

EAST RENFREWSHIRE COUNCIL3 March 2022Report by Director of EnvironmentDRAFT NATIONAL PLANNING FRAMEWORK 4 (NPF4)**PURPOSE OF REPORT**

1. The purpose of this report is for Members to note the publication, for consultation, by the Scottish Government of the Draft National Planning Framework 4 (NPF4) and the Council's formal response.

RECOMMENDATIONS

2. It is recommended that the Council:
- a) Notes the publication of the Draft NPF4 and its consultation timeline; and
 - b) Approves the formal response to the Draft NPF4 as set out in Appendix A and its submission to Scottish Government.

BACKGROUND

3. The Planning System in Scotland is undergoing a substantial transformation and the context for preparing our next Local Development Plan (LDP3) has changed significantly. LDP3 will now be prepared under the Planning (Scotland) Act 2019 which has introduced a new statutory process for Local Authorities in preparing local development plans together with enhanced status for the National Planning Framework. Future LDPs will now be required to be reviewed every 10 years rather than 5 under the current system. LDP3 will establish a new long-term vision and strategy for East Renfrewshire alongside the delivery of new infrastructure.

4. The Fourth National Planning Framework (NPF) is a long-term plan (up to 2045) for Scotland that sets out where development and infrastructure is needed. It will guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities. The Draft NPF4 has been published for public consultation until 31st March 2022.

5. NPF4 will be one of the key documents that will inform the next LDP, in particular setting our future housing requirements, and with an increased focus upon climate change, improving health and well-being, and securing positive effects for biodiversity and nature recovery. Draft Development Plan Guidance and Open Space and Play Sufficiency guidance has also been published for public consultation until 31st March 2022 which will also inform LDP3 preparation and requirements.

6. NPF4 is central to the implementation of the Scottish Government's vision for the future of planning in Scotland. NPF4 will hold an enhanced status and be a formal part of the development plan and incorporates the update to Scottish Planning Policy (2014), resulting in spatial, thematic and national policies being addressed in one core document. This means that NPF4 will influence planning decisions at all levels.

7. In addition, once the draft NPF4 is approved the current Clydeplan Strategic Development Plan (July 2017) will no longer form part of the Development Plan.

8. NPF4 will guide the preparation of Regional Spatial Strategies, Local Development Plans and Local Place Plans. NPF4 will also be relevant to wider policies and strategies relating to land use. Regional Spatial Strategies will be prepared and will provide clear place-based spatial strategy that guides future development across different areas of Scotland, but they will not have a statutory status.

9. The Draft NPF4 and associated information can be found via the following link <https://www.transformingplanning.scot/national-planning-framework/>

10. It is anticipated that Scottish Parliament will approve the finalised NPF4 in summer 2022.

REPORT

11. The Draft NPF4 consists of 4 parts, namely:

12. **Part 1** sets out the national spatial strategy which guides decisions on future development across Scotland, and aims to deliver net zero sustainable, liveable, productive and distinctive places, central to spatial objectives. These four key themes run throughout NPF4, guiding much of the framework's priorities and policies. The Draft NPF4 provides a spatial strategy and core planning policies to guide where development and infrastructure should go.

13. The National Spatial Strategy is underpinned by six spatial principles: compact growth; local living; balanced development; conserving and recycling assets; urban and rural synergy; and a just transition.

14. It also recognises the different challenges and opportunities across Scotland's regions, which are outlined in five geographic 'action areas'. In the context of the Glasgow City Region this is included as part of what is described as 'Central urban transformation' aimed at transforming and pioneering a new era of low carbon urban living.

15. **Part 2** sets out 18 national developments, which support the delivery of the National Spatial Strategy. Of relevance to East Renfrewshire are the Central Scotland Green Network; National Walking, Cycling and Wheeling Network; Urban Mass/Rapid Transport networks; Urban Sustainable, Blue and Green Drainage Solutions; Circular Economy Material Management Facilities; Strategic Renewable Electricity Generation and Transmission Infrastructure; and the Digital Fibre Network.

16. **Part 3** sets out 35 national planning policies. These policies will replace those currently found in the Scottish Planning Policy (2014). This section sets the policy framework for all decision making and relate to the following 4 themes.

1. **Sustainable Places** - There are six policies proposed within this section of Draft NPF4. These policies are intended to be applied to all planning decisions, as 'universal policies', namely: Policy 1: Plan-led approach to sustainable development; Policy 2: Climate emergency; Policy 3: Nature crisis; Policy 4: Human rights and equality; Policy 5: Community Wealth; and Policy 6: Design, quality and place.

2. Liveable Places - Policies 7 – 15 relate to the 20min neighbourhood, infrastructure first approach, housing, sustainable transport, blue and green infrastructure, sustainable flood risk and health and well-being.
3. Productive Places -Policies 16 – 23 relate to the creation of a productive place for Scotland, where there is a focus on supporting good, green jobs, businesses and industries for the future.
4. Distinctive Places - Policies 24-35 cover the topics of town centres, historic environment, green belt, vacant and derelict land/buildings, rural areas, natural environment, peatland, trees, forestry and woodland and coasts.

17. Policy 9 concerns 'Quality Homes'. The Draft NPF4 notes that *'the planning system should support the delivery of more and better homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland'*. This policy refers to Annex B which sets out the 10 year Minimum All Tenure Housing Land Requirement (MATHLR) for each local authority area. For East Renfrewshire the MATHLR is shown as **2800** additional homes over a 10 year period which averages at **280** per annum. The concept of 20-minute neighbourhoods is further referenced. Development proposals of more than 50 residential units will be accompanied by a Statement of Community Benefit. The need for a minimum of 25% affordable housing on a site is included.

18. **Part 4** sets out an outline of how the Scottish Government will deliver the strategy. This will be developed into a standalone, live delivery programme once NPF4 has been approved.

Summary of proposed ERC Response

19. The proposed Council response to the draft NPF4 consultation is as set out in Appendix A. The process has been led by the Planning Service with comments provided by a range of other internal Council services.

20. In summary, the response provides support for the overall aim and ambitions of the Draft NPF4, in particular the recognition of current and emerging themes concerning the climate and biodiversity crisis, placemaking and sustainable and inclusive growth and preference for brownfield land over Greenfield. It is recognised that these must be the primary guiding principles for all our plans and planning decisions if we are to make lasting and real change. However, delivery and implementation of this approach will require a radical rethink as to how we plan places and the approach from the key agencies, private sector and the development industry.

21. The thematic approach provides a clear and logical structure to the document. There is support for the ambition of NPF4 to transform the way land and buildings are used so that every decision made makes a contribution to ensuring that Scotland is a more sustainable place.

22. However, due to the significant climate and nature crisis facing Scotland it is questionable whether the Draft NPF4 is strong enough in its language and wording. The response outlines that overall it was felt that Scottish Planning Policy (SPP 2014) provided a clearer distinction between Local Development Plan (LDP) and Development Management functions and requirements. There is also a general lack of linkages and consistency between policies. It is viewed that many of the policies are not sufficiently robust and clear and may not stand up to legal challenges.

23. The response queries the role and status of Regional Spatial Strategies (RSSs) in delivering the aims and ambitions of the Draft NPF4. The response emphasises the importance of regional spatial planning to the Glasgow City region and to the constituent local authorities, which includes East Renfrewshire.

24. The response welcomes the concept of Quality Homes and supports the move to a more flexible and locally based approach to the new Minimum All Tenure Housing Land Requirement (MATHLR). Successful place-making is about more than housing numbers and it is hoped that this approach will reduce the time and resources spent on debating housing numbers and allow a greater focus upon the delivery of high quality homes across all tenures and the creation of well-designed sustainable places and environments that support healthy lifestyles and contribute to well-being. However, the level of resources required to deliver the East Renfrewshire MATHLR and required new infrastructure will be significant and in particular the impact this will have upon our existing education estate.

25. The response welcomes the importance being attached to place-based approaches, especially by embedding the 20-minute neighbourhood approach and that infrastructure considerations should be at the heart of planning and place making. Emphasis on a greener, fairer and more inclusive wellbeing economy is also welcomed.

26. Critical to the success of NPF4 will be its delivery and implementation. It is disappointing that the delivery programme outlined in part 4 was not prepared alongside the Draft NPF4. The Draft NPF4 places additional requirements on Planning Authorities, and complexity in particular through assessing and determining planning applications and reviewing Local Development Plans. This will require upskilling of planning staff. There is a need to ensure that there is both a capital investment programme working alongside the NPF and an investment in planning services to ensure delivery of Scottish Government aims.

FINANCE AND EFFICIENCY

27. There are no new financial implications at this point in time. However, as indicated in the response additional resources will be required to deliver the objectives of the 2019 Planning Act and the requirements of NPF4.

CONSULTATION

28. Preparation of the response has been led by the Planning Service with comments also provided by a range of other internal Council services.

29. The proposed response has been discussed with the established LDP Member/Officer working group.

PARTNERSHIP WORKING

30. Preparation of the response has been led by the Planning Service with comments also provided by a range of other internal Council services.

IMPLICATIONS OF THE PROPOSALS

31. There are no new staffing, property, policy, IT, equalities or other implications at this point in time. However, as indicated in the response additional resources will be required to deliver the objectives of the 2019 Planning Act and the requirements of NPF4.

CONCLUSIONS

32. This report seeks Council approval to submit a formal response on the draft NPF4 to Scottish Government.

33. The response sets out support for the publication of the Draft NPF4 and the overall aim and ambitions of the document. NPF4 is a critical document in shaping the spatial strategy for Scotland for the next 20+years and East Renfrewshire's proposed LDP3. There is support for the commitment to tackling the climate crisis, to minimise emissions and to enhance biodiversity. The response also welcomes the importance being attached to place-based approaches, especially by embedding the 20-minute neighbourhood approach. However, it is unclear whether the Draft NPF4 is strong enough to provide the necessary tools for planning staff to help deliver the NPF4 ambitions within future developments.

RECOMMENDATIONS

34. It is recommended that the Council:

- a) Notes the publication of the Draft NPF4 and its consultation timeline; and
- b) Approves the formal response to the Draft NPF4 as set out in Appendix A and its submission to Scottish Government.

Director of Environment

February 2022

APPENDICES:

Appendix A: Draft Fourth National Planning Framework (Draft NPF4) - East Renfrewshire Council Response

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Draft Fourth National Planning Framework (Draft NPF4)

East Renfrewshire Council Response

Part 1 – A National Spatial Strategy for Scotland 2045

General

East Renfrewshire Council welcomes the publication of the 'Draft Fourth National Planning Framework (Draft NPF4)'. The overall aim and ambitions of the Draft NPF4 are welcomed and supported, in particular the recognition of current and emerging themes concerning the climate and biodiversity crisis, placemaking and sustainable and inclusive growth, health and well-being and preference for brownfield land over Greenfield. We also support matters set out in the joint Clydeplan response.

We welcome the ambition of NPF4 to transform the way land and buildings are used so that every decision made makes a contribution to ensuring that Scotland is a more sustainable place. It is vital that NPF4 is a key Scottish Government corporate document that influences decision making and funding priorities across all strategies. We are of the opinion that the NPF4 should be retitled 'National Development Plan' to reflect the enhanced status of the document over the previous versions of NPFs.

We strongly support the continued support for a plan-led planning system in Scotland. Development plans have a key role in addressing climate change, creating quality functional places, providing necessary infrastructure and sustaining and supporting communities in addressing the impacts of COVID 19. The climate emergency and COVID pandemic have highlighted that we all need to think and act differently. The planning process has a key role to play in effecting the changes required. NPF4 must provide a robust framework to ensure we meet net zero objectives. However, delivery and implementation of this approach will require a radical rethink as to how we plan places and the approach from the key agencies, private sector and the development industry.

Significant elements of the Draft NPF4 have the potential to support and help deliver the spatial objectives of the East Renfrewshire LDP2, namely to: Create Sustainable Places and Communities; Promote Sustainable and Inclusive Economic Growth; and Promote a Net Zero Carbon Place. These objectives will be refreshed through preparation of LDP3 to accord with the thematic structure of NPF4.

We are of the opinion that the current Scottish Planning Policy (SPP 2014) provided a clearer distinction between Local Development Plan (LDP) and Development Management (DM) functions and requirements. There is a general lack of linkages and consistency between policies – better cross referencing to show policy linkages would improve the document. Additionally, there is a disjointed feel to the terminology and language used for some of the policies for e.g., policies refer to requirements for LDPs, Development Plans, decision makers and also set out criteria for assessing proposals.

It is viewed that many of the policies are not sufficiently robust and clear and may not stand up to legal challenges. The policies in NPF4 require to be clearly understandable and deliverable. There are too many 'coulds' and 'shoulds' rather than directing change. The policies need to be further developed and shaped so that they truly give a clear and firm direction, without being widely open to interpretation. If this can be done then the ambition for a step change and streamlining of the development plan could be achieved. However, as they currently stand, it is likely that many of these national policies will have to be repeated and clarified in individual LDPs in order that the local authorities can firm up and set out their

interpretation of these policies reflecting local context. This may inevitably lead to a varied approach across the country (as well as increased opportunities for challenge).

We are also of the opinion that some of the policies are clearly aims or objectives of the planning system and which are already set out in the Development Plan Regulations. There is no need to repeat them as policies in NPF4, however they could usefully be set out in the introductory text to the document.

The use of **BOLD** type throughout the document is confusing and should be removed.

The document is long and detailed and this may reduce public and community input. A simple summary document would have been helpful.

As the Scottish Government moves towards approval of the NPF4 transitional arrangements will be crucial for Local Authorities to cover the transition between the previous legal framework of the 2006 Act and the current 2019 Act. In addition, the Scottish Government needs to provide clear guidance on the status of NPF4, once approved, in relation to S13 of the 2019 Act in the event of '*any incompatibility between a provision of the National Planning Framework and a provision of a local development plan*'. This is critical for both Development Planning and Development Management functions.

National Spatial Strategy

The National Spatial Strategy guides decisions on future development across Scotland, which aims to deliver net zero sustainable, liveable, productive and distinctive places, central to spatial objectives.

The National Spatial Strategy is underpinned by six spatial principles– compact growth, local living, balanced development, conserving and recycling assets, urban and rural synergy and a just transition. It also recognises the different challenges and opportunities across Scotland's regions, which are outlined in five geographic "action areas".

The overall approach and ambition of the document is welcomed, however, due to the significant climate and nature crisis facing Scotland it is questionable whether the Draft NPF4 is strong enough in its language and wording and how useable the National Spatial Strategy will be for Development Management purposes.

It is disappointing that the previous reference in SPP (2014) to '*the right development in the right place*' has not been carried forward to the Draft NPF4. This is a fundamental objective of planning and is particularly relevant to NPF4 as it provides the spatial context and direction for each Local Authority. NPF4 needs to be clear that it has to be the right development in the right place. The terminology is mentioned within Policy 9 'Quality Homes' but needs to be upfront and prominent in NPF4.

Page 1 states that part 1 of the NPF4 should be used to guide the preparation of Regional Spatial Strategies (RSSs), Local Development Plans and Local Place Plans. The introductory section of part 1 should also clearly state that LDPs and RSSs will be key to the delivery of the 4 spatial themes and 6 spatial principles. We are unclear what the role and status of RSSs are in delivering the aims and ambitions of the Draft NPF4. The role of cross boundary issues needs to be more strongly considered. We wish to continue to emphasise the importance of regional spatial planning to the Glasgow City region and to the constituent local authorities such as East Renfrewshire.

The thematic approach provides a clear and logical structure to the document but there is also a lack of connection and cross referencing between some policy sections. For example, *Policy 3: Nature Crisis* does not make links to *Policy 6 Design Quality and Place*; *Policy 29 Urban Edges and Greenbelt*; *Policy 32 Natural Places*; or *Policy 34 Woodland trees and Forestry*. This is despite there being clear over-laps between each policy area. One way of demonstrating over laps maybe to make better use of infographic and diagrammatic representations.

It is noted that the Draft Development Plans guidance section 11 states that the spatial strategy should be reflected in maps, site briefs and masterplans in a way that is relevant and accessible to people with an interest. The East Renfrewshire LDP2 uses story mapping technology to better connect with our residents. This type of approach has also been used recently at a national level for the Strategic Transport Projects Review 2. With NPF4 polices becoming part of the Development Plan, the NPF4 will have a new and wider audience than its previous iterations and should be correspondingly accessible to that audience.

There is a lack of a coherent organisational chart within the documents which sets out the context, roles and interactive relationships between the key supporting documents and strategies. The mapping throughout is poor and unclear. There is a general lack of diagrams throughout the Draft. Policy and proposals detail will therefore need to be clearly set out in LDPs and, where appropriate, Regional Spatial Strategies (RSS).

Draft NPF4 does not reference some important external national and regional policies and strategies that will influence planning decisions. Cross reference with these documents and the inclusion of a list of references to national/regional I policies within the Annex would acknowledge the complex policy environment and strengthen the policies actual NPF4 polices. Examples of Key documents that should be referenced include: *The Glasgow City Region Economic Strategy 2017 -2035* and while the concept of circular economy is mentioned throughout Draft NPF4 but the national circular strategy *'Making Things Last' (2016)* is not referenced. These are examples and there are other national strategies that could be referenced.

It is surprising that there is no reference to the impacts of COVID-19 or the key issue of an ageing population of Scotland within the national spatial strategy section. The Draft NPF4 fails to adequately consider the housing needs of older people.

It is not clear if the Draft NPF4 takes account of the Scottish Government's Population Strategy (May 2021) which referenced a need for a more balanced distribution of population across Scotland. The housing calculations utilise the 2018 NRS household projections but there is less emphasis on population forecasts.

Critical to the success of NPF4 will be its delivery and implementation. It is disappointing that the delivery programme outlined in part 4 has not been prepared alongside the Draft NPF4. There is a need to ensure that there is both a capital investment programme working alongside the NPF and an investment in planning services. Further commentary on this matter is set out under our response to Part 4 of the Draft NPF4.

The Draft NPF4 places additional requirements on Planning Authorities, and complexity in particular through assessing and determining planning applications and reviewing Local Development Plans. This will require additional resources and the upskilling of planning staff and elected members. Consideration needs to be given to the timescales and expectations on Planning Authorities to determine applications. Should greater emphasis be placed on producing the outcomes society needs rather than focusing upon the speed of determination of planning applications? Increased pressure will also be placed on the development industry

regarding the submission of additional supporting information to support applications and to develop schemes which meet the requirements and aspirations of NPF4

Sustainable Places

Q1: 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?

The overall approach and ambition are welcomed and supported, in particular the recognition of the overarching climate and biodiversity crisis. As well as a climate emergency, we are also in the middle of an ecological emergency. Both are connected and should be tackled together. Climate change has exacerbated the impact of habitat loss and the fragmentation of existing biodiversity. However, encouraging sustainable design and use of resources does not go far enough. NPF4 is a national spatial development plan and needs to be more ambitious and firmer on requirements.

Delivery and implementation of this approach will require a radical rethink as to how we plan places and the approach from the key agencies, private sector and the development industry. Securing and delivering a high-quality development is the responsibility of everyone in the planning and development process. However, it will be difficult to reconcile the climate change objectives with aims to pursue growth for many Local Authorities. This should be acknowledged in the Draft NPF4.

'Encouraging' low and zero carbon design and energy efficiency is not sufficient to ensure delivery. This approach has been encouraged for years with limited success. What is needed is a requirement in national policy followed through to building standards legislation. Continuing only to 'encourage' in this climate emergency will not deliver our future net zero places.

Page6 refers to *'securing positive effects for biodiversity'*. This section would be strengthened through references to biodiversity net gain. In addition, detailed information is required on how positive effects for biodiversity and creating and strengthening nature networks will be achieved, resourced and maintained going forward (not just in terms of capital investment, but also in terms of revenue investment for ongoing maintenance and management of these networks). Land ownership issues also need to be considered.

References to brownfield development and utilising existing areas and infrastructure should be included. It is critical that NPF4 focuses not only on the 'new' but also recognises what we currently have and building upon this to make them more resilient to climate change etc.

Liveable Places

Q2: Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

The approach is welcomed and supported; however, delivery and implementation of this approach will require a radical rethink as to how we plan places and the approach from the key agencies, private sector and the development industry.

There is very little detail within the Draft NPF4 on how this transformative social and economic change is going to be delivered. Planning will not achieve this on its own. References to other supporting strategies would have been helpful.

It is agreed that urgent action is needed in order to deal with the challenges created by the COVID-19 pandemic and the need to significantly improve our places, however there needs to be more detail on the actual steps that will be taken to address longstanding inequality and eliminate discrimination.

We welcome the importance being attached to place-based approaches, especially by embedding the 20-minute neighbourhood approach. However, implementation of this concept will require very different approaches in the urban and rural areas and also raises questions as to how successfully it can be retrofitted into existing established residential or urban areas where available space is at a premium.

In areas with very few brownfield infill sites, it is going to be difficult to marry up the delivery of significant housing targets with sustainability, climate change and 20-minute neighbourhood aims, as there is likely to be a reliance on greenbelt release. Consideration needs to be given to how a true infrastructure first approach can be properly delivered and funded to ensure 20-minute neighbourhoods with all of the services and facilities needed can actually be delivered. This detail should be included in NPF4.

Consideration should be given to local office hubs to enable people to work from near their homes where home-working is not possible, supported by digital connectivity.

We fully agree with empowering more people to shape their places and input to the planning process. Planning can also give local communities opportunities to take action on climate change by encouraging active participation in future local place plans.

Delivering liveable places requires a deep understanding of local context and this should be better reflected in the Draft.

How do we actually define '*high quality*' and '*great places*'? Clarification is required.

Productive Places

Q3: 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?

There appears to be a dichotomy here between economic growth and both zero carbon and green recovery objectives. The approaches required to tackle climate change can offer major economic opportunities, with the potential for significant job creation in the renewables sector. This will require linkages between the plans and strategies at all levels and across public and private organisations in recognising the vital role that the planning system plays in delivering new renewable technologies and, ultimately, a new green economy. It will also be essential to understand and recognise skills gaps and provide relevant training and upskilling for 'green jobs'.

We note the reference to a future National Strategy for Economic Transformation, however NPF4 needs to set out not just an overall aim, but also exactly what ministers are committing to in terms of green investment and what their requirements are in terms of community wealth building.

The terms '*Community Wealth Building*' and the '*Wellbeing Economy*' need added to the glossary. It would be helpful to provide local authorities with specific guidance on what a wellbeing economy will mean in local terms and the performance metrics that should be used to assess this

There is no acknowledgment of the rise and increased opportunities for home working since COVID-19 and other changes to travel, retail social patterns arising from the pandemic. This has the potential to both support as well as hinder aspirations for a green recovery and development of a wellbeing economy.

The requirement for development proposals to incorporate appropriate, universal and futureproofed digital infrastructure is discussed within Policy 23. For consistency the important role of Digital Infrastructure to stimulate innovation and investment should be referenced within this section.

It would be useful to set out a specific ambition to support a circular economy through planning and economic policy under this heading. A circular economy could be making use of Scotland's low-carbon energy system to manufacture goods that lower carbon footprints to their customers. A circular economy can also provide local employment through increased opportunities to repair, reuse, refurbish and refill – all requiring a local footprint to serve communities.

Distinctive Places

Q4: 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?

A stronger commitment to place-making, through a design led approach and a focus on quality, is welcomed, however this needs to be followed through in decision making, including decisions made by Reporters at appeal. Where a proposal falls short, Council's need to be supported to refuse applications and insist on high quality proposals.

The commitment to restoring the richness of Scotland's natural environment, to protect and enhance our historic environment, and to safeguard our shared heritage for future generations is welcomed. Again, funding and detail on how this is intended to be delivered and maintained will be key.

Encouraging developers to incorporate green infrastructure and nature-based solutions into new developments is a key challenge, particularly if there is a perception that it may be more time consuming and/or costly to do so and land intensive. Sadly, all too often green infrastructure is an afterthought in the design process. NPF4 must robustly promote a green infrastructure first approach.

We would welcome consideration of an approach that considered 'Natural Capital' as promoted by the Scottish Forum on Natural Capital.

Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

As above, the overall aims and ambition is welcomed, however in general it is felt that this spatial strategy could go further, given that urgent action is needed to address the climate and nature emergencies. If this is to truly be a national development plan, it needs to set out detail and requirements on how these aims are going to be achieved and successfully delivered.

Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

The spatial principles are considered to be appropriate, but more clarity and definitions are required and they should be an integral part of policy. There needs a strong policy framework to be in place to deliver the spatial principles. How much weight should be given to these principles in the decision-making process? They are not mentioned in Part 3 'National Planning Policy Handbook'.

The introductory text would be strengthened by replacing the phrase '*No single policy*' in the 2nd sentence with '*Every policy, proposal, development and principle will make a contribution to the delivery of sustainable, liveable, productive and distinctive places*'.

It would have been helpful if the introductory text clearly stated the wider linkages to the 6 spatial principles and that they will support the delivery of the national spatial strategy and are further supported by a number of strategic and development management policies which provide direction.

We support the principles of Principle (A) '*Compact Growth*' which reflects the approach taken for Clydeplan Strategic Development Plan (2017). The principles will help deliver sustainable growth; however, it will be harder to achieve with a switch away from regional planning and the move to individual local authority targets. In some areas the only way in which to achieve significant housing minimum requirements will be to release greenbelt land or create new communities in rural areas, which would be contrary to the compact growth principle when you consider a city region. It will also come with significant infrastructure challenges. The wording should be stronger to prioritise a brownfield first approach before consideration is given to Greenfield and Greenbelt sites and then only in accordance with other relevant policies of the NPF4. We support the principle of increasing density but this can be difficult to achieve in already developed urban areas.

The principles should clearly refer to the protection and enhancement of the Greenbelt and making efficient use of existing infrastructure and ensuring the coordinated delivery of new infrastructure and investment.

We welcome acknowledgement of the requirement to address health and well-being within the spatial strategy section. However, there should have been greater emphasis on this matter within the spatial principles. Health is only mentioned within the 'local living' principle.

Principle B final sentence should be amended as follows. Virtual connectivity and active travel links will also be ~~important~~ essential.

Principle C '*Balanced Development*' refers to managing development more sustainably in areas of high demand but lacks any clarity as to how this will be achieved. High demand areas such as East Renfrewshire will continue to face pressure for housing development. It will continue to be a challenge to reconcile this growth with climate change objectives. This was a function of Clydeplan and the RSS is ideally placed to take this agenda forward through a regional strategic approach and collaborative HNDAs process. The housing market area approach allowed for adjustment of figures to reflect the operation of the wider housing market areas and operation of private sector moves.

Principle E should be amended as follows – '~~As part of this, we will improve green infrastructure~~ protect, create and enhance an integrated multi-functional green network and connected green spaces to bring...' Principle also needs to mention long term maintenance and whole life cycle approach.

Landscape matters should be reflected in Principle E.

Town Centres, natural heritage housing and historic environment should be specifically referenced.

Explanation is required as to what 'Urban and Rural Synergy' and 'Just Transition' means.

Q7: Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Q14: Do you agree with this summary of challenges and opportunities for this action area?

Q15: What are your views on these strategic actions for this action area?

We are supportive of the principle of designating 'Action Areas' and the setting of key regional priorities and place-based opportunities to take the spatial strategy forward. However, the lack of any reference to the role of Regional Spatial Strategies (RSSs) is a significant omission. It is unclear what the role and status of RSSs are and how they would tie in with these much wider 'regional' priority action areas. This section doesn't seem coherent or link action areas to each other. Given the potential cross boundary nature of these proposals new partnership working arrangements will need to be created to ensure implementation of the concept. Local Authorities must work with adjoining Local Authorities and other relevant stakeholders on these matters. The Draft NPF4 must recognise the importance of this partnership working but also the resources required to achieve this.

This section aims to provide a regional focus but lacks sufficient local detail and is too simplistic to be of value to Development Management. RSSs are suitably placed to provide the spatial detail at a regional level to deliver the objectives set out in NPF4. We wish to continue to emphasise the importance of regional spatial planning to the Glasgow City region and to the constituent local authorities.

Part 4 Page 113 Discusses the role of RSSs in delivering the national strategy at a regional and local level. It states that '*New regional spatial strategies can identify areas for future population growth, align with regional economic strategies and identify key sectors and clusters for future development and investment. We expect them to set out a clear place-based spatial strategy that guides future development across different areas of Scotland*'. It is unclear how these statements relate to the Action Areas. Are RSSs able to identify additional areas for development? There needs to be more clarity on the role of RSSs, cross boundary issues and also how LDPs are to reflect these ambitions in their strategies and policies. The use of additional diagrams would have been helpful.

The spatial strategy action areas are very broad and wide ranging and cover large geographical areas that contain places with significant differences. Actions like transforming and pioneering a new era of low carbon urban living should be an aim for the whole of Scotland not just the central urban area. Suburban opportunities to live low-carbon lifestyles will mean supporting less travel requirements, linked to 20-minute neighbourhoods and local circular economy (service and sharing economy) principles. The same would apply to the aim of sustainability and creating connected, liveable places which benefit from further investment and innovation – why would this only be a focus for the southern action area? Furthermore, nearly all aspects of addressing climate change will require work that must be carried out across local authority boundaries. Supporting cross boundary cooperation and setting long term strategic direction for LDPs and linking with RSSs and NPF4 will be critical to our long-term approaches.

East Renfrewshire Council falls within the 'Central Urban transformation Action Area', which covers central Scotland. We are supportive of the aims of this action area as set out on page

30 and continued support for the Central Scotland Green Network, focus on reinventing and reimagining city centres to contribute to economic recovery and accelerating urban greening through green and blue networks. There is also a clear focus on reusing empty buildings and vacant and derelict land. However, the designation of the whole Central Belt, particularly bringing Glasgow and Edinburgh together appears too large an area to be considered appropriate. There is scope to split this regional area into separate 'action areas'. There are many distinctive and diverse urban and rural areas within this action area and identifying the central Scotland as a single action area might fail to properly capture the significant differences that exist within and across the area and the vastly different challenges that these areas face. Some areas may become marginalised due to a focus on the 2 main city areas.

The text refers to '*pressure on infrastructure in some hot spots*' and references Edinburgh city region, Stirling, Falkirk and Perth. However, it could be argued that this statement is applicable to the majority of areas within this 'action area'. Infrastructure pressure is a significant challenge for all Local Authorities. In addition, it is stated that '*it can be more challenging to encourage the market to deliver new homes towards the west of the central belt*'. Again, this is a very sweeping statement and fails to recognise the buoyant high demand housing markets such as within East Renfrewshire. The Draft NPF4 does not fully acknowledge or seek to adequately address the factors which affect future housing/economic growth/demand in the Glasgow city region.

Para 20 (page 40) discusses reimagining development on the urban fringe. Clarification on what this means would be helpful. The supporting text outlines the important functions and benefits of the urban fringe areas and the importance of making sustainable use of the countryside around our cities and towns. We are supportive of these aims; however, it will be difficult to reconcile these objectives and wider climate change and sustainability objectives of the Draft NPF4 with meeting future housing requirements. Meeting our housing requirements may result in edge of settlement green belt release sites, contrary to NPF4 climate change, biodiversity, brownfield objectives and 20-minute neighbourhoods.

Q8-13 and 16-17

No specific comment.

Q18: What are your overall views on this proposed national spatial strategy?

No further comments.

Part 2 – National Developments

There are 18 national developments, which support the delivery of the National Spatial Strategy. We are supportive of the principle of identifying national developments in the Draft NPF4.

We welcome the continued support for the Central Scotland Green Network; National Walking, Cycling and Wheeling Network; Urban Mass/Rapid Transport networks; Urban Sustainable, Blue and Green Drainage Solutions; Circular Economy Material Management Facilities; Strategic Renewable Electricity Generation and Transmission Infrastructure; and the Digital Fibre Network.

The alignment of resources, plans, strategies and funding over the short, medium and long term is critical.

Since these national developments represent significant upgrading of existing and new infrastructure assets, development of NPF4 represents an opportunity to outline or instigate potential governance structures to facilitate coordination, delivery and operational management of national developments over the lifetime of the plan and beyond.

Part 3 – National Planning Policy

This section sets out 35 national planning policies, which will replace those currently found in the Scottish Planning Policy. This section sets the policy framework for all decision making.

We are of the view that Scottish Planning Policy (SPP 2014) provided a clearer distinction between Local Development Plan (LDP) and Development Management (DM) functions and requirements.

Sustainable Places (Universal Policies)

Q22: Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

As well as a climate emergency, we are also in the middle of an ecological emergency. Both are connected and should be tackled together. We therefore agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions. These must be the foundation if we are to make lasting and real change. We are supportive of a place focussed green recovery. It is also important that the nature and biodiversity crisis is given similar weight in decision making to the climate change emergency. Policies 2 and 3 set out the criteria for delivering on these principles. However, this can only be achieved through close partnership working with all stakeholders across the public and private sectors. The challenge will be to reconcile these principles with growth aspirations.

We agree that the universal policies should apply to all applications. However, as outlined in our general comments we feel that some of the policies are clearly aims or objectives of the planning system which do not need to be repeated in the Draft NPF4 as policies.

Policy 1: Plan-led approach to sustainable development**Q23: Do you agree with this policy approach?**

We strongly support the plan-led approach to sustainable development as reflected in Scotland's National Outcomes and the UN Sustainable Development Goals. A plan led system provides certainty for communities as well as the development industry, key agencies and infrastructure providers. However, as NPF4 is to be the new national development plan, it is suggested that rather than being focused on what LDPs should do, this first policy should make a clear statement on what the national development plan is going to do.

The requirement for a plan led system is clearly set out in the Draft Development Plan regulations (Part C para 6). The 1st sentence of Part 1 (page3) of the Draft NPF4 states that *'The purpose of planning is to manage the development and use of land in the long-term public interest'*. This statement is also set out in the Draft Development Plan regulations (Part C para 5 and 9). This matter is adequately covered in the Draft NPF4 and Development Plan regulations and there is no requirement to repeat this under Policy 1.

However, if this policy is to be retained the language should accord exactly with the Development Plan regulations, which currently it does not. Change 'should' to 'must' and include linkages to the 4 spatial themes and 6 spatial principles. With the climate and nature emergencies that are the guiding principles of the Draft NPF4, this first policy needs to be ambitious with definite national aims and requirements for planning. It needs to set out ambitious targets and the detailed steps and requirements that are needed if we are to fully address these emergencies.

Policy 1 states that it is the role of LDPs to fulfil this function. However, as explained above this is the core purpose of planning and it is clearly more than just the role of LDPs. This is also a requirement of NPF4.

The phrase *'long term public interest'* should be clarified. Scotland's national outcomes should be listed.

It is difficult to see how Development Management would use this policy in assessing planning applications.

There is room for confusion between the terms plan-led approach, place-based approach and design-led approach; the term design-led approach also appears in the universal policy section under *'Policy 6: Design, Quality and Place'*. Neither term is referenced in the glossary, a review of the document to capture all terms suitable for the glossary would improve NPF4.

Policy 2: Climate Emergency**Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?**

We welcome the emphasis on the climate emergency and the important role planning plays in tackling the issue. This is an ever increasingly complex area of partnership working across a wide range of stakeholders and this needs to be set out in a clearer way. There is a need for stronger integration of key plans, policies and strategies to ensure that actions and investment in relation to housing, planning, economy, transport, natural resources and energy, are aligned towards promoting decarbonisation if carbon emissions are to reach net zero. Policy 2 needs to set out ambitious national targets and requirements for reaching net zero.

2a – this is a principle and should be removed from the policy and referred to in the supporting text. How would an applicant outline how their proposal does this? If retained Change 2a to read ‘...significant weight ~~should~~must be given to the Global Climate Emergency.’ Language needs to be stronger.

2b - Change to read ‘All development ~~should~~must be designed to minimise emissions...’. Language needs to be stronger.

The use of the word ‘*Significant*’ weight in 2a and 2c needs to be clarified. There needs to be detailed guidance on this as to at what level they are considered significant. Lack of detail here will lead to varying interpretations and wide differences in approach across the country.

2b, c and d of this policy requires technical knowledge of the process of assessments for calculating both the whole life of green-house gas emissions and any subsequent carbon off-setting. This is a complex area that has resource implications for planning services which may not have the in-house expertise to make these calculations. What information/evidence is required to be submitted by an applicant for e.g. in a whole life assessment or a viability assessment? More detail on requirements should to be included and considered here, as well how and by whom this should be assessed. This adds greater complexity to assessing planning applications in particular which will impact on key performance timescales, resourcing and require upskilling of Planners and the Development Industry.

2c states ‘...*evidence that this level of emissions is the minimum that can be achieved for the development to be viable...*’. What are the minimum levels of acceptance? These could be very different depending on the use. This could be viewed as a developer ‘get out clause’ and could undermine part 2a and the significant weight to the Global Climate Emergency.

2c ‘*Development proposals for national, major or EIA development should be accompanied by a whole-life assessment of greenhouse gas emissions..*’. Should all proposals not be subject to these requirements as introductory text states that ‘*universal policies should apply to all planning decisions*’? Proportional supporting evidence should be submitted as outlined in supporting NPF4 guidance.

Emissions off set measures – it is suggested that sufficient measures should always be provided on site as an integral point of the development, with the assurance that this will be maintained long-term by the developer, otherwise the development should be considered unacceptable.

How does the planning service monitor the impact of proposals post development? This will require ongoing monitoring, inspection and enforcement regimes to ensure compliance with policies.

Links to the role of Building Standards and legislation would have been helpful as there is overlap between the roles of the planning service and building standards.

2d ‘*Proposals to sensitively incorporate climate adaptation and mitigation measures for existing buildings, infrastructure and spaces, should generally be supported*’ – this is a wide and bold statement to include here... design for climate adaptability is only one aspect of a proposal that needs to be assessed. A proposal that is designed to be adaptable to future impacts of climate change could be completely contrary to many other aspects of the plan. Suggest rewording or linking to other sections and policies which would also need to be considered.

Lack of inclusion of biodiversity is a significant omission.

Policy 3: Nature Crisis**Q25: Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?**

We welcome the emphasis given to biodiversity. The policy encourages a shift from protection to enhancement and biodiversity gain. However, there is no mention of biodiversity net gain. Consideration also needs to be given to funding and delivery. Reference should be made to the need for ongoing future management of these enhanced or created networks. This is likely to have significant ongoing resource implications for authorities whose budgets in these areas are already overstretched. NPF4 will require a change in thinking and collaborative working, to maximise the benefits of biodiversity enhancements for all. This will include additional training and upskilling; and better databases of new and existing habitats and projects to facilitate a joined-up approach.

The policies appear robust in terms of ensuring biodiversity gain where development occurs but their impact could be increased further by stating the connection between nature-based solutions and other policy. In particular policies 12, 13, 14, 32, and 33 overlap with universal Policy 3. Better cross referencing would make these links implicit. There also needs to be stronger link with blue and green infrastructure.

Nature Scot are currently consulting on the '*Draft Developing with Nature Guidance*' which will support Draft NPF4 policy 3(e) on securing positive effects for biodiversity, in particular from local development. It has been prepared and published to inform understanding of the intended approach set out in the Draft NPF4, and it is suggested that the approved NPF4 includes a reference and link to the finalised guidance document.

Climate change has exacerbated the impact of habitat loss and the fragmentation of existing biodiversity. Green networks are important for wildlife, recreation and travel; and woodland creation can help absorb carbon dioxide and slow down the rate of water movement into burns and rivers, helping to reduce flooding in built-up areas. Using trees and other forms of green infrastructure to reduce urban temperatures can also bring multiple benefits for health and wellbeing. However, encouraging developers to incorporate green infrastructure and nature-based solutions into new developments is a key challenge, particularly if there is a perception that it may be more time consuming and/or costly to do so and land intensive. Sadly, all too often green infrastructure is an afterthought in the design process. Again, reference should be made to the need to maintain these enhancements in the long term.

Definition of biodiversity enhancement and how this can be measured would be helpful. The creation or enhancement of biodiversity networks should be considered as part of the infrastructure first approach.

The Policy does not suggest or require the use of a biodiversity net gain (BNG) metric to establish and measure the biodiversity condition of a site before and after development. A metric has the advantage of being both transparent and measurable, it would provide developers with a degree of certainty during the production of material for a planning application. There are already some major house builders using a BNG metric to inform their development proposals. A suggested metric would provide consistency of approach across Scotland as it is likely that planning authorities will need some sort of credible methodology to successfully deliver the policy. This BNG metric does need not to be set in stone, and could sit in either guidance or possibly within the Regional Spatial Strategy but a suggested methodology would support effective delivery of a cornerstone policy. Furthermore, a metric might be of use during the identification of sites during the LDP process.

A lot of use of 'should' throughout the policy. Language requires to be stronger. Does an application have to meet all the criteria – this is not clear.

3a – Policy should seek to '*protect and enhance*' biodiversity enhancement not 'facilitate' it. Should this refer to LDPs rather than development plans?

3d - Should all proposals not be subject to these requirements as introductory text states that 'universal policies should apply to all planning decisions'? Differential approach to major and local applications (parts d & e) isn't practical. All development should conserve and enhance biodiversity.

3e – proposals should '*protect and enhance*' not just enhance biodiversity.

Landscape impact and landscape assessments should be mentioned.

How do we demonstrate that biodiversity will be in a better state than without intervention?

Assessing these requirements will require additional resources for Planning Authorities.

Policy 4: Human rights and equality

Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

The Equality Act 2010 places a duty on local authorities to advance and address issues concerning human rights, equality, and discrimination. The Fairer Scotland Duty also requires local authorities to consider how they can reduce inequalities. These assessments must be undertaken to support the preparation of the LDP.

We recognise the importance of human rights and equality; however, these areas do not translate into a workable policy tool against which to assess a planning application. Human rights and equality are a broad objective of the planning system and should remain a focus of LDP preparation rather than for planning applications. They are addressed in other legislation and the Draft Development Plan regulations. Policy 4 should be removed with this issue outlined under the introductory text to Part 1 of NPF4. A simpler solution would be to provide clearer guidance on preparing a LDP equalities assessment and how development management should apply guidance for planning applications.

The inclusion of this policy may lead to increased levels of objections to development on breaching human rights rather than the planning merits of the proposal.

Policy 5: Community wealth building

Q27: Do you agree that planning policy should support community wealth building, and does this policy deliver this?

The inclusion of Community Wealth building is welcomed and is a concept which is considered in East Renfrewshire Council's LDP2 which requires major developments to contribute to employment, training and training opportunities.

The Draft NPF4 does not define community wealth building. A definition of the concept and how it is to be measured would be helpful.

The wording here is very vague. How would you assess a proposal against this policy? What criteria should be included when assessing whether a proposal for a national or major development contributes to community wealth building objectives? And to what extent /level does it need to contribute? Without more detail this would be very widely interpreted.

5a – should this refer to LDPs rather than development plans?

Should all proposals not be subject to these requirements as introductory text states that ‘universal policies should apply to all planning decisions’?

Policy 6: Design, quality and place

Q28: Do you agree that this policy will enable the planning system to promote design, quality and place?

We support the general thrust of this policy approach and particularly the inclusion of the 6 qualities of Successful Places. The refresh of the six qualities of successful places is welcomed, the revised criteria reflect the widening scope of planning to include the public health agenda. The six qualities effectively cross- reference the many areas of policy overlap; health, sustainability, design, biodiversity etc.

Design concepts and theories have moved on considerably in the last decade and this progress and thinking needs to be reflected in the Draft NPF4. Policies referred to in older documents need to be urgently updated. e.g., Creating Places 2013 and also Designing Streets 2010. While there is still merit in these older documents, they do not incorporate newer concepts such as net zero, nature positive or the circular economy.

6a – should specifically reference addressing climate change and nature recovery – this would link strongly with the primary guiding principles of the Draft NPF4.

NPF4 needs to focus first on how places function, rather than simply how they look.

It is disappointing that green infrastructure has not been highlighted as an integral part of the design process from the outset. This would have provided stronger links to the other universal policies.

Recognition of local standards should be acknowledged in the Draft NPF4.

How can a ‘*sense of joy*’ be measured or assessed?

20-minute neighbourhoods should have been included under this policy. Policy 7 ‘Local Living’ should be merged into this wider design and place policy approach.

Liveable Places

Policy 7: Local living

Q29: Do you agree that this policy sufficiently addresses the need to support local living?

We support and welcome the 20-minute neighbourhood concept. The importance given to 20-minute neighbourhood in the development of new LDP’s is noted and supported. We are supportive of the flexibility to adapt the principle to local circumstances and characteristics.

The approach may be easier to apply in new development but to retrofit the concept in existing places requires much work outside of the planning system.

We feel that Policy 7 should be merged with Policy 6 as stated above and does not require a policy in its own right.

There also needs to be more emphasis on rural situations where place making contexts are different to larger urban areas.

This principle can only be delivered through collaborative working across Council services and external stakeholders. We are supportive of the co alignment of departmental strategic plans and funding sources to deliver on this principle.

We are supportive of co-locating uses and planning development near public transport links to reduce car travel - 20-minute neighbourhoods. COVID-19 has accentuated the benefits of having everything within walking distance of home.

Final sentence of Para 3 *states 'Retrofitting facilities in areas which are predominantly residential should also help to reduce the need to travel'*. This will be challenging where urban areas are densely built up and lack available land/space to provide new facilities.

The 1st sentence is unclear and should be deleted. If retained the reference to 'decision makers' should be changed to the Planning Authority.

7a suggests that LDPs should bring together relevant policies in this NPF to promote development. This is unclear.

7b – what is a relevant development proposal? This should be clarified. Part b also lists 9 criteria which consideration should be given to. How many criteria does a proposal have to satisfy and at what point would a development comply or not? This is particularly relevant for rural areas. Consideration also needs to be given to the quality of facilities and to the frequency of public transport not just quantity and accessibility to them. In addition to 'local shopping areas' we would add the importance in having places for businesses to provide circular economy services (repair, reuse, refurbish, refill) and sharing economy to tackle unsustainable consumption.

Although the focus is on local living, there should also be acknowledgement that for many there will be regular occasions where travel beyond immediate neighbourhoods is required. For example, you are not necessarily going to have a hospital within your immediate neighbourhood. Unfortunately, in many areas, access to adequate sustainable transport options for such travel is still extremely limited. It would be beneficial for NPF4 to provide a commitment to increasing sustainable, and importantly affordable, public transport options across Scotland. Until these options are in place and available to people, it is going to be very difficult to encourage a move away from the heavy reliance on the car for these essential journeys out with immediate neighbourhoods.

Policy 8: Infrastructure First**Q30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?**

We would agree that infrastructure considerations should be at the heart of planning and place making. We also support the desire to move to a more sustainable use of infrastructure, making better use of existing assets and prioritising low carbon infrastructure. The onus is now on LDPs to take an Infrastructure First approach with delivery programmes and responsibilities clearly set out. The provision of functional, serviceable, safe and maintainable infrastructure to support existing and future development is a key element in delivering successful sustainable communities.

An infrastructure first approach will require a different way of thinking and working with stakeholders. Multi-agency partnership and collaborative working with Key Agencies, infrastructure and utility companies, education providers, the development industry, community organisations and other technical bodies and stakeholders will be critical.

Development plans should continue to be recognised as a mechanism for the development industry to gain clarity and certainty to inform decisions regarding land acquisition and development. They should be supported by the development industry and seen as a tool to facilitate the delivery of infrastructure and the creation of new places.

We agree that there is a need for a robust evidence base on infrastructure capacity, condition, needs and deliverability to inform the LDP and its spatial strategy. There is however some concern as to whether the detailed information required will be available from landowners, developers and infrastructure providers at an early stage. To what level of detail LDPs can set out early the full infrastructure requirements, delivery responsibilities, mechanisms and related developer contributions, will depend on the availability of this information.

Clarity is required as to whether the 2nd bullet in the 1st Para refers to an evidence base of existing infrastructure including capacity, condition, quality etc across the Local Authority area.

It will be critical for the development industry to work with Local Authorities and service providers in delivering an infrastructure first approach and factoring this into their future investment decisions and negotiations on land purchases/option agreements. This should reduce debate on the level of contributions at planning application stage and the perceived viability of proposals.

We supports the linkages to other national infrastructure strategies; however it would be useful to have further detail within the NPF itself

It would have been helpful for the Draft NPF4 to set out and define what is meant by infrastructure. Additionally, acknowledgment of a green infrastructure approach at the outset of the design process would ensure stronger links to the universal policies and help deliver on the climate change and nature recovery aspirations of the Draft NPF4. One of the biggest barriers to low carbon development is the funding of new infrastructure. If homes are to be affordable as well as attractive, it will be vital to find ways of cutting both the long-term running costs and the up-front infrastructure costs.

It should be recognised that infrastructure delivery will rely on an elements of public sector front funding some infrastructure such as schools with this regrouped through S75 agreements / other legal mechanisms.

Fundamentally, there is still a serious mismatch between funding streams for this to be an effective approach unless the Scottish Government can commit to more certainty and intervention when funding is beyond the scope of Councils and developers.

The cumulative impacts of proposals on infrastructure should have been mentioned.

8c - This is a wide statement without linkages to other sections and policies that need to be considered in association with this.

8d – Text should be changed to read 'the relevant tests ~~should~~ must be met'. The relevant tests should be set out in the Draft NPF4 or cross references to the relevant circulars should be included.

Policy 9: Quality homes

Q31: 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?

We welcome the concept of Quality Homes and support the move to a more flexible and locally based approach to the new Minimum All Tenure Housing Land Requirement (MATHLR). Successful place-making is about more than numbers and we hope this approach will reduce the time and resources spent on debating housing numbers and allow a greater focus upon the delivery of high-quality homes across all tenures and the creation of well-designed sustainable places and environments that support healthy lifestyles and contribute to well-being.

9d – We welcome the link here to the six qualities of successful places. However, this issue should be the first bullet point to emphasise the importance of design and in particular a green infrastructure first approach. This would link better with the wider ambitions of the Draft document.

This is a long and detailed policy that may be better suited to be separated into multiple smaller policies.

The policy is not sufficiently clear to the requirements for allocated sites and windfall sites that may come forward. This is a significant issue with how this policy is currently worded.

We welcome the ongoing consultation exercise with the Scottish Government in setting the MATHLR. Annex B sets out the 10 year Minimum All Tenure Housing Land Requirement (MATHLR) for each local authority area. For East Renfrewshire the MATHLR is shown as 2800 additional homes over a 10-year period which averages at 280 per annum.

However, the MATHLR process does not recognise the role of regional and local housing markets sufficiently and how markets operate cross boundary. This process was more appropriately achieved through regional partnership working through SDPs and should remain a function of the RSSs. Reservations also remain about the use of flexibility as well as the setting of minimum land requirements. This is inappropriate especially in areas of pressured market demand and where there are environmental and other constraints, such as East Renfrewshire. The policy context should not constrain the ability of authorities to set a housing land requirement appropriate to local circumstances. It is suggested therefore that the term '*Minimum*' should be removed from the national policy context. There is already considerable contingency and generosity built into the figures to meet need and demand. With the removal of flexibility, the appropriate housing requirement for the East Renfrewshire Council area would be 2300 over the 10-year period.

The level of resources required to deliver the East Renfrewshire MATHLR and required new infrastructure will be significant. Particularly would be the impact that this level of delivery would have on our existing education estate (much of which is already at capacity) and the number of new schools, early years and Additional Support Need facilities that would be required. When added together, the number and level of different infrastructure needs associated with this size of release could create viability issues. Health and care facilities are also under pressure. Lead in times for larger sites with phased affordable housing delivery from LDP adoption to delivery on the ground can be substantial - this can be circa. 4-5 years or longer for larger, more complex sites which require significant upfront infrastructure and capital investment.

Brownfield first and reusing vacant and derelict land should be emphasised within the Policy.

There needs to be more consistency of wording - Reference should remain throughout to high quality homes, rather than switching between good, better and high.

9a - We welcome the emphasis that the *'delivery of more and better homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities....'*. As outlined previously in this response reference to the right development in the right place should have been clearly stated in the National Spatial Strategy Section.

9a – It is confusing to refer to a housing target and housing requirement in the same sentence. The Local Housing Strategy (LHS) is required to provide a housing supply target but LDPs no longer do.

9a - *'..longer term deliverable sites can be brought forward'*. This should include the word 'allocated' to ensure non allocated sites do not prejudice the delivery of allocated housing sites.

9b - We support the principle of a housing land pipeline that identifies programming of sites over the short, medium and longer term periods. References to *'Locations that may be suitable for new homes beyond the plan period can also be identified'* should be clarified. Only sites that have been fully considered by the Council and identified as suitable deliverable future residential opportunities (yet are not required to meet current needs) should be identified beyond the plan period. The words *'may be suitable'* should be removed. Otherwise, what status would such sites have and what level of scrutiny or assessment would have been undertaken?

9b- We support the removal of sites where they are no longer deliverable.

9b - The Delivery Programme and Housing Land Audit should be used to *'monitor'* not *'manage'* the development pipeline. Replace 'manage' with 'monitor'.

9c - We welcome that land should be allocated to meet the HLR in sustainable locations.

9c - We support the principle of 20-minute neighbourhoods but this may not be practical for all sites or to retrofit facilities and services into existing established residential or urban areas where available space is at a premium.

9c - *'Diverse needs and delivery models should be taken into account across all areas, as well as allocating land to ensure provision of accommodation for Gypsy/Travellers and Travelling Showpeople'* add in text at the end of the sentence ... 'where the need has been identified'.

9e – There is potential for this to be mixed up with existing requirements for community benefits linked to public sector procurement. Consideration should be given to a different name for the statement – e.g. Meeting housing and community needs?

9e - Would the need for evidencing housing requirements or infrastructure upgrades be needed for an allocated LDP site where these considerations may have already been discussed or identified through a development brief for e.g. Clarification on this matter is required.

9f - It would have been helpful if the Scottish Government acknowledged that research would be undertaken on future provision of percentage requirements for wheelchair homes. Policy does not go far enough to meet the housing needs for older people and disabled people.

9h – This is a significant change to previous policy requirements in that it refers to support for affordable housing proposals where there is an identified requirement but also states that *‘Proposals for market homes should generally only be supported where a contribution to the provision of affordable homes on a site is at least 25% of the total number of homes.’*, indicating the introduction of a blanket minimum 25% affordable housing policy. We are generally supportive of this approach. Clarification on the term ‘areas’ is required. Does this refer to the Local Authority or smaller housing market areas?

9h - Although we generally agree that the contribution should generally be for serviced land within a site to be made available for affordable housing, there should either be more detail here, or reference made to PAN 2/2010. If there is to be no reference to PAN 2/2010 it is important to reference that land can be transferred either at a value relating to its end use for affordable housing or by agreement between the developer and the RSL or local authority, at a lower value. In any event it should be transferred at less than the value for mainstream housing for sale. In addition, it is important to reference the contributions that other contributions can make to the delivery of affordable housing, e.g. commuted payments, off site provision or provision of completed units on site.

9i- We support emphasis on the primacy of the development plan and on not supporting proposals on land not identified for housebuilding in the LDP. However, the 1st exception effectively states that although the housing requirements of the MATHLR are being met (which includes 25% flexibility) additional land should still be approved. This runs contrary to a plan led infrastructure approach to development and the overarching principles of climate change and nature recovery. NPF4 should acknowledge that Planning Authorities have limited control over when and how quickly that sites are built out. We can allocate land but not control delivery.

9j – Further guidance is required for the last bullet, in what would be accepted as being an adaptation in response to risks from a changing climate, as otherwise this could be open to wide interpretation by householders? Generally, all new houses should be built to lifetime home standards – suitable for adaptation for a range of needs that may emerge over the lifetime of the occupants. Suggest further enhancement of existing building standards.

9j – householder applications should be dealt with through LDP design policies and are not needed in a national planning document.

Further linkages between policies should be included throughout.

Policy 10: Sustainable transport**Q32: Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?**

We are supportive of the emphasis of this policy on promoting sustainable transport and active travel. This is relevant to East Renfrewshire where car ownership rates and usage is high. However, this is a detailed and complicated policy which may have been better suited as separate policies.

We are supportive of the continued emphasis on the concept of 20-minute neighbourhoods.

The role of Regional Spatial Strategies in coordinating travel at a City Region level is absent. This is especially important in the Glasgow City region where much travel is cross boundary and public transport is coordinated by the Strathclyde Partnership for Transport (SPT).

Guidance referred to in this policy is also outdated (Development Planning Transport Appraisal Guidance 2011) and in need of much revision due to the research data now available on decarbonisation, travel choices, personal mobility etc.

Policy refers to transport infrastructure capacity throughout. It would have been helpful to link this back to *Policy 8 'Infrastructure First'* approach and that upgrades to infrastructure resulting from development are provided in accordance with this policy. Linkages to the climate change and nature/green infrastructure policies etc. would have been useful. There is general feel of disconnect here. There is also no indication provided that existing road transport infrastructure would require substantial redesign to address current policy priorities in terms of promoting sustainable and active travel, enhancing vitality, liveability and well-being, and supporting carbon reduction policies.

The sustainable transport hierarchy should be set out in a diagram within NPF4.

10a *'Local development plans should aim to reduce the need to travel unsustainably by prioritising locations for future development that can be accessed by sustainable modes'*.. We agree with the principle behind this, however, this is an aim for the LDP and is not required in the policy. This would be done through a LDP site selection exercise. The 2nd sentence of 10a regarding the requirement for a transport appraisal is repeated in 10b. 10a should be removed.

The Draft NPF4 also needs to acknowledge that is likely to be challenging for some suburban areas with limited brownfield land. In these areas, with significant housing requirements, in many cases there will be no choice but to look to green field releases on edge of existing settlements. These locations are unlikely to be close to existing rail lines / stations and bus services in many areas are already greatly reduced / extremely limited. Planning cannot reduce the need to travel on its own. Although we can liaise with partners to try and encourage enhanced multi-modal transport provision, ultimately the local authority has no control over public transport provision in our area. Making public transport more attractive through investment and reduced pricing would assist in reducing the need to travel by car. Public transport services are privately run and require a continued level of use to continue. Consideration also needs to be given to the quality the frequency of public transport not just quantity and accessibility to them. Likewise, there is limited emphasis on high quality, coherent and attractive active travel infrastructure to facilitate a modal shift away from private car for shorter journeys. In this respect, greater emphasis on the role of walking, cycling and wheeling networks, urban mass transit network and improved regional coordination would help support realistic delivery within a local context.

10b – reference should be made to cross boundary movement and partnership working through the RSSs.

10d - Clarification on ‘*significant travel generating uses*’ would be helpful.

10c and d - Clarification on ‘*significant*’ would be helpful.

10g – we welcome emphasis on people and place before unsustainable travel and inclusion of blue/green infrastructure. However, the wording should be stronger to require design and green infrastructure as an integral part of the design process from the outset. Policy 6 ‘Design, Quality and Place’ should have been cross referenced to.

10h - 2nd bullet refers to access to local facilities walking or wheeling more than 400m, however, policy 7 ‘Local Living’ and the 20-minute neighbourhood principle refers to 800m. Consistency of wording is needed.

10i – Support for electric charging infrastructure is welcomed. However, there is a need for a coordinated approach for delivery of charging infrastructure for all types of development. More detail and national requirements/standards should have been provided on this critical and very topical area.

10k - does the reference to equalities legislation mean that Local Authorities must assess every planning applications against this legislation?

10L – all cycle parking should be sheltered, secure and accessible. 10L also refers to ‘*existing nearby provision*’. How is this measured, how far is nearby etc. This statement should be clarified.

10m - we are supportive of the concept of reducing car parking standards in accessible urban locations.

Limited mention of parking requirements generally.

There are a number of elements missing from the policy including: Mobility hubs; core path networks; and the role of Local Authority Local Transport Strategies and Active Travel Plans.

Policy 11: Heat and cooling

Q33: Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

We support the role envisaged for Heat Networks Partnerships and sees this as a critical cross-cutting role but Draft NPF4 should go further and be more ambitious in looking towards a whole systems approach to energy.

It should be recognised that these partnerships may require cross boundary working and a spatial framework would be useful to identify suitable locations.

Little detail on how this will actually be achieved and funded.

Linkages to building standards legislation would provide a more robust policy.

Policy should require applicants to consider district heating at the outset of the design process and consider if sites can be linked to make heat networks viable.

We support the alignment of the LDP with LHEES provisions. More guidance on this matter would be helpful.

Policy 12: Blue and green infrastructure, play and sport

Q34: 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?

We support the emphasis placed on blue and green infrastructure and particularly the elements related to children's play and its integrated design. These are seen as key strands in the protection of natural resources and investment in new facilities which will provide opportunities for improving health and wellbeing.

The policies are detailed and comprehensive, however, and could be separated into 'Blue and Green Infrastructure' and 'Play and Sport'. This would provide a more useable policy framework for both themes.

There is considerable ongoing work across the Glasgow City Region (GCR) to create high quality blue/green infrastructure at regional scale. Initiatives such as the GCR blueprint for a new green/blue network could be referenced to reflect the regional nature of much of the work, and the important role for the new RSSs to play in directing and coordinating new blue/green infrastructure.

It is disappointing that green infrastructure has not been highlighted as an integral part of the design process from the outset. This would have provided stronger links to the universal policies.

Enhancing habitats and biodiversity, ecology and biodiversity net gain should have been included in the policy.

12a – Clarification on the phrase '*strategic and local scales*' – does 'strategic' mean regional or national? '*Development allocations should be chosen taking account of the areas that can best contribute to enhancing and delivering key green networks and priorities*'. The policy needs to quantify those areas also need to be in sustainable accessible locations and in accordance with the Plans spatial strategy.

12h – remove '*wherever possible*' from the 1st sentence.

12i – all developments should provide provision for play, recreation etc, appropriate to scale of the development, and not be restricted to major developments only.

12j – cross reference is required to Policy 6 and the 6 qualities of Successful Places.

12k – trees and greenery - New planting must promote and enhance the biodiversity of the area and incorporate native trees where appropriate.

12l – 2nd sentence - Remove '*wherever this is necessary*'. Maintenance requirements and arrangements must be set out, including who is responsible for these requirements. Consideration needs to be given to funding, delivery and long terms management of this infrastructure.

Policy should reflect the requirements for flood protection/mitigation.

Lack of mention of role of Open space and Play Sufficiency Strategies.

Policy should mention the role of Sustainable Urban Drainage Systems (SUDs) as part of a multifunctional approach to landscape design.

Policy 13: Sustainable flood risk and water management

Q35: 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?

The policy on flooding and water management and the principle of flood avoidance is supported.

There is an opportunity to expand on 13 (h) and develop a policy that recognises that natural flood prevention can deliver wider benefits in terms of the nature crisis, habitat creation, high quality places and better greenspaces.

The management and control measures for mitigating future flooding episodes is a critical element in the climate emergency and it needs to be given greater priority and resources.

The policy fails to mention the impacts of land raising; requirements for Flood Risk Assessments (FRA).

13a - reword to refer to a precautionary approach rather than a cautious one. *'New development proposals in flood risk areas, or which can impact on flood risk areas, should be avoided and informed by a Flood Risk Assessment'.*

13f - Development proposals, should be required to integrate well-designed and naturalised Sustainable Urban Drainage Systems (SUDs) features, to manage drainage and water quality. Integration of SUDs with green infrastructure should be acknowledged.

Policies 14 and 15: Health, wellbeing and safety

Q36: Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

The statement that the provision of health and social care facilities and infrastructure to meet the needs of the community should be a key consideration is welcomed. We recognise the strong linkages between mental and physical ill health, well-being and land use planning. Health and wellbeing should though be recognised as a core component of the Draft NPF4, and included within the universal policy section.

The inclusion of the health agenda into planning policy is welcomed, reflecting as it does recent research into the Glasgow effect and the important role place plays in determining health and life outcomes. The links and over-laps with policies 3, 6 and 7 which support 20-minute neighbourhoods and nature recovery could be made more implicit.

The role of Planning Authorities in assessing Health Impact Assessments (HIA) needs further clarity as it may well require further upskilling of staff and new areas of expertise to be developed. Clarity on what should be included within a HIA would be helpful.

14a – securing health facilities and forecasting future demand for healthcare infrastructure is challenging and should be acknowledged in NPF4.

14c – reference to air quality assessments is missing and should be included.

14d – no mention of ‘*agent of change*’ principle. Where areas already have an unacceptable noise level it may not be possible to mitigate the adverse effects of noise. In such circumstances noise sensitive development, such as new residential development, may not be appropriate.

14 c) and d) inconsistency in wording - in both cases the wording should state ‘*should not be supported*’?

14e – We support the inclusion of food growing and allotments. Linkages to the Food Growing Strategy would be helpful. This would sit better within the green infrastructure policy areas.

We generally welcome Policy 15 on Safety. Safety is not just a consideration for major accident hazard sites. Policy could be widened.

Productive Places

Policy 16: Land and premises for business and employment

Q37: 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?

We welcome the emphasis on allocating employment land, infrastructure and investment which supports a greener, fairer and more inclusive wellbeing economy.

A definition and method for calculating ‘*net economic benefit*’ would be helpful. What information/evidence is required to be submitted by an applicant to demonstrate this? This would assist Local Authorities in determining applications and help applicants submit required information. It is questionable whether net economic benefit is required on an allocated economic site?

A definition of a ‘*wellbeing economy*’ should be added to the glossary.

16c – policy should acknowledge the importance of high quality digital and full fibre broadband infrastructure as this can help transform our working, learning and leisure environments, and provide opportunities for homeworking, which in turn has the benefit of helping reduce the need to travel and a reduction in emissions.

There is a risk that 16f could undermine economic allocations in the LDP and direct development to unsustainable locations. Additionally, the policy should refer to proposals demonstrating that they will not negatively impact upon existing allocated economic LDP sites.

16g – do these criteria relate to both LDP allocated sites and windfall sites? Impact upon amenity and character covered in parts d and f. Cross reference to Policy 6 would be helpful.

Policy lacks protection for allocated sites from alternative uses.

Policy focuses on new proposals but fails to acknowledge existing business areas and uses and the challenges they face in modernising and adapting to meet climate change objectives.

No mention of creation of local jobs, community benefits or community wealth building within the policy. These are referenced within Policy 17 and should also be included under Policy 16.

Insufficient mention of addressing economic inequalities.

It would be useful to add the importance in having places for businesses to provide circular economy services (repair, reuse, refurbish, refill) and sharing economy.

Lack of acknowledgment of cross boundary impact and how this will be measured.

Policy 17: Sustainable tourism

Q38: 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 netzero and nature commitments?

We support the policy emphasis on sustainable tourism whilst recognising the conflicts and tensions between the environment and the economy. Net zero ambitions are not addressed strongly enough within the policy.

No mention of facilities being accessible by a range of sustainable transport options and connections to active travel routes.

We support reference to local employment and community wealth building.

No mention of impact upon landscape or natural environment.

17g should be amended as follows – ‘*Development proposals for tourist facilities ~~should take into account~~ will be required to demonstrate:*’....

Definition of a ‘tourist facility’ would be helpful.

Policy 18: Culture and creativity

Q39: Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

The introduction of culture and creativity into planning policy is welcomed, however, we recognise the practical issues faced with making provision for public art and encouraging creative and cultural issues.

No mechanism is provided for delivery of public art in public places, it is envisaged that within East Renfrewshire the requirement for any art work would be identified in planning briefs, town centre action plans and local place plans.

Agent of change principle should cross refer to Policy 14 on noise issues.

Policy 19: Green energy

Q40: 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?

The opening statement should clarify that onshore wind will be the predominant form of green energy within the parameters of NPF4 and the Scottish planning system. Off-shore wind energy, regulated by the separate statutory marine planning process will be the predominant form of green energy across Scotland as a whole.

19a – how do we define or measure that an ‘*area’s full potential for electricity and heat from renewable sources is achieved*’? Does ‘area’ refer to local authority boundary or particular landscape areas or regional areas? Clarification is required. Also, what is meant by full potential?

19a should acknowledge that consideration also needs to be given to environmental, community and cumulative impacts of proposals. There is no mention of the requirement for Local Authorities to prepare a spatial framework for wind development or capacity assessment as required by the current SPP or a spatial framework for any type of green energy. If local authorities are not to prepare a spatial framework search areas or an alternative mechanism should have been set out in the Draft NPF4 or clarification provided as to how requirements are to be met. As it stands it is difficult to see how the policy will address strategic cross boundary considerations.

19b - should cross refer to the criteria in 19k

19d should acknowledge the sensitivity of local heritage designations. ‘*Unacceptable impacts*’ requires further clarity.

19e – we agree with the principle to ‘*repower, extend and expand existing wind farms*’, however, policy should clearly cross refer to the capacity of the landscape and its potential to accommodate additional capacity.

19h - Definition and method of preparing a ‘*decarbonisation strategy*’ would be helpful. What information/evidence is required to be submitted by an applicant to demonstrate this? This would assist Local Authorities in determining applications and help applicants submit required information.

19f – ‘*small scale renewable energy generation technology*’ – term requires further clarity.

Greater emphasis should be given to the future role of hydrogen.

Policy 20: Zero waste

Q41: Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

The requirement for LDPs to identify new locations for new infrastructure and support development in line with the national hierarchy is supported.

Further clarity on how LDP policies are to consider the following statement would be welcome in the policy detail: ‘*All developments should aim to use materials with the lowest forms of embodied emissions. Materials should be suitable for reuse with minimal reprocessing. The use of previously used, sustainable, local, recycled and natural construction materials that also store carbon, such as timber, is encouraged. Construction and demolition methods should minimise emissions as far as possible.*’ How are assessments to be made on this basis?

This is a cross boundary issue and this also needs to be acknowledged.

Policy 21: Aquaculture**Q42: Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?**

No specific comment

Policy 22: Minerals**Q43: 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?**

This is specialist area of planning requiring specific skill sets and expertise.

22a – ‘10 year land bank’ – this is a strategic issue best identified through the RSS. Clarity required on what is the ‘*relevant market area*’. There will be a continued required for partnership working through the RSS.

22b – we welcome that that the extraction of fossil fuels is not supported except in exceptional circumstances. This needs further clarity and better definition to assist the development management decision making processes.

22c- ‘*unconventional oil and gas*’ – clarity required.

There is no consideration in the policy for supporting the processing of secondary aggregates, which would support policy 20 (Zero Waste).

Policy 23: Digital infrastructure**Q44: Do you agree that this policy ensures all of our places will be digitally connected?**

The requirement for development proposals to incorporate appropriate, universal and futureproofed digital infrastructure is welcomed. However, the policy does not provide sufficient detail and information on requirements to ensure consistent assessment of proposals and to ensure the provision of high-speed quality digital infrastructure in new development.

23b should be clear that digital infrastructure must be provided at as an integral part of the development and at the outset. Replace ‘should’ with ‘must’. ‘*Universal and futureproofed digital infrastructure*’ – clarity on this phrase is required.

Policy should cross refer to home working and local living aspirations.

Delivery will require partnership working with service providers and understanding of any expansion and roll out plans. This concept needs to be supported by sufficient investment.

Distinctive Places

Policies 24 to 27: Distinctive places

Q45: Do you agree that these policies will ensure Scotland's places will support low-carbon urban living?

We are generally supportive of the aims of Policies 24 to 27 which promote mixed-use city, town and local centres, which are easily accessible by sustainable transport modes, and allowing communities to have easy access to the goods and services they require. The policies link strongly to the 20-minute neighbourhood concept. Town and local centres are key components of 'liveable places' and key to achieving 20-minute neighbourhood implementation. The 20-minute neighbourhood concept strengthens the role of planning in supporting successful town centres.

It is noted that there have been strong town centre first policies in place for a number of years but these have not arrested the decline of many town centres. The recent relaxation of development management for pandemic measures such as outdoor seating is not mentioned and could have provided a measure of continuing support.

Definition of '*local centres*' and '*neighbourhood shopping*' would have been helpful.

24a – The appropriate method to identify a network of centres is through the RSS to allow for consideration of wider retail markets and trends and cross boundary movement.

25a – While we support movement away from out-of-town locations, consideration also needs to be given to what impact this will have on existing established out of centre locations with the potential creation of increasing numbers of future vacant units. What will happen to such locations without support?

25c – what level of clustering is deemed unacceptable – clarity is required.

26 - The policy appears to contradict Policy 25 (a) Retail '*out of town developments will not be supported*'. Policy 26 still allows out-of-centre development where conditions permit – '*considered acceptable in out-of-centre locations*'. It is recognised that the policy is trying to distinguish retail from other uses, such as commercial leisure facilities, but footfall will be generated for both types of use should a person be shopping or going to a cinema. There could be negative impact on net-zero and 20-minute neighbourhoods and the use of the private car over sustainable transport modes. To protect against this 'out of centre' requires careful definition.

26b – Reference is made to '*network of centres identified in the development plan*' – should this read '*identified in the LDP*' as the development plan is NPF4 and the LDP?

26 b - remove '*where possible*' from the second sentence – this is unnecessary. Clarity on what information should be submitted through the '*town centre first assessment*' and '*economic impact*' would be helpful.

27a – we are supportive of the principle of residential development in the town centres. The policy has links to vacant and derelict land which provides opportunities to build new homes. However, due to the compact nature of town centres in East Renfrewshire contributions towards our housing requirements will be low.

There is no mention of Retail Impact Assessments or cross boundary impact and how this will be measured.

Policy 28: Historic assets and places**Q46: Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings?**

Yes. The policy is detailed and comprehensive and is consistent with existing guidance. NPF4 needs to encourage a proactive approach to the conservation of the historic environment, recognising the environmental benefits this brings.

Impact of climate change in maintaining historic buildings should be included.

Policy 29: Urban edges and the green belt**Q47: 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 introductory text should state the functions and purpose of the green belt, namely: to direct planned growth to the most appropriate locations and support regeneration; protect and enhance the quality, character, landscape setting and identity of urban areas; and to protect and give access to open space within and around urban areas. The strategic consideration of Green Belts and partnership working is missing. The use of Green Belt policies has been successful in supporting the implementation of the Clydeplan 'compact city' approach.

There is a tension between the housing requirements and the NPF4 desire to use Policy 29 to limit urban expansion. The environmental quality and sensitivity of the green belt in East Renfrewshire poses a significant constraint to the capacity of the area to accommodate significant levels of development and will impact on what future requirements are achievable. Meeting the housing requirements will likely come from large edge of settlement green belt release sites, which are generally away from local services and existing infrastructure, contrary to climate change, biodiversity, brownfield objectives and 20-minute neighbourhoods.

29a LDPs should 'identify green belt boundaries' not 'consider using green belts'.

29b – retired workers accommodation – what happens to the property if the retired worker moves away?

29b – '*development meeting a national requirement or established need, if no other suitable site is available*'. The wording here is very wide ranging – established need should be removed and replaced with site specific or operational need.

29b – '*one-for-one replacements of existing permanent houses currently in occupation*' – text should also clearly state that replacement should be of a similar scale, footprint, character, height and massing to the dwelling being replaced.

29b – policy should state that proposals should make use of existing or replacement buildings whenever possible

Where development does occur in an area on the urban edge the policy could be improved by including a clause with a requirement to provide some measure of greenbelt enhancement.

There is no mention of biodiversity or linkages with the 20-minute neighbourhood concept.

Policy 30: Vacant and derelict land**Q48: Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?**

We welcome and supports this updated and pro-active policy. The re-use of vacant and derelict sites is critical if the aims and aspirations of the Draft NP4 are to be achieved and will enable more Greenfield land to be protected. It may also act to protect land on the urban fringe through Policy 29.

Due to the importance of prioritising brownfield and vacant sites this policy deserves to have a higher recognition within the Draft NPF4 and elevated earlier in the document.

Policy would benefit from the inclusion of links to other relevant considerations in the plan for e.g., the link between the promotion of re-use of derelict buildings and the Infrastructure Hierarchy referenced in '*Policy 8 Infrastructure First*'.

The policy may act to incentivise development of brownfield land while policy 30 (d) safe guards against unviable applications. Where brownfield land is contaminated, there are often substantial financial and technical challenges to overcome which require a degree of flexibility and ingenuity to overcome these. There are a number of other NPF4's polices which combine to contribute to the productive re-use of brownfield land.

Policy could go further and require vacant and derelict land without live current planning consent to be temporarily greened? This would help with the aim to accelerate urban greening and assist with short–medium term biodiversity and green network aims.

30a - LDP will not seek to 'reuse' vacant and derelict land - it will allocate or identify such sites.

30b – not all vacant and derelict sites are in sustainable locations so the support in principle should be caveated.

30c – while we support the principle that green field sites should not be supported this concept is addressed elsewhere and is not required to be repeated for this policy.

30e - policy should also recognise suitability based upon local character etc. Justification for demolition should be supported by a structural survey that identifies that refurbishment of an existing building to tolerable standards is not achievable.

The policy needs to have a strong focus on delivery and financial mechanisms to be successful.

Policy 31: Rural places**Q49: Do you agree that this policy will ensure that rural places can be vibrant and sustainable?**

We support the aim that rural places should be vibrant and sustainable locations.

There is no mention of digital connectivity which is a significant omission.

31c- clarity on what '*a small site that would not normally be used for housing*' means. 20-minute neighbourhood concept may not translate to rural areas successfully as referenced in earlier comments.

The same issue remains with retirement homes as for 'Policy 29 Urban Edges and the Greenbelt'.

Policy 32: Natural places

Q50: Do you agree that this policy will protect and restore natural places?

We are generally supportive of the aims of this policy. However, the policy should link to the nature crisis key principle. LDPs should 'identify, protect *and enhance* locally, regionally.....'.

There is no mention of biodiversity net gain or targets which is a significant omission.

32a – new terms introduced such as '*nature rich areas*' and '*nature networks*' – would have been better to use green networks as this is terminology is used throughout the Draft NPF4.

32b – This is a key policy that supports nature crisis key principle but is hidden near the end of the document. It should have been given greater prominence.

32c – include reference to relevant tests and legislation. Text needs to be clearer.

32e – 1st sentence add the word significant before '*adverse effect*'. Provide link to 'relevant statutory tests'.

32g – '*ecological appraisal*' will be required. This appraisal should identify measures adequate to mitigate any impacts that are identified.

32f – provide link to legislation on non-native species. Text needs to be clearer.

Policy 33: Peat and carbon rich soils

Q51: Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

The expansion of the policy detail on soils is welcomed. Peatland and carbon rich soils can play a key role in the achievement of net zero by 2045 through carbon sequestration and storage. This topic has been relatively low key in planning decisions not associated with wind energy development. This is an area of specialised expertise and may require planning authority staff to acquire new skills and knowledge.

The policy does not mention the damaging impact tree planting can have on peat. Is the expectation that this is identified in Planning Authorities woodland strategies? Clarification is required.

Policy 34: Trees, woodland and forestry

Q52: Do you agree that this policy will expand woodland cover and protect existing woodland?

The expanded policy on trees and woodlands is welcomed. The shift from '*should be protected from adverse impact*' in SPP to the NPF4 policy: '*Development proposals should not be supported where they would result in... adverse impacts*' makes the policy stronger.

The expansion of the Policy to include Policy 34 e which recognises the wider benefits of woodlands is welcomed. In addition to the Woodland Strategies to be prepared by each

planning authority, there is an existing Clyde Plan woodland strategy. The RSS can continue to play an important role identifying opportunities and region wide networks across the Glasgow City region. The policy could also benefit reference the Scottish Government's woodland planting targets.

Policy 35: Coasts

Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

No specific comment

Part 4 – Delivering our Spatial Strategy

Q54: Do you agree with our proposed priorities for the delivery of the spatial strategy?

Q55: Do you have any other comments on the delivery of the spatial strategy?

Critical to the success of NPF4 will be its delivery and implementation. It is disappointing that the delivery programme outlined in part 4 has not been prepared alongside the Draft NPF4. Whilst we appreciate that a lot of detail will come with LDP guidance and regulations, at least headline information on how an infrastructure approach will be achieved should be contained in the NPF document itself.

It is crucial to the success of Scotland's planning system and NPF4 that Planning Authorities are properly resourced. Delivery of the strategy will require collaborative partnership working with a range of organisations and stakeholders who will assist with professional knowledge on needs, future provision etc, finance and provision of infrastructure. The alignment of resources, plans, strategies and funding over the short, medium and long term is critical. The Draft NPF4 introduces many areas requiring particular specialist skills and areas of expertise which will require additional resourcing and funding for reskilling and upskilling of Local Authority Planners, elected members and external consultancy assistance.

Annex A – NPF4 Outcomes statement

Q56: 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?

Yes. No further response required.

Annex B – Housing numbers

Q57: Do you agree with the Minimum All-Tenure Housing Land Requirement (MATHLR) numbers identified above?

Response set out under Policy 9.

Annex C – Glossary of definitions

Q58: Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

Affordable home/affordable housing – we support the definition and reference to ‘high quality’ affordable homes. It’s not acceptable for there to be a disparity, when referring to quality, between those homes referred to in Policy 9 and the requirements for affordable homes. Both should be required to be of a high quality. Also, we note the change from modest to low incomes in this new definition. Does this mean affordable housing is then only to be aimed at those on lower quartile incomes? We would suggest changing this back to modest incomes so that we have the flexibility to address a range of affordable housing needs, for those on varying levels of income (lower to median), across different tenures.

Enabling development – suggest there should be reference in the definition to this needing to be the minimum necessary to secure its restoration, adaptation and long-term future.

As aforementioned the glossary should include a definition for:

- Community Wealth Building
- Design Led Approach
- Green Economy
- Just Transition
- Land assembly
- Lifecycle greenhouse gas emissions
- Local centres
- Local Place Plan
- MATHLR
- Nature based solutions
- Neighbourhood shopping
- Planning obligation
- Place Based Approach
- Regional Spatial Strategy
- Urban and Rural Synergy
- Wellbeing Economy