the NPF4. Are these the right priorities? Please provide your views on each of the National Developments in the text boxes provided below.**

### **Central Scotland Green Network**

No comment.

### **National Walking, Cycling and Wheeling Network**

No comment.

## **Urban Mass/Rapid Transit Networks (Aberdeen, Edinburgh, Glasgow)**

No comment.

## **Urban, Sustainable Blue and Green drainage solutions**

We consider that the scope of this is unclear. It is not clear whether this national development is meant to apply to any form of major development that requires a drainage or water management solution.

## **Circular Economy Material Management Facilities**

No comment.

## **Digital Fibre Network**

No comment.

## **Island Hub for Net Zero**

No comment.

## **Industrial Green Transition Zones**

No comment.

## **Pumped Hydro Storage**

No comment.

## **Hunterston Strategic Asset**

No comment.

## **Chapelcross Power Station Redevelopment**

No comment.

## **Strategic Renewable Electricity Generation and Transmission Infrastructure**

No comment.

## **High Speed Rail**

No comment.

## Clyde Mission

We consider that the location for when major applications become national development appears ill defined under the document as it stands: “The river and land immediately next to it (up to around 500 metres from the river) along its length.” This is likely to lead to conflict on when an application should have been defined as national development. We suggest that this could be resolved by the revised wording emphasised in the following: “The river and land immediately next to it (**where any part of an application site is within 500 metres from the river**) along its length.”

## Aberdeen Harbour

No comment.

## Dundee Waterfront

No comment.

## Edinburgh Waterfront

We consider that the location for when major applications become national development appears to be ill defined, with the document referring to “Edinburgh, initial focus on Leith to Granton”. The intended extent of Leith and Granton would be better expressed via a map or plan.

We consider that greater clarity in the wording is required including a more precise geographical location. For example, what does ‘initial focus’ mean? Does this reference the focus of investment or set a limit in scope of when applications become national development? It is not clear whether it is intended that during the lifetime of NPF4, this policy is to begin applying to all of Edinburgh or to all of ‘Edinburgh Waterfront’. As drafted, this development could be interpreted as meaning that any major development in Edinburgh constitutes national development which we do not expect was what was intended.

## Stranraer Gateway

No comment.

## **Please provide any other comments on the National Developments section of the NPF4?**

We note that based on the information available within the draft NPF4 and attachments, the assessment of the various candidate sites appears somewhat cursory, and it is not clear whether there is a robust evidence-base for assessing the sites. While there is some commentary in the document around why new sites have been added, for example, relating to the climate crisis, justification for individual decisions is lacking to some extent. There is a differing approach in some cases between the approach being taken here and previously (for example, Ravenscraig was previously given great significance but now has a lesser focus) and so clear justification for this would be of benefit. We note that airport enhancements and Grangemouth which were previously national development have been deleted. Some justification for this would be appropriate.

In addition, it is not clear how some of the national developments are intended to be delivered, for example, those focussing on green sustainability. The nature of these makes them unlikely to be delivered entirely on a private basis, but the Scottish Government appears to consider them key to achieving the net zero vision.

Where a National Development has a locational component (e.g. 500 metres from the river-Clyde Mission) what happens if only part of a development which otherwise qualifies falls within that locational requirement? Is that development national development or part national development and if so how does NPF4 apply to the decision-making?

We consider that the document could more clearly set out how national developments might interact with regional spatial strategies and with the 'action areas' identified in part 1 of the draft NPF4.

### Part 3 – National Planning Policy

National Planning Policy in the NPF4 sets out policies that will apply across Scotland other than where these need to be adjusted to meet local requirements. While we welcome this proposal, it is important to recognise that these will form the central plank of policies against which a proposal will be consented or refused including what conditions are to be attached. They are therefore matters of the first importance in the planning system. While interpretation of policy is ultimately a matter for the courts, it is vitally important that these policies are clear-cut, and their meaning is fully understood. Some of the policies relate to development planning and as such, it would be helpful if the document stated that they are not to be used for decisions on applications. This might seem an obvious point, but we consider a clear statement is needed for the sake of clarity and certainty.

We consider that there is a potential for conflict between the policies set out in NPF4 and those within existing LDPs or what may be emerging in LDPs, when under the Town and Country Planning (Scotland) Act 1997, the later policy will prevail in terms of primacy. If a latter LDP trumps the national planning policy, this has the potential to undermine the approach. We expect that the 'gate-check' process and LDP inquiry will have a key role to play in this going forward. We note that the Scottish Government has launched a consultation on *Local development planning - regulations and guidance*<sup>2</sup>. We suggest that this may seek to address some of the potential transitional issues.

Some policies are entirely new and arise from new priorities such as the climate crisis and community wealth building. Others have had only minor changes made to their previous iteration in SPP 2014, while others have been changed considerably or have been significantly expanded. We question to what extent the policies have been 'stress-tested', particularly against the background that a number of existing policies have developed (and are well understood) over a period of a number of years. While we recognise that there is an impact assessment available, this covers matters at a fairly high-level and in line with statutory requirements. For example, policy 5 focusses on community wealth building which is a new policy. It is not clear how this will

<sup>2</sup> <https://consult.gov.scot/planning-architecture/local-development-planning/>



work in a planning context or how this sits with existing duties on planning authorities for sustainable economic development. The concept itself does not seem to be defined within draft NPF4 and there is the potential to create uncertainty in the system given the lack of clarity.

The policies appear to require a number of additional assessments to be undertaken as part of assessing planning applications. This is potentially fairly burdensome, with burdens resting on planning authorities and/or development itself. The extent to which additional content in the consideration of planning applications is expected is unclear.

Greater clarity and certainty around the wording used in the policies would be beneficial. For example, a number of the policies refer to development being “supported” or “not supported” but the meaning of this is unclear. Does this mean that development is to be approved or not to be approved? It is important that there is strong degree of consistency across the policies. At present, Scottish Planning Policy has a ‘right development in the right place’ basis, however, this is not reflected in these policies.

As indicated above, the presumption in favour of sustainable development may have been retained across the breadth of NPF4 but we consider there is merit in including a specific presumption in favour of sustainable development. The existing presumption in SPP was considered by some to be unwieldy and containing too many factors. Some consideration should be given to examining how the English NPF incorporates the presumption in a more simplified way by reference to three overarching objectives as follows:

- a) an economic objective
- b) a social objective and;
- c) an environmental objective

The policies here differ from what has gone before and the application of national policies across Scotland is likely to be challenging. While NPF4 contains ambitious and laudable principles, it is difficult to see how these can be implemented in practice across the five different geographical areas and the document lacks in detail as to how many aspects will be achieved in practice. The policies are varying in their breadth and depth, and therefore appear to have differing scope for diversion at a local level. It would be helpful if the document was more explicit about the circumstances in which local diversion from the policies may be appropriate and the extent to which that may be appropriate. Specific policies do not always appear to align with the more general statements within NPF4.

We note that it is stated on page 61 that “The following Universal Policies should apply to all planning decisions”, however this conflicts with the policies themselves on multiple occasions. It may be helpful to split policies into those requiring to be addressed in LDPs and those that require to be considered in each application.

There is a clear need for cross-consistency within the NPF and there are some issues within the policies around the internal consistency of the contents of the document itself. For example, policy 30, part (c) on greenfield developments cuts across other aspects of the document and it is not clear how a decision-maker is supposed to grapple with this.



It is also notable that there are no development plan or development management policies on some of the matters of importance to the national economy including the role of air travel, oil and gas and the transition from fossil fuels, or nuclear energy proposals. We suggest that consideration of these matters in national policies should be considered.

**Please provide your view on the policies under each policy area. Are these the right priorities? Please provide your views on each of the National Planning Policies in the text boxes provided below.**

### **Policy 1: Plan-led approach to sustainable development**

The intention of this policy seems to be that it only applies to the creation of development plans and not decision making on individual applications. This appears contradictory to the statement at page 61 of the NPF4 that “The following Universal Policies should apply to all planning decisions”.

### **Policy 2: Climate emergency**

We suggest that some explanation of what “significant weight” and “significant emissions” mean in practice should be provided.

### **Policy 3: Nature crisis**

Some explanation within the policy as to the ‘nature crisis’ and its justification would assist users of the NPF4.

The policy uses the expression “**should** facilitate” (our emphasis) biodiversity is ambiguous. Does that mean this policy must be complied with? In terms of securing positive effects for biodiversity, we question whether this policy may be more explicit in allowing ‘offsite’ enhancement where a particular proposal cannot in terms of its development footprint deliver such effects.

We note that this policy applies in relation to development planning and development management.

### **Policy 4: Human rights and equality**

We consider that it is unclear what is required for applications to comply with this policy. The interplay with existing legal duties under the Town and Country Planning (Scotland) Act 1997, Human Rights Act 1998 and the Public Sector Equality duty are unclear.

This uses the expression “**should** respect” (our emphasis) which we consider is ambiguous. Does that mean this policy must be complied with?

The document does not state whether this policy applies to development planning and development management or both and clarity in this regard is needed.

## Policy 5: Community wealth building

This uses the expression “**should** address Community Wealth Building” (our emphasis). Does that mean this policy must be complied with?

This policy refers to the “Development Plan” although it appears that this should in fact be a reference to “Local Development Plan”. This seems to be correctly stated elsewhere in the document.

## Policy 6: Design, quality and place

The policy uses the expression “**should** be designed to a high quality” (our emphasis) and thereafter the word “should” is referred to in terms of compliance. Does that mean this policy must be complied with?

## Policy 7: Local living

This uses the expression “**should** support” (our emphasis). Does that mean this policy must be complied with?

## Policy 8: Infrastructure First

The policy uses the expression “should”. Does that mean this policy must be complied with?

We consider that this policy lacks clarity as it does not clearly set out how the various component parts work together or what the mechanism for delivering infrastructure will be. For example, it is not clear whether it is envisaged that section 75 agreements are to be used to deliver infrastructure across Scotland.

We consider that it is important for the policy to describe the continued role of section of 75 Agreements in infrastructure delivery and possibly to set out the Scottish Government’s position on the possible introduction of the Infrastructure Levy.

We suggest that there would be merit in Section 75 Agreements and related agreements having their own policy.

Given the potential for infrastructure to span across more than one planning authority, it would seem appropriate for reference to be made in this policy to the use of regional spatial strategies.

## Policy 9: Quality homes

This uses the expression “should”. Does that mean this policy must be complied with?

We consider that the detail contained within items a) – j) of this policy are fairly major policies in and of themselves on the broad topic of homes. It may be clearer to separate these components into separate policies.

The Town and Country Planning (Scotland) Act 1997 as amended places an obligation on Scottish Ministers to include a statement in the National Planning Framework about how they consider that development will

meet the outcomes listed in section 3A(3A) including the housing needs of older people and disabled people. In addition, section 3CD of the Act places a duty on Ministers to report to Parliament every two years on how the planning system is operating the meet the housing needs of older and disabled people and contains a requirement for local development plans to address the housing needs of the population of the area and the availability of land for housing, including for older people and disabled people (section 15). We consider that there is insufficient content within the draft NPF4 as to housing needs in order for these requirements to be met.

We suggest that Policy 9 should clearly set out the needs in terms of housing, both in terms of quality and quantity, and how these needs should be met at local level. As it stands, and in conjunction with the content in Annex A, we do not consider that the contents of NPF4 are sufficient to meet the specific requirements of the Act on these matters. This also gives rise to concerns as how NPF4 and in turn, development, will contribute to the outcomes of improving health and wellbeing and improving equality.

### **Policy 10: Sustainable transport**

This uses the expression “**should** need to be” (our emphasis). Does that mean this policy must be complied with?

### **Policy 11: Heat and cooling**

This uses the expression “should”. Does that mean this policy must be complied with?

### **Policy 12: Blue and green infrastructure, play and sport**

This uses the expression “should”. Does that mean this policy must be complied with?

### **Policy 13: Sustainable flood risk and water management**

This uses the expression “should”. Does that mean this policy must be complied with?

We question how compliance with this policy is to be demonstrated – for example, can all aspects of the policy be assessed and addressed in a flood risk report or similar, or is something more required?

### **Policies 14: Health and Wellbeing**

This uses the expression “should”. Does that mean this policy must be complied with?

We suggest consideration is given to whether the meaning of “health impact assessment” is clear. That could be explained in the glossary.

### **Policies 15: Safety**

This uses the expression “should”. Does that mean this policy must be complied with?

## **Policy 16: Land and premises for business and employment**

This uses the expression “should”. Does that mean this policy must be complied with?

Home working has been a mainstay for office work in the last 18 months. We consider the policies on home working should provide greater direction for this method of working beyond the Covid-19 pandemic.

## **Policy 17: Sustainable tourism**

This uses the expression “should”. Does that mean this policy must be complied with?

Due to the current and ongoing uncertainty on when the use of residential properties for short-term letting (outwith short-term let control areas) becomes a material change of use, we consider that it would be very helpful and is important for the Scottish Government to provide clear policy advice around short-term letting, for example, by setting the number of days which a property could be let for without there being a material change of use. This is causing great uncertainty, particularly in areas such as Edinburgh and Glasgow, leaving planning authorities to carry out their own amenity impact assessment on a case-by-case basis and to decide as a matter of fact and degree whether a material change of use has occurred. We consider that it is essential that the NPF4 grapples with this issue and provides a policy direction for the whole of the country.

In Greater London under the Deregulation Act 2015, no subjective planning assessment is needed, and a material change in use is held to occur if the property is let for short-term letting for a total of 90 days in any calendar year.

In relation to part e) on short term holiday letting, we question if the loss of residential accommodation is valid for the whole of Scotland, rather than being a matter for LDPs to cover as appropriate to the relevant area. In addition, it is unclear how this policy addresses the net zero target.

## **Policy 18: Culture and creativity**

This uses the expression “should”. Does that mean this policy must be complied with?

## **Policy 19: Green energy**

This uses the expression “should”. Does that mean this policy must be complied with?

We consider that greater clarity is required in this policy. For example, in relation to the reference to ‘unacceptable impacts’ in part d), it is not clear what those impacts might be and threshold for them being ‘unacceptable’. Clear criteria should be set out so as to create a degree of consistency and certainty for all those involved.

Under part g) some explanation as to why areas identified for windfarms should be suitable for use in perpetuity, yet consents may be time limited.

## **Policy 20: Zero waste**

This uses the expression “should”. Does that mean this policy must be complied with?

We consider that the requirements for compliance with this policy are unclear as the policy is ambiguous and appears very flexible and would not appear to point towards achieving “zero waste” if that is the intended policy. It would be helpful if the policy contained proposals setting out how compliance is to be demonstrated, such as some form of expert report.

In particular, the criteria at part i) is that applications for energy from waste developments “should supply a decarbonisation strategy aligned with Scottish Government decarbonisation goals and be refused where the strategy is insufficient”. NPF4 does not provide guidance as to how such a strategy should be prepared, what it is to cover or the basis for a decision maker judging whether the strategy is “sufficient”. It is somewhat surprising that such detail is not provided given that the decarbonisation strategy appears to be of such importance that failure to provide a sufficient strategy would result in refusal of the application. In this regard, an application may be compliant with all other policies in the NPF but fail to meet this particular criteria and so would have to be refused - we do not consider this proportionate, particularly given the lack of detail provided in the policy.

## **Policy 21: Aquaculture**

This uses the expression “should”. Does that mean this policy must be complied with?

We would question why part c) only gives protection to migratory fish on the north and east coasts of mainland Scotland?

Should the policy supporting aquaculture include a time limit for development proposals?

It is unclear if the Nature Crisis policy also applies to aquaculture.

## **Policy 22: Minerals**

This uses the expressions “should” and “does not support”. Does that mean this policy must be complied with?

In part d) a description of “sustainable” extraction of aggregates would be merited.

## **Policy 23: Digital infrastructure**

This uses the expression “should”. Does that mean this policy must be complied with?

We consider that part e) on the operation of existing digital infrastructure has the potential to blight sites that have already been allocated for development in a local development plan (but not yet consented) and this may therefore require careful consideration.

## **Policies 24 to 27: Distinctive places**

These policies use the expression “should”. Does that mean this policy must be complied with?

In terms of retail, we consider there is a policy gap in relation to online shopping which has grown significantly. Clearly this impacts on in-store shopping and the NPF does not explain how this should be managed in planning terms. Online shopping has a dependency on its delivery mechanisms and distribution centres.

## **Policy 28: Historic assets and places**

This uses the expression “should”. Does that mean this policy must be complied with?

It is unclear from the current drafting of the policy that the distinct legal tests for Listed Buildings and Conservation Areas and Schedule Monuments have been understood in the statement. Separate legal tests require to be considered in this regard, and so this is not only a matter of development plan compliance.

## **Policy 29: Urban edges and the green belt**

This uses the expression “should”. Does that mean this policy must be complied with?

It is unclear if this policy means that a special case must be made for the use of green belts.

## **Policy 30: Vacant and derelict land**

This uses the expression “should”. Does that mean this policy must be complied with?

Repurposing redundant buildings, although a laudable objective, would merit greater detail in this policy.

## **Policy 31: Rural places**

This uses the expression “should”. Does that mean this policy must be complied with?

## **Policy 32: Natural places**

This uses the expression “should”. Does that mean this policy must be complied with?

In relation to part i) concerning wild land, it is unclear how the policy to prevent development in wild land sits with policy 19 concerning windfarms.

## **Policy 33: Peat and carbon rich soils**

This uses the expression “should”. Does that mean this policy must be complied with?

## **Policy 34: Trees, woodland and forestry**

This uses the expression “should”. Does that mean this policy must be complied with?

While this policy addresses preservation of woodlands, we consider that it does not address the urban context of preserving and including additional trees in new development to support the move to net zero. This would appear to be inconsistent with the stated goal of the policy.

## **Policy 35: Coasts**

This uses the expression “should”. Does that mean this policy must be complied with?

We consider that point e) would merit greater clarity in relation to how it is currently framed and how it interacts with the rest of the policy. For example:

- 1) We consider that reference to applications that “may impact on the coast” is vague and we consider could result in dispute over whether Policy 35(e) applies to an application. Other parts of Policy 35 use the apparently narrower terminology of applications in a “coastal location” which seems clearer. If the intention is that policy 35(e) only applies to those same types of applications, then we suggest that consistent terminology with the rest of policy 35 should be used.
- 2) Point e) states “it should address any appropriate issues” – we consider that this is vague, ill-defined and may lead to disputes over whether this development plan policy has been met. It would be clearer if the policy included a list of matters to address, where they apply to the proposed development. Alternatively, point e) could cross refer to the rest of policy 35 in terms of the matters that are expected to be addressed.
- 3) We consider that it is unclear from NPF4 itself how it is intended that policy 35(e) be met. Is it expected to be a requirement to include some form of assessment of the coastal issues in the design statement, with the policy requirements of what will be acceptable development being addressed in the rest of policy 35? If this is the intention, then point 1) above is relevant given the requirement to address coastal issues in the design statement seems to be for a wider range of applications than is covered by the rest of policy 35. In such applications, the design statement may identify potentially unacceptable coastal issues, without them technically constituting a breach of the rest of policy 35 due to it being more narrowly framed.

## **Part 4 – Delivering Our Spatial Strategy**

### **Please provide your views on the Scottish Government’s proposals for delivering NPF4.**

We consider that the Spatial Strategy is a critical component of NPF4 but as it stands, lacks detail. We consider that it would be helpful to have some explanation as to how the various components of the development plan would interact with the content of the NPF. There is a potential tension as to whether planning authorities will want to adopt the policies in full or may wish to adapt them for the circumstances



within their local area. The extent to which planning authorities will have freedom to adapt the policies is unclear.

**Please provide your views on each of the key delivery mechanisms in the text boxes provided below.**

### **Aligning Resources**

No comment.

### **Infrastructure First**

No comment.

### **Delivery of National Developments**

No comment.

### **Development Plan Policy and Regional Spatial Strategies**

It would be helpful if NPF4 clearly set out the extent to which regional spatial strategies have to align with the NPF.

### **Monitoring**

No comment.

## **Part 5 - Annexes**

### **Please provide your views on Annex A: Outcomes Statement.**

In relation to point a) concerning housing needs, please see our comments above in connection with Policy 9. While we note that Policy 9 is referred to within the Outcomes Statement, that policy is vague in terms of what is required as it does not cover all housing nor specify defined housing needs, including for older people and disabled people.

### **Please provide your views on Annex B: Housing Numbers.**

We wonder if there is a possibility to keep the Minimum All-Tenure Housing Land Requirement (MATHLR) under review more frequently than at 10-year intervals. Accurately predicting the MATHLR 10 years hence appears unrealistic. In addition, there are potentially significant knock-on effects for preparing an LDP in 9 years hence, as an LDP in this situation will likely almost immediately not be providing sufficient housing by the time NPF5 is prepared.

## **Any other comments on the NPF4 Draft**

### **Do you have anything else to add in relation to the draft of the National Planning Framework (NPF4)?**

We note that while the Glossary is a useful addition, it is incomplete and would merit the inclusion of other definitions.

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