

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

Reference should be made to (Local) Noise Action Plans in terms of the Environmental Noise Directive

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?:

No comment

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?:

No comment

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? :

Terminology with regard to noise an space ports should be kept consistent with other sources of noise

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?:

No comment

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

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

No comment

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?:

No comment

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?:

No comment

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? :

No comment

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

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

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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? :

No comment

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

Do you agree with this policy approach?:

No comment

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? :

No comment

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? :

No comment

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?:

No comment

27 Policy 5: Community wealth building. Do 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?:

No comment

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 Institute of Acoustics agrees that the policy will enable the planning system to promote design, quality and place, but suggests that the word "detrimental" is a subjective term and consideration should be given to using terminology such as reduction of "adverse impact".

The Institute of Acoustics also notes that although noise is mentioned on a number of occasions through out the document "vibration" is only mentioned with reference to minerals. Vibration should be considered along with noise for all relevant noise/vibration generating development or noise/vibration sensitive development.

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? :

No comment

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?:

There is no mention of noise in this policy. The Institute of Acoustics considers that noise should be mentioned here as otherwise it is inconsistent with other parts of the document (such as mineral extraction, green energy and cultural venues) where it is mentioned as a consideration.

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?:

Noise including the possible impact on surrounding existing sites (potential for Agent of Change) should be a consideration in the formulation of local development plans.

Noise Sensitive Development and Noise Generating Development is the terminology of the PAN 1/2011 and should be adopted here where relevant.

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?:

No comment

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? :

There is a noise impact related to heating and cooling which is not mentioned here. There are noise impacts from both active and passive systems. The policy stresses that passive cooling systems are preferred but this would often be at odds with the noise environment and subsequent adverse impacts on health and wellbeing. There is often a choice to be made between acceptable noise and passive cooling, and there is no adopted position here on hierarchy.

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?:

The Institute of Acoustics suggest including that blue / green areas can provide soundscape advantages as well as simply having the potential to reduce noise levels.

An emphasis should be put on the promotion of sound as a positive resource for health and wellbeing rather than just problem to address here.

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?:

No comment

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?:

The Institute of Acoustics would like to see an emphasis on the promotion of sound as a positive resource for health and wellbeing rather than just problem to address here.

PAN 1/2011 uses the terminology, "significant adverse impact from noise". For consistency the IoA suggest that the sentence, "Development proposals that would result in unacceptable levels of noise will not be supported" is changed to be consistent with PAN, i.e. "Development proposals that would result in a significant adverse impact from noise will not be supported". Significant adverse impact is more definable than unacceptable.

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?:

There is no mention of noise in this policy. The Institute of Acoustics considers that noise should be mentioned here as otherwise it is inconsistent with other parts of the document (such as mineral extraction, green energy and cultural venues) where it is mentioned as a consideration.

Agent of Change is as relevant here as it is for cultural venues and should be mentioned.

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?:

No comment

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?:

Agent of Change principal applies across many sectors not only culture. However, the Institute of Acoustics thinks that this principal should be taken in to consideration at the strategic area development plan stage, with zoning taking consideration of existing businesses.

40 Policy 19: Green energy. 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?

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?:

Consideration of noise with regard to micro generation, heating and cooling is important here. Particularly where there is permitted development. Adherence to planning does not give immunity to nuisance.

In addition the Institute of Acoustics thinks that the underwater noise environment should be considered here.

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?:

Yes.

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?:

Yes. Consideration of noise should be included to marine underwater 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?:

The Institute of Acoustics considers that the assessment of Noise Sensitive Receivers near mineral workings should consider health and well being

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?:

No comment

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?:

The Institute of Acoustics notes that Quiet Areas in agglomerations are not mentioned anywhere in the document. These have been adopted (under Environmental Noise (Scotland) Regulations 2006) by some local authorities.

It is also noted that Strategic Noise Mapping was undertaken partly to identify these areas and that the mapping sites are not being maintained for strategic use <https://noise.environment.gov.scot/>

Noise is not mentioned here for Town Centre Living. Many activities or developments in the town centre (noise generating or noise sensitive) will require a noise assessment. Consideration should be given here that a drive for town centre living is likely to result in compromises in other objectives. Agent of Change will also be relevant for many developments in the town centre.

46 Policy 28: Historic assets and places Do 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? :

No comment

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?:

The Institute of Acoustics notes that (Local) Noise Action Plans in terms of the Environmental Noise Directive do not seem to be mentioned within the document text. Outcomes of strategic noise mapping relevant here.

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?:

Yes, however, the implications of re-use in terms of Agent of Change for surrounding land uses must be considered in the formulation of the local development plans

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? :

Yes, however the Institute of Acoustics suggest that the positive aspects of sound should be mentioned

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?:

The Institute of Acoustics would like to see an emphasis of on the promotion of sound as a positive resource for health and wellbeing rather than just problem to address here.

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? :

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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? :

No comment

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?:

No comment

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?:

No comment

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? :

The Institute of Acoustics notes there are numerous references to nuisance: "reduce levels of nuisance, e.g. noise...".

We recommend that the term "Nuisance" be replaced with "adverse impact". Nuisance has a legal terminology which is not part of the NPF4, the aim is to reduce adverse impact of noise.

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.:

Under, Walking, Cycling and Wheeling Network the text states that, "Additionally, a number of reviews have suggested that people in deprived communities tend to be exposed to higher levels of air and noise pollution compared to those in less deprived areas". The text references a Public Health Scotland review that fed into NPF4. The noise aspect of this statement is not fully justified by current research. We would suggest the following change, "Additionally, a number of reviews have suggested that people in deprived communities can be more likely to be exposed to higher levels of air and noise pollution compared to those in less deprived areas."

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?:

The text relating to 'Policy 10 – Sustainable Transport' there is no mention of 'noise' and reference is made to DMRB

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?:

It is noted that Electric vehicle network : States electric vehicles are quieter. It is recommended this statement is changed to "electric vehicles are quieter when travelling at low speeds" or similar. Moving to electric vehicles will not solve noise problems adjacent to higher speed roads where tyre noise dominates

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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?:

No comment

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? :

No comment

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Institute of Acoustics

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?:

Slightly satisfied

Please enter comments here.:

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

Slightly satisfied

Please enter comments here.: