



Glasgow City Council

**Neighbourhood, Housing and Public Realm
City Policy Committee**

**Report by Executive Director of Neighbourhoods, Regeneration
and Sustainability**

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Item 2

8th March 2022

DRAFT NATIONAL PLANNING FRAMEWORK 4 CONSULTATION

Purpose of Report:

To update Members on the Scottish Government's publication of the draft National Planning Framework 4 and the Council Response Position.

Recommendations:

The Committee is asked to consider:

- (a) The key content of the draft NPF4; and
- (b) The initial headlines which will be incorporated into the feedback to the Scottish Government on NPF4.

Ward No(s):

Citywide: ✓

Local member(s) advised: Yes No consulted: Yes No

1 Introduction

- 1.1 Members will recall a [report](#) brought to Committee in November 2020. This highlighted the introduction of a new Planning Act in 2019, which includes amendments to the content and procedures for preparing the National Planning Framework and local development plans.
- 1.2 Over the last few years, the Scottish Government has been preparing a new, fourth National Planning Framework. This framework was published in November 2021, followed shortly by the publication of new draft Local Development Plan (LDP) regulations and guidance, and draft Open Space Strategy and play sufficiency assessment guidance, in December. NatureScot also published draft guidance on securing positive effects for biodiversity from local development, to support policy 3 of the draft NPF4.
- 1.3 The fourth national planning framework will be the first to incorporate Scottish Planning Policy and once adopted, it will form part of the Development Plan, along with LDPs. The new expectation, as set out in the draft LDP regulations, is that LDPs will contain minimal thematic policy wording and instead be focused on places and locations. The thematic policies will be contained in the National Planning Framework, which will have the status of the Development Plan in decision making. This will place significant responsibility upon NPF4 in shaping the next City Development Plan and in the determining planning and development decisions in the City.
- 1.4 National engagement has informed the preparation of the draft framework, which the Council participated in, at different stages. Members will recall a [report](#) brought to Committee in January 2021. This outlined the headlines of the Council's response to the NPF4's 'Position Statement' stage, which proceeded from the 'Call for Ideas' stage in 2020. These responses emphasised the inclusion of key themes relevant to Glasgow, including approaches such as brownfield first, infrastructure first, town centre first, 20-minute neighbourhoods, zero emissions, climate adaptation and health and wellbeing improvements.
- 1.5 The intention of the Council is to provide feedback to each of the current national consultations, listed in paragraph 1.2. However, given the significant responsibility placed upon NPF4 in future city planning and development, this report focuses on the initial reactions to the draft framework. The Council has already submitted a response to NatureScot's consultation, which closes on the 4th of March 2022.
- 1.6 The consultation to NPF4, along with the other Scottish Government documents, closes on the 31st of March 2022. The initial thoughts on the framework provided in this report have been informed by a series of technical workshops and inviting comments from a range of officers across the Council family. Elected Member briefings were offered in February to collect further views on the framework. The output of these and further technical input, will enable the final response to be prepared for the deadline. Council officers have

also participated in workshops organised by Heads of Planning Scotland and Clyde Plan, to help shape the responses from these partnering bodies.

2 Draft NPF 4 Overview

2.1 The National Planning Framework 4 (NPF4) is a long-term plan which sets out an approach to planning and development that will help to achieve a net zero, sustainable Scotland by 2045.

2.2 The Draft NPF4 consists of 4 main parts, including:

2.3 **Part 1 - National Spatial Strategy for Scotland to 2045.** The Strategy is based around sustainable places, liveable places, productive places and distinctive places. It sets out 6 spatial principles and 5 Action Areas for Scotland, with the Glasgow City Region described within the 'Central urban transformation' area. This area includes Glasgow city region and the Ayrshires, Edinburgh city region in the east, including the Tay cities, the Forth Valley and Loch Lomond and The Trossachs National Park.

2.4 **Part 2** - sets out the 18 **National Developments** which will support the Spatial Strategy. In addition to all Scotland wide National Developments e.g. National Walking, Cycling and Wheeling, Digital Fibre Network, Strategic Renewable Electricity Generation and Transmission Infrastructure, Circular Economy Materials Management Facilities in a Glasgow City Region context, there are a number of identified National Developments including:

- Central Scotland Green Network;
- Urban Mass/Rapid Transit systems - 'Glasgow Metro';
- Urban Sustainable Green/Blue Networks - Metropolitan Glasgow Strategic Drainage Partnership (MGSDP)
- High Speed Rail; and,
- Clyde Mission.

2.5 **Part 3 - the National Planning Policy Handbook.** This consists of 35 policies which set out the policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning applications.

2.6 There are 6 universal policies under the Sustainable Places theme. These comprise Policy 1 which supports a plan-led approach to sustainable development, focusing on the development plan being key in the delivery of public interest led development. Policies 2 and 3 focus on the dual crises of climate change and the threat to biodiversity; policies 4 and 5 focus on people related issues of human rights and equalities along with community wealth building and policy 6 is focused on the need for high quality design of places.

2.7 There are 29 subject specific policies split across the following themes:

| Liveable Places | Productive Places | Distinctive Places |
|--|---|--|
| <u>20 Minute Neighbourhoods</u> Policy 7 - Local living | Policy 16 - Land and premises for business and employment | <u>City, Town, Commercial and Local Centres</u> Policy 24 - Centres Policy 25 - Retail Policy 26 - Town Centre First Assessment Policy 27 - Town Centre Living |
| Policy 8 - Infrastructure First | Policy 17 - Sustainable tourism | Policy 28 - Historic assets and places |
| Policy 9 - Quality Homes | Policy 18 - Culture and creativity | <u>Urban Edges and the Green Belt</u> Policy 29 - Urban edges |
| Policy 10 - Sustainable Transport | Policy 19 - Green energy | Policy 30 - Vacant and derelict land |
| Policy 11 - Heating and Cooling | Policy 20 - Zero waste | Policy 31 Rural places |
| Policy 12 - Blue and green infrastructure, play and sport | Policy 21 – Aquaculture | Policy 32 - Natural places |
| Policy 13 - Sustainable flood risk and water management | Policy 22 – Minerals | <u>Peat and Carbon Rich Soils</u> Policy 33 – Soils |
| Policy 14 - Lifelong health, wellbeing | Policy 23 - Digital infrastructure | Policy 34 - Trees, woodland and forestry |
| Policy 15 - Safety | | Policy 35 – Coasts |

- 2.8 **Part 4** - sets out the **delivery strategy** for NPF4. This will be developed into a standalone, live delivery programme once the framework has been adopted. It identifies a range of potential key mechanisms to support delivering the aims of the framework.

3 Response Headlines

3.1 Overall, the Council welcomes the publication of the draft NPF4 and values the opportunity to consider and feedback on its content. The level of engagement from across the Council in the review, illustrates Glasgow's commitment to providing a robust understanding of how the framework might be interpreted and applied locally. In doing so, areas for suggested improvements and enhancements will be identified. The final response back to the Scottish Government will be structured around a series of questions, set out in the draft framework. To provide Members with a narrative on initial reactions to the framework, focusing on matters more particular to Glasgow, these have been presented under the following headings.

National Spatial Strategy

- 3.2 The Council agrees with the strong alignment with several of the framework's spatial principles for Scotland 2045. Presently, a model of compact growth is supported by the City Development Plan, which is prioritising inner urban development through regeneration of vacant and derelict land. The concept of creating networks of 20-minute neighbourhoods and making productive use of existing buildings, places, infrastructure and services, is pertinent for Glasgow's relatively dense urban environment. The principle focused on 'urban and rural synergy', however, presents an opportunity to consider more widely the future relationship between urban and rural places, through the productive use of the landscape for local food production, carbon offsetting and energy generation (as examples).
- 3.3 The Central Urban Transformation area gives an early spotlight on the challenges facing the Glasgow City Region, identifying the relatively high concentrations of poor health, economic disadvantage and population decline, as key issues. The draft framework acknowledges the current imbalance between the east and the west of the area however it does not go on to outline how this is effectively addressed. The Council strongly encourages the development of a clear vision in NPF4, which seeks to rebalance growth within the area, while making use of vacant and derelict land.
- 3.4 The Council broadly supports the actions set out under the Central Urban Transformation area. Realising a number of these will require a regional and catchment scale approach. For example, actions to accelerate urban greening and rediscover urban coasts and waterfronts. The role of the Regional Spatial Strategies (RSS), to spatially coordinate activities and guide delivery at scale and across authority boundaries, will be key. This is currently underplayed in the draft. The Council suggest the RSS groupings are shown in NPF4 and a clearer outline of their status and importance, is provided.

- 3.5 The focus on the action to reinvent and futureproof city centres within the Spatial Strategy of the framework, is welcomed. Glasgow city centre has been hit exceptionally hard by the pandemic and the increase in localism. Greater recognition is needed of the commitment to double the residential population in the city centre, as identified by the City Centre Living Strategy and Strategic Development Framework for the City Centre. A significant part of increasing residential density to support the City Centre will come through the development of the inner-city ring of neighbourhoods including Calton, Laurieston, Tradeston, Sighthill, Dundashill and St Enochs. This is reflected in Glasgow's spatial strategy in the current City Development Plan and worth setting out in NPF4.

National Developments

- 3.6 Overall, the Council broadly supports the national developments identified for the Glasgow City Region. The recognition of the need to address flood risk (existing and future), and the role that nature-based solutions and urban-greening needs to play to deliver water resilient places, is welcomed. The ambition to build on the benefits of the MGSDP, to continue investment and extend the approach to the Edinburgh city region, serves as a strong endorsement to the Council and partners involved.
- 3.7 The emphasis on national developments which support modal shift to public transport and active travel aligns with the Council's efforts to increase connectivity and support the delivery of 20-minute neighbourhoods. The opportunity for transformational change that 'Clyde Metro' presents as part of National Development 3, is also welcomed. While still in an early conceptual stage, it is anticipated this will help to offer a low carbon transport, for a significant part of the urbanised conurbation. In addition, the Council recognises the importance a national network of walking, cycling and wheeling plays in connectivity but highlights that local needs should also be well served by this network.
- 3.8 At the 'Call for Ideas' stage, the Council recommended that NPF4 should identify the River Clyde as a National Development to support Clyde Mission and address climate challenges, vacant and derelict land, and co-ordinate sustainable regeneration opportunities. Therefore, it is encouraging to see its inclusion in the draft. There are significant opportunities within Clyde Mission from Glasgow Riverside Innovation District (GRID), for sustainable high value growth, around Glasgow University campus to Govan. These have been identified within the Council's Strategic Development Frameworks for Govan – Patrick and the River Clyde and merit incorporation within the development description in the framework. As identified in the framework, the lifecycle greenhouse gas emissions assessment for Clyde Mission concludes an overall net negative impact on achieving national greenhouse gas emissions reduction targets, is likely. The Council would welcome the opportunity to work together with the Scottish Government to better understand this forecast and see how Clyde Mission could be developed to support the journey to net zero, rather than competing against this.

- 3.9 Strong co-ordination and place leadership will be vital to support the successful development and delivery of the national developments within the Glasgow City Region. The Council has a key guiding role to play, helping to shape how the national developments fit together spatially, timeously, and organisationally. The current City Development Plan has already taken proactive steps to develop a more Corporate Delivery Programme to better align activities within the City, developing from the City Development Plan Action Programme. Similarly, the next City Development Plan can form a central tool in aligning the national developments, alongside reflecting local place and location priorities.

National Planning Policy Handbook

Overall, the universal policy themes set out in the National Planning Policy Handbook, aligns with many of Glasgow's current priorities including tackling the climate and ecological crisis, delivering high quality placemaking, supporting inclusive growth and addressing equality issues. The suite of specific policies, grouped under liveable, productive and distinctive places, is welcomed and highlights the wide range of themes planning considers in both development planning and management. Key areas where the policy wording generally needs further development to provide greater clarity and weight in local decision making, will be included in the final response. The initial reactions to some policies, which create greater tensions when applied locally, are discussed below.

- 3.10 As highlighted in the Council's response to the NPF4 Position Statement, Glasgow's timelines to be carbon neutral by 2030 are more pressing than the national ones. Alignment remains a challenge for Glasgow, with the draft NPF4 aiming for 'net zero' by 2045. The inclusion of clear targets and an assessment criteria in Policy 2 on 'Climate Emergency', would help drive change in both public and private sector-led developments and enable the Council to be at the forefront of the transition to net zero. The Council would similarly welcome the inclusion of clear metrics to support the intent of Policy 3, addressing the nature crisis, which Glasgow was the first city in Scotland to declare an ecological emergency.
- 3.11 Policy 9 on Quality Homes appears to place the Development Plan at the heart of housing delivery, which is welcomed. There is however a risk that the framework, may deter investment as it portrays a gloomier impression of the outlook for the Glasgow City Region. For example, the household projections, and the consequent Minimum All-Tenure Housing Land Requirement (MATHLR) figures in the draft NPF 4 anticipate a continuation of recent trends of higher levels of housebuilding in the East, and lower in the West. The National Records of Scotland projections from 2018-43, however, show population growth in 5 out of 8 Glasgow City Region local authority areas (and stability in 1 local authority area). In terms of households, the projections show growth in 6 out of 8 local authority areas (and again stability in 1 local authority area). The Council would welcome further consideration of the policy to better convey the complexity of the dynamics of the Glasgow City region and an approach (as highlighted in paragraph 3.3), which looks to re-balance housing growth across the Action Area. This would also support the commitment to

prioritise the reuse of brownfield/vacant and derelict land which is more prevalent in the West.

- 3.12 Policy 24 on 'Centres' provides an opportunity to distinguish City Centres from other Town Centres. Glasgow recognises that the city centre presents a different set of challenges and warrants different policy approaches. By virtue of the scale and strategic role in driving the Glasgow City Region economy, Glasgow's city centre goes beyond the role of a town centre, which is primarily focused on local community needs. A separate policy for City Centres would allow a stronger policy intent to be translated to a local level through the next City Development Plan and development management decision making.
- 3.13 Vacant and derelict land remains a key issue for the Glasgow. The Council supports the brownfield first approach, integrated throughout the draft framework. The reuse of existing buildings will become an even more pressing priority for the City, with greater consideration given to zero waste, embodied carbon and efforts to mainstream retrofitting. The inclusion of Policy 30, on vacant and derelict land and buildings, is welcomed. The Council recognises that vacant land and buildings are often vacant for a reason (typically financial, legal and/or technical reasons). Redundant buildings and land in the heart of communities can create significant blight, impact people's health and wellbeing and the prosperity of the place. Recognising this and giving greater priority to the prominence of sites in the policy wording, would be welcomed.
- 3.14 The intent of Policy 32 on Natural Places is to protect and restore natural places. Its wording, however (in part g) appears to relax the protection given to Local Nature Conservation Sites and Local Landscape Areas, in favour of development which can demonstrate 'local importance'. Since Glasgow only has a limited number of international and national designations, local nature conservation designations form the backbone of Glasgow's nature networks. The Council would strongly welcome a revision to the wording within this policy, to ensure Glasgow's nature networks are protected for current and future generations.

Delivery Strategy

- 3.15 The Government has identified that work is ongoing to develop a detailed delivery programme to accompany the final NPF4. This will involve key partners including Scottish Government portfolios, the Infrastructure Delivery Group, the Scottish Futures Trust, local authorities and the key agencies. The Council welcomes the opportunity to support this activity and have already expressed interest to the Scottish Futures Trust, who are helping facilitate engagement.
- 3.16 The Council is strongly placed to draw on experience of delivering place-based, multi-agency led planning and development activities. For example, the delivery of the Transformational Regeneration Areas (TRAs) across the city provides practical examples of aligning resources, land assembly and infrastructure first approach. The delivery of strategic green and blue infrastructure, as part of the MGSDP, provides examples of an infrastructure first approach which is designed for future climate change. The development of ClydePlan

demonstrates the successful collaboration of the City Region's local authorities and partners to develop a spatial strategy for the metropolitan area.

- 3.17 Nevertheless, to realise the full breadth of new policy ambitions and commitments, this will require substantial coordination, local interpretation, and new skills development. The framework identifies several technical aspects which will be required to support local decision-making and plan preparation. Staff will need time and resources to ensure they are appropriately skilled up to make informed decisions and the effective use of spatial data will remain a key part of local development planning. In addition, there are 49 new duties which were placed on Planning Authorities through the Planning (Scotland) Act 2019, as highlighted in a [research paper](#) by the Royal Town Planning Institute (RTPI) and this resource pull should also be acknowledged.

4 Next Steps

- 4.1 The Council will submit a formal response to the Government's draft framework by 31st March 2022, that follows on from the position set out above.

5 Policy and Resource Implications

Resource Implications:

| | |
|-------------------------|---|
| <i>Financial:</i> | There are no significant financial resource implications associated with responding to the draft NPF 4. As outlined in this report, new skills and approaches will be needed to implement the policies within framework and this is likely to have future financial implications. |
| <i>Legal:</i> | There are no legal implications associated with responding to the draft NPF 4. Once adopted NPF4 will set new parameters for legal agreements that will need to be adopted in the new City Development Plan and this may have legal implications. |
| <i>Personnel:</i> | Staff from NRS Planning Services will manage the preparation of the response to the consultation and coordinate input from other NRS divisions and Services, as required. |
| <i>Procurement:</i> | There are no procurement implications associated with responding to the draft NPF 4. |
| Council Strategic Plan: | Specify which theme(s) and outcome(s) the proposal supports |

A Thriving Economy

1. Deliver the Glasgow Economic Strategy 2016-2023 and ensure it is supported by expert external advice from the Glasgow Partnership for Economic Growth.

2. Deliver the Glasgow City Region City Deal, supported by the Regional Economic Strategy 2017-2035 and its Action Plan.

6. Support small businesses and encourage business diversity in local high streets across the city, and continue to support Business Improvement Districts.

A Vibrant City

13. Maintain Glasgow's reputation as a world class city for heritage and events building on the legacy of 2014 and support Glasgow to become more active and meet the outcomes set for an Active Scotland.

15. Deliver the Glasgow Tourism and Visitor strategy.

21. Support communities to develop play opportunities and street play spaces.

Excellent and Inclusive Education

31. Extend the use of walking, buses to schools and safe cycle routes to encourage cycling.

A Healthier City

49. Build on our Age Friendly City strategy and action plan.

A Sustainable and Low Carbon City

54. Invest in roads and pavement maintenance, improving conditions, residents' satisfaction and contributing to active travel networks. Ensure community involvement in local decision making about this investment.

55. Prioritise sustainable transport across the city.

63. Give all children better access to outdoor play by upgrading school playgrounds and play areas.

65. Build high quality, inclusive active travel infrastructure, investing a minimum of 10% of our transport infrastructure budgets in cycling and walking to make Glasgow an excellent cycling and walking city.

67. Become a carbon neutral city by 2037, reviewing our energy carbon masterplan in 2019, and investigating membership of international networks, the Carbon Neutral Alliance and C40.

71. To promote and enhance our city's natural resources including nature reserves and public parks.

Resilient and Empowered Neighbourhoods

74. Develop a more integrated approach to how we use our policies, assets and while the Plan has not yet been produced, its scope and coverage will span many areas of the Council's Strategic Plan and will play a pivotal role in the long term delivery of strategic outcomes.

Equality and Socio-Economic Impacts:

Does the proposal support the Council's Equality Outcomes 2021-25? Please specify.

There are no significant equality or socio-economic impacts arising from this report which is principally reporting on the draft NPF4. However, an [Integrated Impact Assessment/Society and Equalities Impact Assessment](#) has been carried out by the Scottish Government on the draft framework.

What are the potential equality impacts as a result of this report?

There are no significant equality impacts arising from this report which is principally reporting on draft NPF 4.

Please highlight if the policy/proposal will help address socio-

There are no significant socio-economic impacts arising from this report which is principally reporting on draft NPF 4.

economic disadvantage.

Climate Impacts:

Does the proposal support any Climate Plan actions? Please specify:

The draft NPF 4 will contribute to delivering directly on the Climate Plan action 36: Accelerate Implementation of the Glasgow and Clyde Valley Blueprint for a Green Network.

What are the potential climate impacts as a result of this proposal?

The approach of the draft NPF4 is intended to achieve an overall positive impact on climate change. As highlighted in this report however, greater detail in the framework is needed to ensure appropriate weighing can be given to climate change in decision on development proposals.

Will the proposal contribute to Glasgow's net zero carbon target?

The draft NPF 4 will broadly support Glasgow's net zero carbon ambition. However as highlighted in this report, the framework policies need greater detail to support meeting specific targets.

Privacy and Data Protection Impacts:

There are no potential data protection impacts as a result of this report.

6 Recommendations

6.1 The Committee is asked to consider:

- (a) The key content of the draft NPF4; and
- (b) The initial headlines which will be incorporated in to the feedback to the Scottish Government on NPF4.