

Report

Report to:	Planning Committee
Date of Meeting:	26 January 2021
Report by:	Executive Director (Community and Enterprise Resources)

Subject	Scottish Government Consultation on Scotland's Fourth National Planning Framework Position Statement and Update on the Reform of Scotland's Planning System
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1. Purpose of Report

1.1 The purpose of the report is to:-

- ◆ advise members on the Scottish Government consultation on Scotland's Fourth National Planning Framework Position Statement and provide an update on other activities being carried out by the Scottish Government in relation to the continuing wider reform of Scotland's planning system
- ◆ seek approval of the Council's response to the consultation

2. Recommendation(s)

2.1 The Committee is asked to approve the following recommendation(s):-

- (1) that the activities being carried out by the Scottish Government as part of the reform of the planning system be noted;
- (2) that the wording contained in the appendix to this report is submitted as the Council's response to the Scottish Government's consultation on Scotland's Fourth National Planning Framework Position Statement; and
- (3) that the Head of Planning and Economic Development Services be authorised to make any drafting and technical changes to the response prior to its submission.

3. Background

3.1 The Planning (Scotland) Act 2019 received Royal Assent in July 2019. During consultation on the likely provisions of the Act, the Scottish Government highlighted that it sees the planning system as being central to support the objective of creating a more successful country with opportunities for all to flourish through increased wellbeing and sustainable and inclusive economic growth. The planning system has a key role in achieving this goal and the new legislation puts in place a range of new statutory duties and measures to make it more efficient and effective and to ensure it is capable of providing a high quality service.

3.2 At the moment, national planning policy prepared by the Scottish Government includes the National Planning Framework (NPF), currently in its third iteration, which sets the long-term spatial strategy for Scotland and Scottish Planning Policy (SPP) which contains more detailed policy on a wide range of land use planning matters. The Act now incorporates these two documents into a single National Planning Framework which when approved will become part of the Development Plan used for making

decisions on planning applications alongside the Council's Local Development Plan. At the same time, the need to prepare a Strategic Development Plan (currently Clydeplan which covers the Glasgow City Region) has been removed and in its place there is a statutory duty to prepare Regional Spatial Strategies (RSS). However, the RSS will not form part of the Development Plan.

3.3 The work programme produced by the Government following the 2019 Act envisaged a draft NPF4 being laid before the Scottish Parliament in September 2020 with consultation being carried out thereafter. However, this timescale has been delayed by Covid-19 and it is now intended that the draft NPF4 will be laid in the Scottish Parliament in autumn 2021 with extensive public consultation and stakeholder engagement carried out at the same time. It is anticipated that NPF4 will be approved in mid 2022. As an interim measure, the Scottish Government published, on 26 November 2020, a Position Statement on NPF4 which sets out its current thinking. It incorporates a wide range of evidence that was submitted during the Call for Ideas exercise and early engagement activity carried out in early 2020 and which the Council made a contribution towards. The Position Statement is not a formal part of the NPF process; nor is it a draft NPF4 and it does not have any formal status in the planning process.

3.4 At the same time a range of other planning reform activity has been progressed by the Scottish Government over the last 12 months and this is described in section 5 of the report together with other changes to the planning system that are expected to be brought forward in the coming year.

4. NPF4 Position Statement

4.1 The position statement describes NPF4 as 'a new spatial plan for Scotland that will look ahead to 2050 to set out where future development can bring benefits for people, the economy and environment'. Two central themes run through the document. Firstly, in order to achieve the Scottish Government target of net-zero emissions by 2045, there will be a need for the planning system to be 'rebalanced' so that climate change will be an overarching priority for the spatial strategy and a guiding principle for all plans and decisions. Secondly, that the quality of our places matter. Place is where people, location and resources come together to create a sense of identity and purpose and is at the heart of addressing the needs and realising the full potential of communities. The Place Principle sits at the heart of this and requires organisations and local communities to work together to improve the lives of people, support inclusive and sustainable economic growth and create more successful places.

The document also makes strong reference to the lessons learned from Covid-19, particularly in terms of the impact on the economy and local communities together with the isolation felt by many due to too few accessible local amenities and green spaces. Overall, the Position Statement makes clear that it is not intended to restrict development but rather to help stimulate the green economy and encourage localism by encouraging innovation, greener design and place-based solutions.

As a result, NPF4 is expected to focus on achieving the four key outcomes described in 4.2 to 4.5 below and the following sections summarise the Government's thinking on these themes. It should be noted that the detailed strategy and policy approach will become clearer once the draft NPF4 is produced for consultation later this year. The Position Statement provides an opportunity for stakeholders to provide comments on its contents and the Council's proposed feedback is set out in the appendix to this report.

4.2 Net-Zero Emissions

4.2.1 Prioritising emissions reductions

The position statement highlights that an urgent and radical shift in planning policy is required to achieve the net-zero emissions target by 2045. A Land Use Strategy will be developed to guide long term land use so that it reverses patterns of behaviour that currently contribute to emissions. The transition from an energy intensive to zero carbon economy is the goal. Support will be strengthened in terms of retaining and re-using existing buildings. It will be made more difficult for new developments that generate significant emissions to gain planning permission.

4.2.2 Integrating land use and transport

Policy will seek to promote high quality walking and cycling, public transport and shared transport options as opposed to single occupancy car use. As a result, development should be directed towards locations which reduce the need to travel or are served by sustainable transport options. In addition, ultra-low emission vehicles including electric vehicles will have an important role to play and, therefore, NPF4 will include policy on electric vehicle infrastructure.

4.2.3 Design solutions and innovation

A reduction in emissions from new buildings is identified as a key driver of national planning policy and this will be supported through what is termed a whole building approach by facilitating low carbon methods of construction; encouraging the use of low energy and emissions materials and natural and micro-climate features; and enabling the use of renewable and zero emissions heating. The retrofitting of existing buildings will also be important.

4.2.4 Nature-based solutions

The natural environment will play a vital role in removing carbon from the atmosphere and securing it in natural habitats including bogs and peatland. In addition, nature-based solutions such as woodland creation and peatland protection will be important in reducing emissions. Policies designed to protect and restore biodiversity and natural assets will be strengthened particularly in terms of improving their long-term resilience to climate change.

4.2.5 Delivery of infrastructure to reduce emissions

The Position Statement states that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments. It identifies new technologies that will be supported including carbon capture and storage; hydrogen; and the decarbonisation of heating, public transport and vehicle fleets. A priority will be the roll-out of renewable electricity and renewable and zero emissions heat technology.

4.3 Resilient Communities

4.3.1 20 minute neighbourhoods

This concept is based on peoples' main needs being met within a 20 minute walk of their home resulting in a focus on neighbourhoods and local living. The outcomes will include a reduction in emissions, an improvement in health and wellbeing and reduction in inequality, achieved through the application of the Place Principle and building quality places that work for everyone.

4.3.2 Promoting inclusion and eliminating discrimination

This reflects the Government's commitment to promoting equality, tackling discrimination and fostering good relations between people and ensuring every person and community achieves their full potential. This is to be achieved by encouraging more people to get involved in planning through greater community engagement and

the ability for communities to prepare Local Place Plans (see 5.7 below). The use and development of future places and spaces will be considered in terms of gender, ethnicity, age and disability.

4.3.3 Improving health and wellbeing

NPF4 is to be designed to support health and wellbeing and address health inequalities as a result of, for example, poor diet and obesity and noise and air pollution. Policy direction will include increasing active travel; improving air quality; and improving childhood experiences. The approach will look at how the built environment can improve public health and measures to improve health will be a requirement of the development process, for example, through high quality design, the provision of blue and green infrastructure and access to quality greenspace. Reference is made to the introduction of a policy principle that puts the needs of people and their health at the heart of the planning system.

4.3.4 Delivery of good quality homes

The spatial strategy will focus on delivering a wide range of good quality, energy efficient and zero carbon homes in the right places to meet the needs of a changing population. This will include making best use of existing and planned housing stock to enable people to stay in their homes as long as possible. Long term changes include sustainable rural living; prioritising sustainable locations and vacant, derelict and brownfield land; the redevelopment of existing buildings; town centre regeneration; and more people working remotely or more locally in the future.

4.3.5 Infrastructure-first approach to community development

This relates to the need for services and facilities (eg health, transport, accommodation for the aging population, community growing and open spaces, education, water and drainage, digital and retail) to be easily and affordably accessed. NPF4 will prioritise the infrastructure required to reduce the need to travel and cut emissions. The requirement for an evidence report as part of the preparation of a Local Development Plan (see 5.6 below) will help ensure appropriate infrastructure and services are in place to serve the needs of communities. At the same time, the enhancement and promotion of open space and green networks is an integral part of successful place-making and supporting health and wellbeing and reducing emissions. Blue and green infrastructure will be an integrated requirement for new development with the aim of building in long-term resilience to climate change.

4.4 A Wellbeing Economy

4.4.1 Supporting a sustainable and green economic recovery

This theme is identified as crucial to help the country recover from the impacts of Covid-19 by promoting strategic locations for future investment and business growth. The aim will be to achieve sustainable, inclusive growth by protecting and investing in natural assets and supporting the building of a wellbeing economy (where the general wellbeing of the population or quality of life is as important as financial success by giving equal importance to tackling inequality as economic competitiveness and making sure that work is fulfilling and well paid) as part of the transition to a net-zero circular economy. The scope for greater integration of work and living will be explored through, for example, the creation of community hubs and flexible workspaces and encouraging homeworking. This will be especially important in rural communities. Development that contributes to wellbeing and fair work will be explicitly supported.

4.4.2 Tourism has been significantly affected by Covid-19 and the focus of the strategy is recovery, investment and stimulating demand in this sector. Culture and the arts will also be supported in terms of regeneration and development and will ensure it is

embedded in all policies so that its transformative potential is realised. Examples include the temporary use of vacant spaces and animating public spaces.

4.4.3 Transition to a circular economy

Policies on zero waste are to be updated to ensure the planning system supports development which reflects the waste hierarchy, prioritises the reduction and re-use of materials and facilitates the delivery of new waste infrastructure. Minimising construction waste and promoting the sustainable re-use of the built environment, especially existing buildings, will have an important role in this. Developers will be encouraged to connect new buildings to existing heat networks.

4.4.4 Improving digital connectivity

The spatial strategy will reflect future investment in digital infrastructure including supporting the roll out of new infrastructure in order to maintain and grow communities in both urban and rural areas and unlock the potential of places and the economy. Stronger requirements for new housing and businesses to connect to existing and future digital infrastructure will be introduced.

4.5 **Better, greener spaces**

4.5.1 Focus on place based outcomes

The Place Principle and the Place Standard tool will be embedded within NPF4. The spatial strategy will focus on the qualities and character of our places to achieve the wider objectives of community resilience, inclusive growth and environmental sustainability. This will mean supporting existing successful places while seeking to improve those that do not contribute to these goals. Focus will be on regeneration so that disadvantaged and fragile communities will be prioritised for investment. In addition, actions to tackle climate change will focus on places so that climate vulnerable communities are prioritised by improving the resilience of infrastructure.

4.5.2 Higher quality design

NPF4 will promote the planning and development of healthier, inclusive, sustainable and well-designed places which in turn will improve people's health, wellbeing, the economy and environment. The public realm has an important part in creating better places and, therefore, the focus will be on the design, layout and accessibility of streets and spaces.

4.5.3 Re-imagining city and town centres

Town centres in South Lanarkshire are facing significant challenges which have intensified as a result of Covid-19. The new emphasis on localism and community empowerment will result in the need for a policy approach to aid the diversification of town centres and stimulate new investment. Changes to living and working patterns and the effects of climate change can help them evolve. Reference is made to providing more good quality homes in town centres with access to shops and services; this will help address climate change by reducing the need to travel while also supporting the evening economy. Policies will be aimed at delivering the Town Centres First Principle.

4.5.4 Re-use of vacant and derelict land and empty buildings

The position statement highlights this theme as having the potential to deliver significant benefits including sustainable, inclusive growth and reduced emissions. The policy framework will give confidence to communities and investors that vacant and derelict land is an opportunity to stimulate growth. A 'brownfield first' approach will be promoted ahead of greenfield sites.

4.5.5 Promote living and working in the rural area

The 2019 Act requires development plans to contribute to increasing the population of rural Scotland. Significant changes to support prosperous and sustainable communities and businesses will be developed with the ambition of building low carbon rural communities. This will include identifying infrastructure requirements and ensure access to goods, services, health and education in a low carbon way.

4.6 **Next Steps**

4.6.1 The Council has been given an opportunity to comment on the Position Statement and the proposed response is included as an appendix to this report. The document sets out, in a succinct way, the main outcomes the Scottish Government seeks to achieve through the planning system to 2050 and a long-term view is welcomed on matters including addressing climate change, tackling inequality and discrimination, securing a greener future and ensuring the priorities and opportunities for local communities are met. Delivery will result in emissions targets being met and fundamental changes to places in South Lanarkshire. Overall, it is considered that the document provides a strong policy direction that will enable the planning system to fully contribute to these themes.

4.6.2 The significant changes NPF4 will explore include:-

- ♦ stronger support for sustainable, low and zero carbon developments
- ♦ a renewed emphasis on design, quality and place
- ♦ support for development that reduces the need to travel in association with the concept of 20 minute neighbourhoods
- ♦ a shift in the way new housing is planned so that the diverse needs of the population are met while improving the quality of our places
- ♦ the promotion of an infrastructure-first approach to development at all scales
- ♦ ensuring places work for everyone and are greener and healthier
- ♦ enabling development and investment, including inward investment that improves our collective wellbeing and supports fair work
- ♦ new policies to address key economic sectors including food and drink; culture and the creative sectors and tourism
- ♦ reimagining our city and town centres as a place to live, work and enjoy
- ♦ prioritising development on vacant and derelict land
- ♦ support for development that improves the resilience and sustainability of the rural economy and communities
- ♦ improvements to biodiversity and the significant expansion of green infrastructure

There will be challenges around delivery of this ambitious programme. It will require a collaborative approach by all stakeholders in the planning system ranging from local communities to the development industry as well as statutory undertakers and Government agencies. In addition, other Council services will have a more direct and wider role than at present in terms of resources and developing plans and strategies.

4.6.3 As noted earlier, a draft NPF4 will be laid before the Scottish Parliament and published for consultation later in the year. It is intended that a report updating members and seeking approval for the Council's response to the spatial strategy and detailed policy will be brought to the Planning Committee at the appropriate time.

4.6.4 It is proposed that the Head of Planning and Economic Development Services be authorised to make any drafting and technical changes to the response prior to its submission.

5. Update on other Scottish Government Activity

- 5.1 Since the 2019 Act received Royal Assent, the Government has carried out a range of work related to the reform of the planning system. An update on these matters together with a summary of other activity expected to take place over the coming year is described below.

5.2 Response of the Planning System to Covid-19 and Economic Recovery

- 5.2.1 Emergency legislation was introduced in the early stages of Covid-19 which included extending the duration of planning permissions that were about to expire; enabling online publication of planning documents instead of at physical locations; and suspending the need for public events in pre-application and plan consultation, which can instead be held virtually. All of this legislation has been extended so that it can continue to be used while still needed. In addition, permitted development rights were introduced which temporarily grant planning permission for any necessary emergency healthcare-related facilities to deal with the current crisis until 1 July 2021.

- 5.2.2 In addition, guidance has been issued to allow for the reasonable temporary relaxation of planning controls particularly in terms of using discretion not to take enforcement action against planning breaches that are acceptable in the current circumstances. These include allowing the hospitality industry to provide outdoor seating and takeaway facilities; extending food retail opening times and deliveries outwith their conditioned hours; and longer hours of operation on construction sites.

5.3 Digital Strategy for Planning

- 5.3.1 On 24 November 2020 the Scottish Government launched Transforming Places Together: Scotland's Digital Strategy for Planning. It sets out a framework for a digital planning system with a series of key missions to deliver digital transformation of the planning system which is a key element of planning reform. In particular, it will focus on the potential to provide new ways to get people involved in planning and help them influence the future of their places. A 5-year programme which sets out the timetable and details of the strategy will be launched in the Spring.

5.4 Review of Permitted Development Rights

- 5.4.1 The Government carried out consultation on a first phase of new and amended permitted development rights whereby a range of development would no longer require planning permission. The proposed changes are linked to their potential to support Scotland's green recovery and remote and rural communities and focus on digital infrastructure, agricultural units, peatland restoration and development supporting active travel. On 18 December 2020, the Government laid an order in the Scottish Parliament including new and extended permitted development rights in relation to these matters. If approved, the Order will come into force on 1 April 2021. One important element will be the ability to change the use of an agricultural unit to either a dwellinghouse or commercial use without needing planning permission subject to a range of criteria and a prior approval process.

- 5.4.2 Consultation on a second phase of changes to permitted development rights will include support for town centres to recover, drawing from the current review of the Town Centre Action Plan.

5.5 Consultation on Planning Fees

- 5.5.1 Members will recall that a report was presented to the Planning Committee on 11 February 2020 seeking approval of the Council's response to a consultation by the Government on planning performance and fees. This would have resulted in significant increases in income received from fees for planning applications as well as the

introduction of a range of discretionary charges for activities such as pre-application discussions. It was intended that the proposed changes would be implemented in summer 2020, however, Covid-19 led to a review of the timing and a wider reprioritisation of the work programme. The Government recently advised that they will pick this up again when the timing is more appropriate. This is disappointing at a time when fee income from the submission of planning applications has not recovered to levels in previous years and the additional duties introduced as a result of the 2019 Act will require more resources if they are to be implemented effectively.

5.6 Local Development Plan Procedures

5.6.1 At the Planning Committee on 1 December 2020 members agreed to proceed to the adoption of the proposed South Lanarkshire Local Development Plan 2 with an anticipated timescale for the process to be complete in April 2021.

5.6.2 The 2019 Act increases the timescales for the replacement of Local Development Plans (LDPs) from every 5 years to 10 years. In addition, the new legislation introduces significant changes to the way in which they will be prepared. This includes the need to produce an evidence report at the start of the process and submit it to the Scottish Government as part of a 'gatecheck' process. Other changes include an increase in the number of matters that a LDP should address and extended consultation and community engagement requirements. Consultation on the associated regulations and guidance is expected to be published in the first quarter of 2021. Transitional guidance published by the Government in November 2020 anticipates that the regulations will come into force in spring/Summer 2022 in line with publication of NPF4 after which all planning authorities will have a new style LDP in place within 5 years. In the meantime, officers will be focussing on the delivery of LDP2 and will start preparatory work on the new Plan based on what is known at the moment. Members will be kept informed of this as the process evolves.

5.7 Local Place Plans

5.7.1 The 2019 Act introduces the ability of community bodies to prepare a Local Place Plan for the area. Consultation is due to be carried out in the first quarter of 2021 on the detailed arrangements and guidance with the documents in place by late 2021 ie before NPF4 and the LDP Regulations are published. This will allow these plans to be able to influence the first round of local LDPs in the new system. In advance of this, the Planning Service is developing a closer working partnership with the Council's Community Participation team.

5.8 Open Space Strategies

5.8.1 A further requirement of the 2019 Act is the preparation of an Open Space Strategy and an assessment of the sufficiency of play opportunities in the Council area for children. It is to set out a strategic framework of the planning authority's policies and proposals on the development, maintenance and use of green infrastructure in their area, including open spaces and green networks. Open spaces and opportunities for play are key components in placemaking by helping create pleasant, liveable, healthy and resilient communities. Consideration of open space, green infrastructure, and play opportunities also supports the Governments ambitions for 20 minute neighbourhoods. Consultation is expected to be carried out on the associated regulations and guidance in early 2021. In advance of this, a comprehensive audit of existing open space provision in South Lanarkshire in terms of quality, quantity and accessibility is currently being carried in tandem with the Council's Countryside and Greenspace team and the Glasgow and Clyde Valley Green Network Partnership and this will inform the development of the strategy.

6. Employee Implications

- 6.1 The Council's response to the consultation on the draft NPF4 later this year will be met through existing officer resources.

7. Financial Implications

- 7.1 None.

8. Climate Change, Sustainability and Environmental Implications

- 8.1 The Position Statement suggests that climate change will be a guiding principle for all plans and decisions and, therefore, it is clear that the planning system will have an increasingly key role in addressing the climate change agenda.

9. Other Implications

- 9.1 The Position Statement seeks stakeholders to submit their views on the document. There would be reputational risk if the Council did not respond.

10. Equality Impact Assessment and Consultation Arrangements

- 10.1 An Integrated Impact Assessment Update Report has been published alongside the Position Statement.
- 10.2 The proposed response in terms of the Scottish Government's consultation on Scotland's Fourth National Planning Framework Position Statement is attached as an appendix to the report and details of future consultation activity are provided in the report.

Michael McGlynn

Executive Director (Community and Enterprise Resources)

14 January 2021

Link(s) to Council Values/Ambitions/Objectives

- ◆ Demonstrating governance and accountability
- ◆ The efficient and effective use of resources and managing and improving performance

Previous References

- ◆ Planning Committee - 11 February 2020
- ◆ Planning Committee – 1 December 2020

List of Background Papers

- ◆ Planning (Scotland) Act 2019
- ◆ Scottish Government consultation on Scotland's Fourth National Planning Framework Position Statement

Contact for Further Information

If you would like to inspect the background papers or want further information, please contact:-

Tony Finn, Montrose House, 154 Montrose Crescent, Hamilton, ML3 6LB

Ext: 5105 (Tel: 01698 455105)

E-mail: tony.finn@souythlanarkshire.gov.uk

Scottish Government Consultation on Scotland's Fourth National Planning Framework

Position Statement

Appendix

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

The position statement makes the significant declaration at the start of the document that we cannot afford to compromise on climate change. Putting the planning system at the heart of tackling this global priority is a fundamental position that must be stated and reinforced at every opportunity. Indeed, addressing climate change and responding to the global climate emergency must be the starting point for all decision making on the future use of land. NPF4 should embed this overarching principle at the outset in its strategy and policy direction.

Each of the five themes within this outcome are important in their own right, however, there needs to be a joined up approach so that all actions and policies support the net-zero emissions targets. There also needs to be recognition that planning cannot address these issues in isolation but will need to work in tandem with other sectors and statutory bodies, and be explicitly linked to other legislation and policy, in order to achieve the net-zero target. Ensuring the planning system is fully aligned with the Building Regulations is one important example; consideration should be given to ensure there is not overlap/contradiction between the two regimes. In addition, policy needs to be flexible enough to accommodate the constantly evolving advances in technology and our understanding of the issues relating to climate change.

The 'whole building' approach is welcomed and will be a key element in reducing the demand for energy and resources throughout the development process and afterwards. To be worthwhile, high minimum standards should be set out in policy; it is not enough to rely on higher standards only where there is an appetite from developers. As an alternative, the use of offsetting targets by other means should be explored. The future management and maintenance of the design solutions should also form part of the outcome of the development process. The provision of district heating networks and/or heat pumps should be a pre-requisite for all new development depending on their scale and type.

The retrofitting of existing buildings is welcome in principle but it is not clear under what circumstances this will be required or how it could be enforced. The planning system can only implement such measures when planning permission is required which will limit opportunities. In addition, there should be recognition that older buildings will not necessarily lend themselves to new technology while intervention in listed buildings and conservation areas will need to be carefully controlled and considered.

In tandem with the role of the planning system, other key actors including developers, infrastructure providers and public organisations must understand and embrace the challenges and impacts of climate change. The benefits of climate resilient development should be recognised by developers and the costs factored into the viability of projects. In turn, a climate resilient development can be marketed as a strong selling point for their customers, for example, inward investors and potential purchasers of new homes.

In terms of the delivery of infrastructure to reduce emissions, South Lanarkshire has recently been involved with proposals to repower one of the first commercial windfarms in Scotland. The approved scheme involved a significant increase in the height of the turbines originally erected. This is likely to become more common as windfarms reach the end of their lifetime and so it is important strong policy (with the same controls as for a new wind farm) is developed which addresses potential adverse effects. In addition, it is considered that the incorporation of battery storage in all schemes should be a requirement by default.

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

In general terms strengthening the role of the planning system in addressing imbalances between and within communities and tackling disadvantage and inequality is fundamental and is at the heart of the traditional role of planning acting in the long-term public interest. Getting a wider range of people involved in planning for their place and facilitating collaboration is a key part of this approach.

The concept of 20 minute neighbourhoods is an exciting and challenging opportunity to make local places the focus of people's lives and has significant potential to improve health and wellbeing. In most cases this will involve retrofitting existing situations and, therefore, it is important policy provides a steer on how we analyse our communities to see where there are issues and what the solutions might be. Adapting this concept to both monolithic suburbs and rural areas (where small settlements may already suffer from a lack of services and public transport) will be challenging.

The impact of Covid-19 has allowed the planning system to reflect on the approach to planning for communities and address the short and long-term impact of the restrictions on the wider economy and communities. The delay of NPF4 has, therefore, provided an unexpected opportunity to see at first hand the problems and inequalities that exist in terms of health and wellbeing and how to tackle them and so bring forward fundamental change. This highlights the need to support place-based initiatives and solutions including affordable housing delivery in the right places, the regeneration of deprived areas and town centres, and improving access to services and amenities.

The impact of Covid-19 has been especially experienced by those who live in poor quality housing with no/little outdoor private space often in areas marked by vacancy and dereliction and lacking basic local services. This has resulted in highlighting the importance of both a high quality home and local environment; the need for private and public outdoor space; the requirement to address the use of a home for work; and increased use of power and heat during lockdown. It is, therefore, important that policy addresses these issues by setting high standards for space both indoor and outside; natural light; multi-purpose rooms and energy efficiency. Outside the home place-making policies should be widened and strengthened to meet the needs of all communities.

However, Covid has also led to other behavioural changes which include increasing use of delivery services both for everyday food shopping, hot food and comparison goods. This has implications both in terms of delivery miles from depots and retail/hot food outlets and the impact on residential streets.

This theme includes the desire to plan and support the delivery of good quality homes. Consultation took place during 2020 on interim changes to Scottish Planning Policy (SPP) in relation to housing delivery. The Council supported the views expressed in the response submitted by Glasgow and Clyde Valley Strategic Development Plan and this current response provides an opportunity to reinforce that position. This includes:-

- Supporting the proposal to remove 'the presumption in favour of sustainable development where plans are out-of-date' from the SPP.
- Support for the proposal to clarify Paragraph 123 of SPP and the definitions of effective and established housing land supply. Relying on market led housing delivery reinforces the distinction between available housing land and the rate at which it is delivered. Policy focus should, therefore, be on the delivery of difficult locations and on regeneration activities. The delivery of public sector led housing, an important part of the delivery solution, is subject to entirely different delivery drivers from market led development which dictate different rates of build.

- The different methodologies for the calculation of land supply employed by various stakeholders at Development Plan Examinations, Planning Appeals and in court has consumed scarce resources within planning services and has caused significant debate and confusion. The revisions and suggested methodology for the calculation of a five year effective land supply considered to be the most straightforward and robust method of calculating a five year effective land supply. The clarification that the housing land requirement is to be utilised at the point of Local Development Plan (LDP) preparation and that the housing supply target is to be applied in the assessment of planning applications and appeals, is supported as is the proposed approach to assessing proposals where a shortfall in the five year effective land supply emerges.

In the Clydeplan area, the Plan's strategy to deliver a compact city model, (to re-densify the urban area; to regenerate whilst addressing vacant and derelict land and buildings; and to reduce the need for travel), remains highly relevant in addressing the climate, health and economic emergencies. There is a very significant land supply including large scale community growth and regeneration areas and a mixture of brownfield and greenfield opportunities, many of which are currently being built out. Whilst the legacy of urban brownfield sites has its challenges, the delivery of these sites and locations will assist in creating a successful sustainable city region. The fact of slower delivery rates, should not be used as grounds for releasing sites in locations that detract from Clydeplan's strategic aims.:

There is an obvious benefit in joining up community engagement for LDP, Open Space Strategy (OSS) and other council strategies, otherwise, there will be huge staff resource implications and consultation fatigue in local communities. The place standard tool is an excellent mechanism for this as it seems to address all aspects of local community, not just planning issues, and consideration can be given to making this a statutory requirement in particular instances both at the plan/strategy making scale and individual developments.

The resilience of communities can also be defined by their susceptibility to climate change. The Position Statement is light on policy measures to adapt our places to rising sea levels and temperature increases. In contrast, consultation has recently been carried out by Climate Ready Clyde on a draft Climate Adaptation Strategy for the Glasgow City Region (GCR). As a guiding principle the strategy sets out the following conditions as being necessary to help drive the changes needed to achieve the vision:-

- People shape their lives and places so they are climate ready
- People, communities and organisations working collectively to create the right conditions for Glasgow City Region to become climate ready
- Glasgow City Region is made climate-ready by the way resources, services and assets are directed and used

While they are focussed on the GCR, these principles can be applied in a national context. Clearer guidance will be needed to help define climate vulnerable communities.

There will be competing issues around delivering the Infrastructure First principle. The viability of proposals should be addressed as early in the planning process as possible which would reduce the number of unrealistic sites that are submitted, often on a regular basis. The long-term maintenance of infrastructure, climate change measures and natural assets can also be assessed at this early point. This approach would create more certainty. The current review of developer contributions by the Scottish Government is an opportunity to consider whether adaptation measures can form part of that equation where appropriate. At a wider level, while beyond the scope of the planning system, the financing of the development industry should seek to recognise climate change issues.

The link between planning/place and diet and obesity is made and there is also reference to improving access to local healthier food outlets in order to improve health. However, it is considered that significantly more can be achieved through the planning system to better manage the availability of hot food takeaways, particularly in the vicinity of schools and in deprived areas. In addition, while the role of food growing in terms of health and wellbeing, community and quality of life is recognised, there is a lack of clear reference to the benefits of food growing on the environment and tackling climate change.

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

Actively planning for the growth of the economy while at the same time delivering emissions reductions, environmental gains and benefits and employment will be a key priority for NPF4. At the same time, working practices have changed significantly which may mean, for example, a re-evaluation of the use of employment space, especially offices in city and town centres. NPF4 should seek to understand the emerging trends associated with changing demand for traditional employment space once the pandemic is brought under control and 'normality' returns in order to inform investment decisions in the future. This, in turn, could provide opportunities to re-use especially office space. Conversely, the reduced footfall as a result of decreased working in our centres has implications for vacancy trends and the effect on the viability of town centres. Similarly, the effect of Covid-19 and the longer term impact on the economy will have implications for the visitor economy, tourism and leisure facilities and arts and culture.

Provision for small businesses should form part of the strategy for the economic recovery. If there is to be a focus on growing rural communities then consideration needs to be given to the availability of land and buildings in small settlements. Running a business from home in both rural and urban areas is also a key issue for policy direction with potential demand for new housing in the countryside in association with a new business. There will still be a need for sites for bad neighbour type developments which need to be separate from residential areas. Clear guidance on what constitutes social and environmental value and how it is assessed will be needed.

Control of development on peatland should be a priority, however, often it is uses outwith the control of planning that has the greatest impact, for example, forestry.

The encouragement of connection to heat networks is positive, however, very few currently exist and, therefore, how they are to be established and made available to developers has to be addressed.

Increasing digital connectivity will be a key factor in growing the economy in a sustainable way in both urban and rural areas while also improving local wellbeing. Driving forward the Governments Digital Strategy for Planning will be important in ensuring local communities have a greater say in designing and planning local places. Reference is made to the potential ability of national developments to achieve the vision of improving digital connectivity, however, the contribution developers at a local level can make should also be made explicit.

Reference is made to managing the demand for private transport and reducing the need for unnecessary journeys. While this is an important goal, it will require wholesale changes to people's views on the use of private cars which are unlikely to change without dependable and cheap alternatives being made available. The various policy strands that run through the Position Statement seek to achieve this goal but recognition needs to be made that fiscal and other incentives will be required.

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

Improving the quality of new development should be a fundamental outcome for the planning process. Stronger policy direction on the design of places and incorporating nature based solutions should be a priority and the suggestion of embedding the Place Principle throughout NPF4 and refreshing Designing Streets is welcome. Support for local authorities to resist poorly designed proposals is important.

The retention of existing premises could have implications for economic development as many industrial units are now obsolete and it may be more appropriate to demolish and replace them rather than trying to re-use and retrofit them in viability terms.

Town and city centres have borne the impact of the economic downturn and a focus on strengthening their wider role is welcome. They will have an important part in establishing 20 minute neighbourhoods. The role of neighbourhood centres within existing residential areas will also have a key role. Policy to address issues such as lower residential populations, access and traffic problems and the use of outdoor space is required. The development of thinking on car free or 'car light' developments in town and city centres especially can be moved forward with an increased emphasis on alternatives such as car clubs and car sharing, particularly through the provision of electric vehicle hubs. More detailed guidance will be required around how to identify appropriate sites for community hubs and how they will be delivered. It will be particularly difficult to find sites in rural villages while the ability for disadvantaged communities to facilitate will be limited in most cases

In terms of the goal of repopulating the rural area, there is a tension with addressing climate change issues as access to services and public transport will be more limited or non-existent. It is unlikely an urban approach can be applied. A template could be created that sets out the minimum criteria/standards to be met to help identify growth areas. A clear policy on where new housing in the rural area will be appropriate is required. The focus should be directed to the growth of small settlements that may be able to provide services and amenities rather than isolated groupings. Clarification is also needed on whether the growth of communities will be acceptable in the Green Belt.

A key issue is making brownfield land deliverable and mechanisms for achieving this can be incorporated into NPF4. There is potential for an increase in vacant sites following Covid/Brexit so it is important that NPF4 recognises that recent vacant land may increasingly become an issue as well as the long-term legacy sites. However, for the focus on brownfield land to be successful, there needs to be complementary policy to restrict greenfield development and possibly establish a Brownfield First principle.

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

The delivery mechanisms described in the Position Statement are considered to be appropriate as they cut across a variety of themes and topics and establish that a collective approach by all stakeholders is required. Support for the role of Regional Spatial Strategies in delivering the outcomes is noted and welcomed and the Glasgow City Region has proven to be an exemplar in delivering investment in the area, particularly in terms of City Deal.

The infrastructure-first principle is sound and embedding the consideration of infrastructure requirements at the start of the plan-making stage is welcome. A concern is the availability of data to inform these decisions and the need for providers to be on board and to be able to contribute timeously in the context of the anticipated timescales for the preparation of the new style LDPs.

In terms of seeking developer contributions, experience has shown that this is a time-consuming process resulting in delay to the issuing of decisions and, therefore, delivery on the ground. The Council has developed formulaic approaches to demonstrate the need for contributions and arrive at a level of payment based on the costs associated with delivery of infrastructure to offset the impact of development. This is likely to be reinforced if the infrastructure levy is introduced which would increase the range of matters to be addressed by developers. A similar nationwide approach could be considered to provide certainty and consistency. However, the main focus of engagement is around the impact of contributions on the viability of proposals and, therefore, strong policy direction and guidance is required. At the same time, the role of private developers in delivering on the themes in the Position Statement will be important so care needs to be taken to ensure contributions are proportionate and do not divert investment away from the places it is most needed.

Finally, the proposed policy direction will bring some interesting challenges for planners, particularly in the public sector. A range of additional skills and knowledge will be required to ensure delivery and, therefore, the training needs associated with the Position Statement should be reviewed and addressed as soon as possible. At the same time, the impact on resources is likely to be significant during a period when the number of planners employed by local authorities continues to decrease. The consideration of the outcome of the consultation on the review of fees should be revisited as a matter of urgency to ensure the planning service is fully resourced to ensure the main themes set out in NPF4 are implemented. This is at a time when fee income from planning applications has not recovered due to the decrease in application numbers during the period of COVID-19.

6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

None

7. Do you have any other comments on the content of the Position Statement?

The Position Statement is a well-balanced review of the challenges and opportunities that the nation faces and a demonstration of how the planning system can intervene and deliver solutions to address what are, in some cases, widespread and fundamental issues. At the same time, it has been developed during a period of unparalleled disruption and uncertainty. This may turn out to be a short term situation and we see a return to normal. Conversely, changes that have been experienced in the last 10 months may become the 'new normal'. It is important when drafting NPF4 that we take stock of the position at that time and not over-react, in order to avoid the wrong solutions being proposed.