



# CONSULTATION QUESTIONS

## Glasgow City Council Response – March 2022

Glasgow City 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. Internal workshops with subject-matter specialists and Elected Members have been held to gather broad insight into the final response (outlined below). We hope the comments are of assistance to SG Planning and Architecture Division however we would be happy to provide further insight or support in refining any sections of the framework.

### Part 1 - A National Spatial Strategy for Scotland 2045

#### Sustainable places

Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment.

#### **Q 1: 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?**

Glasgow City Council (the Council hereafter) welcomes the recognition in NPF4 that place and consequently the land use planning system, has a key role to play in mitigating the impacts of climate change, reducing carbon emissions across the built environment and restoring the losses incurred over previous decades to our natural environment.

The Council specifically welcomes the ambition to encourage low and zero carbon design, energy efficiency and reducing the need to travel in unsustainable ways. In the main, the City Development Plan (adopted March 2017) supports these principles and seeks to apply them across the city through the planning system. In addition, the Council is engaged in a multitude of low and zero energy projects across the city that support the overall aims of the City Development Plan. Recognising that, the Council wishes to ensure that the planning profession is equipped and recognised to properly

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ensure a step-change in development is established to secure the net-zero target within the afforded time scales. There is a general concern that resourcing and other constraints will pose threats to the scalability and delivery of net-zero projects. On that point, the Council would welcome consideration that this section tie-in more clearly to the national spatial strategy and the national developments later explained in the draft.

The Council welcomes further consideration in NPF4 to make a clear statement in “Sustainable Places” that the strategy encompasses not only the creation of new places but focuses on retrofitting the existing built environment as well. This is very relevant to Glasgow where over 77,000 homes were built before 1919, constituting around a quarter of the city's housing stock. The Government will be also be aware that some 70% of Scotland's built environment is expected to remain by 2045.

The Scottish Government will also be aware that the Council has set its own ambition to be net zero by 2030, 15 years prior to the net zero target in NPF4. Which target Scotland's local planning authorities adhere to will ultimately determine the scale and scope of change necessary to realise the ambition. As such, the Council welcomes clarification around which target ultimately should take precedence in land use policy and decision making.

Finally, the Council would welcome consideration of including the UN Sustainable Development Goals and/or the National Performance Framework in this section to provide further clarity of alignment between the Scottish Government's social and spatial policies.

### **Liveable places**

*Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live.*

### **Q 2: 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?**

In the main, the Council supports the aspirations put forward in this section of Draft NPF4. More detail would be welcomed regarding the distinction between new buildings and retrofitting the current built environment. As reusing/repurposing existing assets will expectantly become the predominate approach to development within the city over the next two decades, the Council would welcome a greater emphasis on a strategic approach to retrofitting in NPF4.

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**Q 3: 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?**

The Council agrees that investment in the green economy has the potential to support both social and environmental wellbeing. Historically, economic opportunity and investment has not been spread equally across Scotland or the UK. There is a great opportunity for NPF4 to not only support the transition to a net zero economy but to also address economic inequality spatially and in turn complementing the delivery of a wellbeing economy at a national level. In doing so, NPF4 would ensure that economic opportunities are available to all members of Scotland’s economy. The Council welcomes further consideration for how this can be expressed and reinforced in the spatial strategy and throughout the document.

The Council also welcomes consideration for the spatial strategy to make clearer links with the policy handbook section. For example, the spatial strategy could indicate how, through the use of the town centre first principle and the reuse of vacant and derelict land, land use can play a critical role in addressing the aspirations of the green economy.

**Distinctive places**

*Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.*

**Q 4: 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?**

The Council supports NPF4’s commitment of placing a stronger emphasis on place-making to ensure that development is distinctive and of a quality that the people of Scotland deserve. The Council welcomes further consideration for how the vision to 2045 can be clarified in this section. This could be achieved relatively simply such as by referencing to other parts of the document (policy, delivery, action areas etc.) so that there is a spatial or policy link to make the objectives in this section clearer to the reader.

This section recognises that there will be different solutions to different problems across Scotland. This is welcomed and the Council is of the mind that recognising the role that local context plays in decision making is critical. NPF4 has an important role to play in ensuring that local/place-based tiers of governance (e.g. local planning authorities and local communities) are empowered to shape the development of distinct places that reflect the unique geographies across Scotland. There is a potential risk that by promoting NPF4 to the status of development plan and containing decision

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making policies, the finer grain and specific local conditions could be lost or adversely diluted through standardisation across the Scotland. The Council would welcome further guidance on how this can be mitigated to ensure that Scotland's future places are distinct and reflective of their local context.

### **Q 5: DO YOU AGREE THAT THE SPATIAL STRATEGY WILL DELIVER FUTURE PLACES THAT OVERALL ARE SUSTAINABLE, LIVEABLE, PRODUCTIVE AND DISTINCTIVE?**

The Council is supportive of the principles in the Spatial Strategy and agrees with the scale and ambition put forward in the document. Naturally, there will be challenges to delivering the spatial strategy and the Council would welcome more detail to match the ambitious changes being presented here. There are also opportunities to make clearer spatial links in the strategy that would provide a clearer indication to the reader on key questions relating to how and where the country will change to 2045. Indicative mapping on where, for example, growth is expected or desired among other anticipated spatial outcomes beyond general improvement in health and wellbeing would make this section stronger. The Spatial Strategy should be written strongly enough to challenge the market to deliver change in approach and on the ground. It is somewhat unclear from the wording of the spatial strategy that this can be achieved.

### **Spatial principles**

### **Q 6: DO YOU AGREE THAT THESE SPATIAL PRINCIPLES WILL ENABLE THE RIGHT CHOICES TO BE MADE ABOUT WHERE DEVELOPMENT SHOULD BE LOCATED?**

The Council welcomes the inclusion of the spatial principles and believes them to be complimentary and supportive of the overall aims of the current City Development Plan. Consideration should be given to the principle focused Urban and Rural Synergy. This principle might work better as a green infrastructure principle that clarifies rural and urban settings to avoid misinterpretation of its purpose. There is 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). For example, the Glasgow Clyde Valley Green Network Partnership (GCVNP) Blueprint is a spatial example of a regional partnership working on multiple themes, which links urban and rural contexts. There is also concern that the compact growth principle and the balanced development principle could be seen to conflict with each other as regards the claim that people should have a choice where they live. Clarity over what choice this entails is crucial to avoid attempts to justify development in areas that are unsustainable.

In general, stronger links could be made to the spatial principles and the rest of the document, including the national developments and the policy handbook. This would provide the reader with a clearer understanding of how the different sections interact with each other and how the spatial principles are intended to be understood across

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Scotland's geographies. In addition, a clearer notion of 'who' particular content is aimed at. For example, is it for the Local Development Plan to capture, Development Management to apply or the Development Industry to take account of?

Spatial Strategy Action Areas

### **Q 7: DO YOU AGREE THAT THESE SPATIAL STRATEGY ACTION AREAS PROVIDE A STRONG BASIS TO TAKE FORWARD REGIONAL PRIORITY ACTIONS?**

The arrangement of the Spatial Strategy Action Areas takes in large and diverse geographies. For the Central Urban Transformation area, which the Glasgow City Region is part of, it would be helpful to better understand how the different places are working together. For example, are the links between the cities in the action area strengthened through the national developments or other actions?; what key networks link the area together and form a strong framework such as transport, green and energy networks and water catchments? A series of diagrams would help communicate this effectively. The themes embedded in the central urban transformation area are appropriate and target the right courses of action toward, especially concerning urban transport and heating. At the wider regional scale, there is some vagueness in the mapping and areas identified. At present it is not clear from the mapping how the boundaries of the Regional Spatial Strategies will fit into the action areas and what role the RSS will play, spatially, in driving forward the actions identified. This is of relevance to Glasgow's share of National Developments, all of which are being proposed at a scale that extends well beyond the city's administrative boundaries. The Glasgow City Region is more tangible as an area of regional regeneration focus, therefore a clearer spatial link between the action areas, the Regional Spatial Strategy groupings and the regional scale national developments would be welcomed.

### **Q 14: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?**

The Council strongly encourages the development of a clearer vision for Glasgow, the City Region and Scotland in NPF4. Specifically, in the central urban transformation area, the text spotlights the challenges facing the Glasgow City Region, identifying the relatively high concentrations of poor health, economic disadvantage and population decline, as key issues. The Council recognises these issues as challenges for the city and regional economy but a more balanced presentation of the Glasgow City Region's potential as a place for future growth, innovation and investment would be welcomed. 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 can be effectively addressed. This should be rectified to present a stronger and more equitable basis for future development across the country.

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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. With this regard, 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. This will involve a focus on creating a mixed-use centre that attracts a residential population of mixed ages and cultures, through providing a choice of attainable and affordable homes, that offer greater variety in housing size, type, tenure and cost. The Council acknowledges that the main opportunities for creating new homes in the centre lie in the redevelopment of vacant land and buildings, conversions of former/redundant commercial buildings and conversion of upper floors as part of vertically mixed-use buildings. In addition, a substantial part of increasing residential density to support the City Centre will also 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 to NPF4.

For the sake of clarity, the Council would suggest references to Glasgow Metro are changed to Clyde Metro to align the project with that which was referenced in STPR2.

### **Q 15: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?**

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.

#### **Action 13: Pioneer Low-carbon resilient urban living**

The Council suggests linking urban living to lower carbon emissions in the text.

#### **Action 14: Reinvent and future proof city centres**

The Council suggests linking the text to doubling Glasgow City Centre population and transitioning the city centre into a viable and liveable neighbourhood.

#### **Action 15: Accelerate urban greening**

The Council welcomes consideration for including this principle in Policy 34 to provide direct policy support for this aim that recognises the uniqueness of greening urban areas.

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**Action 16: Rediscover urban coasts and waterfronts**

The Council suggests linking Clyde Mission to Govan Riverside Innovation District (GRID), River Park and other city deal funded projects like the quay walls. The Council identifies the unintended consequence of Policy 13 in part 3 which would effectively prohibit redevelopment of vacant and derelict land in the very heart of Glasgow's urban core along the Clyde river corridor. This would undermine Policy 30 of NPF 4 which identifies the potential of vacant and derelict land to limit the need for urban expansion. This tension could be resolved if Policy 13 recognised the need for a more nuanced approach to flood risk and land use vulnerability for vacant and derelict land in built-up areas. The Council has been working with SEPA to agree an appropriate approach to manage coastal flooding within the river corridor in Glasgow while supporting the area's regeneration in line with a compact city model.

**17. Reuse land and buildings**

The Council supports this action and identifies the reuse of existing buildings (where feasible) and land as critical to contribute to a sustainable, net zero Scotland over the next two decades. The Council however identifies the core tension that policy 13 presents to reuse of brownfield land, with the introduction of Future Functional Floodplain resulting in over 50% of most development sites along the river Clyde within Glasgow, being constrained for regeneration.

**Action 19: Grow a wellbeing economy**

The Council welcomes the emphasis on economic disadvantage and targeting employment with better jobs. The need for the wellbeing economy to reduce the gap between the richest and poorest communities is critical and all actions should demonstrate how they are effectively achieving this.

**Action 20: Reimagine development on the urban fringe**

Whilst the Council supports this principle, Glasgow's local context of housing estates on the urban fringes are not represented in the text. These have specific challenges, including lack of fixed and reliable transportation to the urban centre, concentrations of vacant and derelict land, inter-generational community blight, limited learning and employment, poor quality local shopping and community facilities, alongside low market interest for private sector housing.

**Action 21: Improve urban accessibility**

As noted above, the Council recognises that transport accessibility is a major issue in the city. The text does not emphasise the decline in bus ridership and how this might be rectified through future interventions. Finally, the Council recognises that more could be done to improve the National Cycle Network (NCN) to transition more toward a utility-based system and not just leisure. At the moment, the network is perceived as not being usable all year due to lack of lighting and passive surveillance.

National Spatial Strategy

**Q 18: WHAT ARE YOUR OVERALL VIEWS ON THIS PROPOSED NATIONAL SPATIAL STRATEGY?**

The Council agrees with the general statements and principles of the national spatial strategy. It is considered that the labels, 'innovate', 'revitalise' 'transition' 'transform' and 'sustain' could and should apply to all areas of the country to reflect local and regional circumstances. Narrowing a geographic area to just one of the themes risks overlooking the opportunities and challenges that exist at reduced spatial scales. Apart from Net Zero 2045, it is not entirely clear what NPF4 is seeking to achieve and importantly how other goals other than net zero carbon are to be measured. As a general point, a clearer link could be made to the relationships and structure of the National Spatial Principles, the National Spatial Strategy, National Developments and the policy section.

**Part 2 - National developments**

**Q 19: DO YOU THINK THAT ANY OF THE CLASSES OF DEVELOPMENT DESCRIBED IN THE STATEMENTS OF NEED SHOULD BE CHANGED OR ADDITIONAL CLASSES ADDED IN ORDER TO DELIVER THE NATIONAL DEVELOPMENT DESCRIBED?**

The Council broadly supports the National Developments. A general point of clarification is sought regarding how priority is to be determined when more than one national development applies to a scale and location. Whilst it is understood that the basis for development is further secured through this overlap, it is not clear how LPAs are supposed to prioritise development proposals over a regional geography with national developments that could likely compete for the same land. Similarly, it is not clear which should be given more weight where a policy clashes with a national Development (e.g. the points raised regarding Clyde Mission with Policy 13). Further instruction and description are welcomed on this point so as to moderate potential tensions.

The Council also welcomes considerations in the text relating to practical outcomes for the national developments. For example, will a performance framework be created for each development to monitor their success over time?

The Council would like to make the following technical points per development:

**Central Scotland Green Network**

The Council wishes to note that not all greenspaces benefit from multi-functional uses and that this could compromise existing biodiversity value on site.

The clear requirements for provision and protection of public access to land and routes included in Scottish Planning Policy are absent from NPF4. SPP (at paragraph 221) requires that 'The planning system should.... provide for easy and safe access to and



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within green infrastructure, including core paths and other important routes, within the context of statutory access rights under the Land Reform (Scotland) Act 2003' and (at paragraph 228) that ' Local development plans should safeguard access rights and core paths, and encourage new and enhanced opportunities for access linked to wider networks.' Whilst we welcome the strong references to green and blue infrastructure, greenspace, green networks and active travel included in the draft NPF4, this does not include core paths, rights of way and other important local routes that planning has a really important role in protecting and enhancing. NPF4 should make clear reference to the need for planning decisions and developments to protect existing local paths (including key informal routes) and to facilitate non-motorised connectivity for the purposes of health, social inclusion and modal shift. Without such a reference, there is a risk that developments will not be required to accommodate existing paths nor provide connections to the wider paths network.

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

The Council would like consideration to be made to include references to the recently announced Glasgow City Active Travel Network. The Council would also like cycling to be promoted for the movement of goods for the 'last mile'.

### **Urban Sustainable, Blue and Green Drainage Solutions**

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.

### **Urban Mass/Rapid Transit Networks**

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 to the City Region as part of National Development 3 (ND 3) is strongly welcomed and as such it is suggested that ND 3 and Clyde Metro emerge as the same entity. 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 description of 'need' would benefit from being amended to include references to, place making, place quality, health/well-being and sustainable investment for inclusive economic growth.

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## **High Speed Rail**

The Council supports the principle of High Speed Rail to achieve faster cross-border rail journey times and reduce carbon emissions. It is recognised that cooperation with the UK Government will be necessary to achieve the necessary 'sub 3 hours' journey time that will facilitate significant modal shift and that the overall HS2 delivery programme has been extended and amended. We welcome the Scottish Government to implement what improvements it can within Scotland and continue to work with the UK Government to deliver further improvements in the north of England. It is recognised that complementary interventions such as Clyde Metro will free up capacity in Glasgow Central to help achieve the effective delivery of HS2.

## **Clyde Mission**

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. The concept of Future Functional Floodplain (as outlined in policy 13) would result in a significant increase in the area of land constrained by flood risk along the river within Glasgow. The introduction of Future Functional Floodplain would result in the constraint affecting well over 50% of most development sites. This in combination with Land Use Vulnerability which inhibits redevelopment of vacant land would render sites virtually undevelopable. Where development was permitted the requirement to have occupied floor uses above Future Functional Floodplain plus Freeboard would require development on a plinth and lead to a sterile ground floor that adds nothing to place quality. To ensure Clyde Mission delivers on its key objectives, NPF 4 needs to allow for a proportionate response to flood risk that recognises the hazards posed by different types of flooding and recognises that different approaches may be acceptable depending on the nature of the risk (e.g. Coastal flooding by its nature is predictable and lasts for a short duration around high tide.)

There are also 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.

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### **Q 20: IS THE LEVEL OF INFORMATION IN THE STATEMENTS OF NEED ENOUGH FOR COMMUNITIES, APPLICANTS AND PLANNING AUTHORITIES TO CLEARLY DECIDE WHEN A PROPOSAL SHOULD BE HANDLED AS A NATIONAL DEVELOPMENT?**

The Council considers that the level of detail in the statement of needs for the relevant national developments is sufficient.

### **Q 21: DO YOU THINK THERE ARE OTHER DEVELOPMENTS, NOT ALREADY CONSIDERED IN SUPPORTING DOCUMENTS, THAT SHOULD BE CONSIDERED FOR NATIONAL DEVELOPMENT STATUS?**

The Council considers that the need to reduce residential carbon emissions by 68% of 2020 levels by 2030 presents a necessity to consider how the large-scale adoption of renewable and low carbon fuels can be supported at a national level. Given the imperative for change it appears like a curious omission not to consider this as a national development priority.

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 recognises its key guiding role, helping to shape how the national developments fit together spatially, timeously, and organisationally. Greater recognition of this should be included within NPF 4. 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.

## **Part 3 - National Planning Policy**

### **Sustainable Places**

We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits.

### **Q 22: DO YOU AGREE THAT ADDRESSING CLIMATE CHANGE AND NATURE RECOVERY SHOULD BE THE PRIMARY GUIDING PRINCIPLES FOR ALL OUR PLANS AND PLANNING DECISIONS?**

Glasgow City Council has declared a Climate and Ecological Emergency in our Climate Plan (2021). We agree that addressing climate change and nature recovery should be front and centre; and the primary guiding principles for the betterment of our natural and built environment. All our plans should seek to bring back the balance through (i) improved management of resources, (ii) climate adaptation and mitigation, (iii) Nature Based Solutions (NBS) and biodiversity enhancement strategies, and (iv)

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measures to assess human driven environmental impacts. The guiding principles need to be supported by a framework with a qualitative approach to environmental management of existing and new development. If climate and biodiversity is to be front and centre; and we are showing commitment to the Glasgow Climate Pact; environmental assessment in planning is needed with clear metrics to support our move to implementation. There are several environmental indicators that will require to be applied to ensure we are delivering on our climate obligations and to ensure there is consistency of approach and an effective use of local authorities' resources. This will enable Local Authorities to measure the impact of existing and proposed infrastructure and development, so that we can understand where we are now, the impacts of change and related costs, how we can improve, and if we are meeting our environmental targets. Guidance is also required regarding preserving biodiversity on site and clear felling sites as part of these measures.

The Council believes that it will be of utmost importance to demonstrate that leadership on climate change and nature recovery develops co-benefits for communities that also improve social and economic well-being. A delicate balance will need to be achieved to simultaneously prioritise climate change action with other local, regional, and national policy goals, such as those relating to the National Performance Framework or the UN Sustainable Development Goals. This could be made more obvious in the text.

Addressing climate change should balance both mitigation and adaptation more equally to close the adaptation gap and increase resilience to climate change that will happen irrespective of whether Scotland achieves net-zero. Nature recovery should be a primary guiding principle for all decisions, with a strong focus on blue-green infrastructure / nature-based solutions. Application of the 'place principle' should consider how that 'place' can contribute to increasing the resilience of adjoining places / communities. This is of particular importance for a catchment-led approach to flood risk management, and to help deliver flood risk net gain. Without a principle of additionality through net gain being delivered by 'new' places, there is much reduced likelihood of delivering resilience for existing places.

Policy 1: Plan-led approach to sustainable development

### **Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?**

The Council is a strong supporter of a plan-led approach to sustainable development and the notion that planning and specifically local development plans, should manage the use and development of land in the long-term public interest. The Council would encourage the Scottish Government to consider providing a definition of the 'long-term public interest' to focus minds and limit the scope for special interest interpretations of what the long-term public interest is (or isn't). It is welcome that Policy 1 denotes the national outcomes for Scotland and the UN Sustainable Development Goals. If these are the underpinning documents that should guide local development plans, they (the

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national outcomes and the UN goals) should be guided by proxy decisions. This could be made clearer in the text or with the addition of a diagram.

As regards, the grouping of universal policies, clarity over which, if any, have priority over others would be welcome. It is not entirely clear in the present arrangement whether a proposal that meets some but not all policies should be supported.

Policy 2: Climate emergency

### **Q 24: DO YOU AGREE THAT THIS POLICY WILL ENSURE THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE CLIMATE EMERGENCY?**

The Council welcomes the status given to the Climate Emergency in Policy 2. It will be an important step in ensuring the planning system takes account. However, without clear metrics, this policy is likely to be open to interpretation. This could lead to a business-as-usual approach; with developers not upholding the urgency and enabling the level of change necessary to address the climate emergency. Without a mandatory regulatory process, it may be that planning will be unable to fully enforce or implement the desired outcomes in a way that reflects the connotation of an *emergency*. The Climate Emergency necessitates a more concise and measured language; with robust criteria that is consistent, equitable, and just. Similarly, a whole place approach to the climate emergency is needed to be reflected in the policy, ensuring that climate action is delivered on a place scale also.

As alluded to in the discussion around Policy 1, the Council has concerns that the use of language in this policy requires robust and concise definitions. Specifically, definitions around 'significant emissions', 'minimise emissions', 'emissions offsetting' will be necessary to avoid time-consuming discussions of interpretation.

The Council would be happy to work with the Scottish Government and others to develop a clear and national metrics to support this policy intent.

Policy 3: Nature crisis

### **Q 25: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE NATURE CRISIS?**

The Council is supportive in principle of Policy 3: Nature Crisis. The Council notes that this policy specifically requires that LDPs facilitate the creation of nature networks. There is confusion around what is meant by 'facilitate' and whether this includes scope to identify and protect the spaces within a LPA's boundary. The Council welcomes further elaboration on this point and how Policy 3: Nature Crisis interacts with Policy 32: Natural Places. There is concern that without the ability to identify and protect spaces that the policy would be undermined and not achieve its stated aims. As such,

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the Council is of the opinion that LDPs should be enabled to protect and identify new nature networks within its boundary.

There is also a general concern that the policy wording lacks a metric based methodology, such as the guidance that has been produced by Nature Scot. There is concern that without a set of metrics to guide proposals local interpretations or measures might be instituted determining what level of enhancement is appropriate. This would potentially undermine certainty in the planning system which was not the stated aim of Planning reform. The Council encourages the Scottish Government to consider how Policy 3 can be further elaborated upon to ensure that new development helps reverse biodiversity loss. The Council also considers that making a clearer link with Policies 32-35 would aid the reader in better understanding how the policies work together. The Council would welcome greater recognition of that biodiversity teams and expertise are limited within Local Authorities and given the policy shift to environmental issues being equal to the economy, this might give rise to increase in consultations, delays and impact on development management performance.

The Council would be happy to work with the Scottish Government and others to develop a clear and national metrics to support this policy intent.

### Policy 4: Human rights and equality

**Q 26: 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 Council is supportive of Policy 4: Human rights and equality. The Council recognises that people's right to make representations in the planning system is a cornerstone of our democracy. The Council welcomes further consideration on how measures taken forward from planning reform can enable earlier consultation and collaboration with as wide a representation of society as possible.

Elected Members across the parties raised that they would wish to see '3<sup>rd</sup> party rights of appeal' reconsidered as a means of creating a more equality in planning decision/outcomes.

### Policy 5: Community wealth building

**Q 27: DO YOU AGREE THAT PLANNING POLICY SHOULD SUPPORT COMMUNITY WEALTH BUILDING, AND DOES THIS POLICY DELIVER THIS?**

The Council is supportive of the inclusion of Policy 5: Community Wealth Building in NPF4. Glasgow's communities are diverse in socio-economic characteristics thus, there is some questions on how Community Wealth Building can best be expressed

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spatially across the city boundary in local development plans or whether that is an intended outcome of the policy. For example, is it focused on allowing communities to own assets and potential dispose of assets to generate cash; or land value capture; or about greater stewardship of spaces and facilities; or about using local supply chains in development procurement? The Council would welcome further elaboration on how this policy can be visualised and how or whether it can be interpreted to consider local context. It is understood that work around this has been taken forward by SCRIG that recognises the role that Community Wealth Building has beyond the remit of land use planning. To that point it would be helpful for Policy 5 to be more targeted to the areas of Community Wealth Building, such as those concerning land and assets so that LPAs can fully realise their role in supporting the policy. In addition, consideration into the new skills and method needed to implement, assess, monitor and benchmark this policy, would be welcomed.

Policy 6: Design, quality and place

### **Q 28: DO YOU AGREE THAT THIS POLICY WILL ENABLE THE PLANNING SYSTEM TO PROMOTE DESIGN, QUALITY AND PLACE ?**

The Council supports the 6 design principles expressed in Policy 6. This is a complex area of planning and requires the use of careful and precise language that can readily be used in practice. There is some concern over the usage of words and phrases such as 'joy' and 'being positive toward being playful'. Design is subjective and subject to differences of opinion. Whilst high quality design is a cornerstone of planning policy, it would be welcome if NPF4 put more emphasis on the ways in which design can and should respond to the climate emergency and the nature crisis. In doing so, high quality design could move beyond questions of aesthetics toward a more holistic view of design that would jointly address the traditional aims of design quality with design to improve quality of life outcomes.

Policy 7: Local living

### **Q 29: DO YOU AGREE THAT THIS POLICY SUFFICIENTLY ADDRESSES THE NEED TO SUPPORT LOCAL LIVING?**

The Council supports Policy 7: Local Living in principle and would suggest that it be noted that the definition in the glossary for 20-minute neighbourhoods includes the word 'often' before 'compact neighbourhoods' while the main text does not. There is a risk that if the definition is left as is it will provide a basis for the concept to be watered down or used to justify building unsustainably. Principally, the concept of a 20-minute neighbourhood is a spatial policy as it recognises that a particular way of building or shaping the environments, we live in has a multitude of positive benefits, not only for people but for responding to the climate emergency and nature crisis.

Beyond supporting the principle of 20-minute neighbourhoods and supporting proposals for 20-minute neighbourhoods, should they arise in the future, there is a concern that there is an underlying lack of economic drivers that support this style of

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development. The Council's experience of building new neighbourhoods in its boundary demonstrates the challenge around delivering facilities and services in areas of new housing delivery, especially in weak market areas. The Council has had more success in locating new development towards areas of the city where there is a historic built form that can provide local facilities and shops for residents of new housing. This is most notable in the transformational regeneration areas. The Council welcomes further guidance into how the concept of the 20-minute neighbourhood can be built in Glasgow in new places and communities and also retrofitted into areas, where such facilities were not originally provided (for example parts of the city centre or suburban development).

### Policy 8: Infrastructure First

#### **Q 30: DO YOU AGREE THAT THIS POLICY ENSURES THAT WE MAKE BEST USE OF EXISTING INFRASTRUCTURE AND TAKE AN INFRASTRUCTURE-FIRST APPROACH TO PLANNING?**

The Council strongly supports the principle of an infrastructure first approach and welcomes the inclusion of Policy 8 within NPF4. With respect to whether the policy ensures that we make the best use of existing infrastructure, there is an opportunity to consider the ways in which vacant and derelict land can be considered as part of this approach. In many cases, vacant and derelict land has existing infrastructure on-site or is readily connected into existing networks. With regard to infrastructure first in the planning of new settlements, the Council supports the policy position but suggests reconsideration be given to the use of 'should' with 'must' so as to ensure that the policy is utilised in the best way possible to achieve its aims. Further to that point, the Council has a strong record of public sector led infrastructure development that is inclusive of climate related solutions to the built environment. This should ideally be the standard for all development, regardless of whether it is private or public

The Council also recognises that there is an opportunity to more closely align Policy 8: Infrastructure First with Policy 7: Local Living and Policy 10: Sustainable Transport. It may be that a narrative summary of the enclosed policies at the beginning of each policy grouping would allow the reader to fully consider the ways in which they interact with one another and how they mutually support each other. As an example, it is recognised that patterns of car dependency, once established, are challenging to retrofit. This makes the policies around public transport and 20-minute neighbourhoods enormously relevant to this policy if we are to actualise change in the way that we build and retrofit our built environment. The use of Grampian<sup>1</sup> or suspensive conditions would ensure that housing development is phased to align with new or improved public transport provision. The Council welcomes the inclusion of the draft Infrastructure Investment Plan and other relevant plans and policies in the policy wording. It is considered that linking infrastructure first to inclusive economic growth

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For example - A planning condition attached to a decision notice that prevents the start of a development until off-site works have been completed on land not controlled by the applicant. <sup>1</sup>

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would make each policy stronger as well as aligning with the National Transport Strategy 2.

The Council also supports the consideration of adding supplemental information regarding the mechanisms to support the upfront infrastructure for development such as through the Scottish National Infrastructure Bank or other means. This would recognise that funding for infrastructure is often beyond the powers of LPAs to deliver.

Finally, the Council recommends that the policy state that Infrastructure First is inclusive of blue and green infrastructure. It is noted that in the Glossary, definitions have been provided for blue and green infrastructure but there is not a definition for Infrastructure more generally. The inclusion of a definition would be beneficial to applicants and LPAs.

### Policy 9: Quality homes

#### **Q 31: 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?**

The Council supports the overall aims of Policy 9 and believes in the main that with amendments it can support the delivery of new quality housing where it is needed. There are points that the Council wishes to raise for further consideration:

- The MATHLR figures in Draft NPF4 anticipate a continuation of recent trends of higher levels of housebuilding 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 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.
- Glasgow City operates within the Glasgow City Region functional housing market area. This is a long-established geography for managing the land supply and comes from collaborative and joint working between the 8 Clydeplan authorities over a long period. There is limited recognition in NPF of the way housing markets work across administrative boundaries and that demand dissipates over time i.e. a housing need only remains for a limited period before the new household does something different – i.e. moves elsewhere, finds a solution within the existing housing stock, personal circumstances change. There is little recognition that need and demand is dynamic and not fixed. For

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example, the HNDA tool sets a default 5 year period for need to dissipate over time. The Council would welcome greater clarity around this point.

- Building on point 2, it would be beneficial for NPF4 to clarify whether the housing targets are the number of houses expected to be built or the land that is potentially suitable should demand materialise?
- The Council seeks clarity in what part (b) a deliverable housing land pipeline [...] would mean in practice. There is a lack of clarity around whether this would be a one-off exercise or an annual task to be completed similar to the current audit process?
- The Council seeks clarity in reference to part (c). It is of note that there is currently a planning advice note (PAN) that covers site assessment. Does this policy subset intend on replacing that PAN?

The Council seeks clarity in reference to part (h) relating to affordable housing. As per the definition in the glossary, affordable housing is defined as being,

*Housing of a reasonable quality that is affordable to people on low incomes. This can include social rented, mid-market rented, shared-ownership, shared equity, housing sold at discount (including plots for self-build), self-build plots and low-cost housing without subsidy.*

It is queried that affordable housing is firstly required to be of ‘reasonable quality’ whereas throughout NPF4 multiple policies states the desire to provide and support ‘high quality’ housing. Other matters relating to this policy subsection include the 25% provision that would require to be identified in an LDP. It is not clear from the text how the LPA is to go about identifying the need for affordable housing in its area and to what extent the current measures to support affordable housing, such as through Glasgow’s strategic housing investment plan and Local Housing Strategy would interact with this new requirement. There is some concern that the introduction of a blanket requirement will provide a vehicle for the development industry to proposal additional release with the promise of contributing to affordable housing requirements. The Council requests further elaboration and consideration the points raised.

The Council seeks clarity in relation to part (f) which states that ‘new homes that improve affordability and choice should be supported’. It would be beneficial for this policy subset to be elaborated upon, specifically in relation to the above quote which appears to assert that preference should be given to applications that fulfil this aim. Clarity around whether this should be considered in isolation or within the wider context of the other policies and principles would be welcome.

The Council seeks additional consideration be given over to subsection (i) which appears to support a plan-led system. However, the following bullet point, ‘overall

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*progress in the build-out of sites included in the housing land pipeline is exceeding delivery timelines set out in the most up-to-date delivery programme for the plan'* should be understood within the wider context of market forces which are elastic and as such, planning for housing in period of high development activity may not lead to the sustainable outcomes that NPF4 generally seeks to achieve. We should recall the period from 2005-2008 when housebuilding in Glasgow was at an unprecedented level followed by a sharp downturn related to the credit crunch. If land had been released during the boom, the City would have had to live with those decisions, even when demand fell. Land supplies tend to expand anyway as activity increases, and NPF 4 should be clear that the brownfield first approach should take precedence. Any additional release should be plan-led, and linked to a mid-term Plan review, and should be evidenced by updated household projections or other information rather than granting planning permission in potentially less sustainable locations in a period of high building activity.

There is also concern that imprecision in the wording of Policy 9, as it relates to the delivery of housing, may contribute to issues in Local Development Plan preparation and implementation. In particular, the lack of clarity around some of the terms used, such as: (a) long or longer term, (b) whether the Housing Land Requirement represents the number of houses to be delivered or the land required to deliver a separate target, (c) the definition of "an identified need" in relation to affordable housing, and (d) the meaning of the term "progress to delivery" as it relates to the mechanisms proposed to identify additional housing land. The Council would welcome clarification on these matters.

Policy 10: Sustainable transport

### **Q 32: DO YOU AGREE THAT THIS POLICY WILL REDUCE THE NEED TO TRAVEL UNSUSTAINABLY, DECARBONISE OUR TRANSPORT SYSTEM AND PROMOTE ACTIVE TRAVEL CHOICES?**

The Council is generally supportive of Policy 10 and considers the success of sustainable transport to be fundamental to realising the overall ambitions in NPF4. The long-term identification and funding of incremental public transport investment including new and upgraded transport corridors and interchange facilities, as part of the infrastructure first approach, is crucial to providing the certainty required in more effectively delivering sustainable travel patterns.

This combined with greater use of accessibility mapping tools, a lack of public transport provision should become a material reason for refusal. The Strategic Transport Projects Review 2 should provide certainty regarding phasing and delivery of projects to inform local development plans.

The draft NPF4 is light on detail regarding how the role currently played by Strategic Development Plans (SDP) in informing Transport Appraisals is to be replaced. In particular, how Level 1 appraisals currently conducted at a SDP level and help inform consequent LDP level 2 appraisals should be undertaken. The reuse of historic

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infrastructure should be informed by a more nuanced sustainable transport hierarchy. The sustainable investment hierarchy should be modified to allow a more nuanced approach. Account should be taken of the potentially greater transport utility provided by public transport systems' ability to transport far greater numbers of passengers as compared with the more modest numbers associated with active travel options.

Where a transport assessment including identified mitigations, informed by greater use of accessibility mapping tools, is deemed insufficient in addressing unsustainable travel patterns, the lack of public transport provision should become a material reason for refusal. The term 'person trips' is potentially unhelpful as it bundles potential sustainable travel footfall increases – including active travel and public transport, AND less sustainable vehicular travel. A new emphasis on modal shifts and road space reallocation resulting in an increase in walking should require a transport assessment. Account should also be taken into the fact that public transport systems' offer a far greater potential to transport large numbers of passengers, as compared with the more limited utility provided by active travel options.

This policy should be more strongly worded to address the asymmetrical relationship between pedestrians and traffic. In areas of high potential pedestrian/traffic conflict, the use of continuous pavements/ footways to change the road user hierarchy and driver perceptions of movement priority should be deployed as a key component of active travel strategies, 20-minute neighbourhoods and transport hubs.

'Public transport availability mapping indicates a lack of night-time provision where night-time working patterns are required e.g. hospitals and educational facilities, entertainment and leisure facilities, and critical infrastructure facilities' and suitable night-time provision has not been provided. 'Flatted residential development must give consideration to the need to provide secure and convenient storage for range of cycle types and sizes, depending on the type, location and accessibility of the development and the likely needs of the users, and in instances where storage is not provided, justification must be provided.'

Policy 11: Heat and cooling

### **Q 33: DO YOU AGREE THAT THIS POLICY WILL HELP US ACHIEVE ZERO EMISSIONS FROM HEATING AND COOLING OUR BUILDINGS AND ADAPT TO CHANGING TEMPERATURES?**

The Council welcomes the inclusion of Policy 11: Heating and Cooling and generally agrees that this policy will help Glasgow achieve zero emissions from heating and cooling of building. As a general point, the Council would prefer that the use of 'should' in the policy wording be made more concrete to ensure the policy is understood to be necessary. The Council would also like the role of spatial planning recognised as providing the context for cross-boundary solutions. The Council also recognises that this in a policy area that will require a substantial degree of upskilling for planners and developers. The following technical points are provided:

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Subsection a) and b)

The Council recognises that there are challenges in requiring developers/development to connect to a local heat network and that ultimately legislative change would be required to change this. This is especially true in urban areas like Glasgow where existing heat networks are in place. The Council also recognises that the LHEES will require financial incentives to support developers in to connect to local networks.

Subsection c)

The Council welcomes further guidance on how the LPA would be expected to assess proposals to ensure the ability to connect at a later date and for this process to be safeguarded. However, it should also be recognised that the safeguarding of areas with long delivery time scales could leave land vacant. Meanwhile uses should be encouraged in these cases.

Any crossover with Building Standards should also be recognised in the policy where applicable.

Subsection e)

The Council seeks clarity on which party requests a Heat and Power Plan and which party would be the examiner. Clear design guidance would help applicants understand what should be expected regarding pipe runs, pipe work and connection.

Subsection g)

The Council seeks clarity on the definition of 'networked systems'. If this is outwith gas/electricity/heat networks it could render domestic biomass unworkable in an urban context.

Policy 12: Blue and green infrastructure, play and sport

**Q 34: DO YOU AGREE THAT THIS POLICY WILL HELP TO MAKE OUR PLACES GREENER, HEALTHIER, AND MORE RESILIENT TO CLIMATE CHANGE BY SUPPORTING AND ENHANCING BLUE AND GREEN INFRASTRUCTURE AND PROVIDING GOOD QUALITY LOCAL OPPORTUNITIES FOR PLAY AND SPORT?**

The Council broadly supports Policy 12: Blue and green infrastructure, play and sport. Blue and green infrastructure has a key role to play in adaptation and resilience for communities at a catchment scale and to deliver flood risk net-gain. It is not clear why "blue and green infrastructure" has been combined with "play and sport" for this policy section. Further information is welcomed in this regard.

The Council recognises the need for effective and funded maintenance plans for long-term stewardship is critical for long-term success of blue and green infrastructure. Opportunities to include elements of 'play' with blue-green infrastructure have merit, to deliver multi-functional spaces and increase awareness of, and engagement with, surface water to manage flood risk for the wider catchment.

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The Council considers that the policy wording could be elaborated upon to make clear that local context ultimately determines what can be delivered on a site.

Subsection a)

As the policy is currently worded, it is mostly applicable to rural and peri-urban sites where safeguarding land for blue and green infrastructure is likely to be more straight forward than sites in urban authorities like Glasgow. Recognising that there are challenges and opportunities in an urban setting would make the policy more inclusive.

Subsection e)

The Council's position on the retention of surplus provision of outdoor sports facilities is that these sites can still provide valuable open space for local communities especially in urban environments where such space is at a premium. Therefore, the Council's preference is for these sites to be protected for future use as open space for other needs. The wording of the final bullet point could read: "*... and that the site would be developed without detriment to the overall quality of provision or the ability of the area to meet other open space needs*".

Policy 13: Sustainable flood risk and water management

**Q 35: 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 Council generally supports Policy 13 and recognises flood risk management as a key issue in Glasgow specifically as it relates to surface water as well as the Future Functional Floodplain. The Council considers that proposals for new development should include consideration of what contribution the development can make to increasing resilience of the existing wider community / catchment, both upstream and downstream, to provide flood risk net gain.

Urban creep is a significant challenge for urban areas, and national policy to control small scale extensions and alterations to existing buildings would be welcomed. Whilst, at an individual level, the impact on flood risk may not be significant, the combined impact of loss of permeable surfaces at multiple locations within a catchment (that may span more than one planning authority) will only be detrimental and increase flood risk over time, particularly if permitted development regulations are further relaxed. Requiring or incentivising the local capture and re-use of rainwater at an individual plot level would also be beneficial to both reduce flood risk and reduce demand for potable water. Where possible rainwater storage / attenuation systems could be made 'smart' to empty ahead of storm events and maximise the volume of storage available.

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There is a need to recognise that many of the best locations for low carbon development are also where there is flood risk (along the banks of the Clyde) and therefore should seek to balance mitigation and adaptation.

The Council recognises the inclusion of the concept of Future Functional Floodplain in policy would result in a significant increase in the area of land constrained by flood risk along the river within Glasgow. At present the Functional Floodplain for the River Clyde within the City, as determined by the 1:200 extent, is a constraint that can be designed around as it generally affects less than 25% of site area. The introduction of Future Functional Floodplain (FFP) would result in the constraint affecting well over 50% of most development sites. This in combination with Land Use Vulnerability which inhibits redevelopment of vacant land would render sites virtually undevelopable. Where development was permitted the requirement to have occupied floor uses above Future Functional Floodplain plus Freeboard would require development on a plinth and lead to a sterile ground floor that adds nothing to place quality. As such, the Council strongly suggests that Policy 13 needs to allow for a proportionate response to flood risk that recognises the hazards posed by different types of flooding and recognises that different approaches may be acceptable depending on the nature of the risk. Coastal flooding by its nature is predictable and lasts for a short duration around high tide. As written, the policy would potentially undermine the position reached earlier between SEPA and the Council whereby there was recognition that a proportionate response to coastal flood risk involving siting buildings outside of FFP, careful consideration of land use vulnerability at the ground floor, flood resilient design and flood warning/evacuation procedures. This was set out into Masterplan Principles, agreed with SEPA. If policy 13 was applied in its current form to Glasgow's River Clyde corridor, it would represent a major constraint to the long-term regeneration of the city and West of Scotland and challenge the compact city and brownfield first approaches.

Policies 14 and 15: Health, wellbeing and safety

**Q 36: DO YOU AGREE THAT THIS POLICY WILL ENSURE PLACES SUPPORT HEALTH, WELLBEING AND SAFETY, AND STRENGTHEN THE RESILIENCE OF COMMUNITIES.**

Policy 14 is a welcome addition to NPF4 and is considered an important cornerstone of planning practice. The general policy wording is positive and non-controversial. It is perhaps overly simplistic to the ways in which the built environment influences people's health and wellbeing. Whilst it is encouraging that the provision of health and social care facilities, direct health effects of buildings including impacts on air quality and noise, is accounted for, it would be welcome if this policy was more proactive and less reliant on development management which is reactive. It would also be valuable if greater links to other policy areas such as economic development and access to education/resource which have a large impact on people's overall health and wellbeing, were made. It is welcome that Health Impact Assessments (HIAs and Health Integrated Impact Assessments HIAs) have been added to the policy as they

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have the potential to change policy and practice. Recognition is needed that this will require additional/new skills and resources to implement. The Scottish place standard tool can have the conversations about how a place impacts on health and wellbeing of every citizen within that place and will also be very valuable.

Policy 15 – Safety, is a welcome addition, but does not include the safety impacts that climate change will bring – flooding, hotter climate, etc. the climate emergency will have a huge impact not only on place and people safety but on human health and wellbeing as well. This should also be considered as part of this policy.

In the main, the Council supports the overall positioning of Policy 14 and 15. The Council welcomes further consideration on the points raised in the above paragraphs which it feels would provide a more rounded view of how health and wellbeing are impacted by the built environment.

### **Productive Places**

Policy 16: Land and premises for business and employment

**Q 37: 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?**

The Council is generally supportive of Policy 16. As has previously been noted, a clear vision statement at the beginning of each policy subsection would benefit the reader and could provide a clear statement for how the suite of policies in the subsection would be expected to work together toward shared goals. Alternatively, the text statements at the beginning of the document (page 8 in the case of Productive Places) would also be of benefit to the reader.

With respect to Policy 16, the Council is of the opinion that the description of the policy falls short of the spatial opportunities and challenges that exist with business and employment land. There is not a clear enough link with the national developments which, if done, would make this policy more complete and provide a spatial element to the policy that is currently weaker. The national developments do offer more by way of explanation for the types of changes that may be seen in our industry and business land but as they are absent from the policy section a clear link is not being made.

In a Glasgow context, there is developing awareness for the land demands particularly in relation to our innovation districts, enterprise space and the city's key sectors of health/life science, digital/tech and space. Alongside this, the demand for storage/distribution and logistics needs to be understood. The Council recommends that the policy be further developed to be inclusive of the future land demands across Scotland to 2045 while still providing enough flexibility for future technological change to be accounted for.

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From a technical view, Policy 16 appears to be missing an explicit directive for LDPs to allocate or protect business and industry land. The Council welcomes consideration for adding this to the policy to align it with the LDP regulations.

Policy 17: Sustainable tourism

### **Q 38: DO YOU AGREE THAT THIS POLICY WILL HELP TO INSPIRE PEOPLE TO VISIT SCOTLAND, AND SUPPORT SUSTAINABLE TOURISM WHICH BENEFITS LOCAL PEOPLE AND IS CONSISTENT WITH OUR NET-ZERO AND NATURE COMMITMENTS?**

The Council is broadly supportive of Policy 17. Further clarity regarding what is meant by 'sustainable tourism' would help with understanding how the policy is positioned. It is understood that the policy currently emphasises the importance of managing the potential negative effects of the tourism industry which is understandable given that in some cases Scotland's most popular tourist destinations are adversely impact local communities. The Council would however prefer a tourism policy that also took a holistic and proactive view of the industry, considering not only how it can be managed but also how it can help contribute to the overall aims of NPF4 as it relates to the climate emergency and nature crisis. This feels particularly underdeveloped. The Council would welcome consideration for how the policy could support the drive toward net zero, through innovative zero carbon design, nature restoration and/or green tourism.

As tourism specifically relates to Glasgow, our city has traditionally relied on large events and there are questions around how the city can boost its hotel capacity to cater to the growth of this. It would be welcome if NPF4 provided support for growing tourism sustainability in places that are not oversaturated such as Glasgow which would have multiple benefits for the city and Scotland.

Policy 18: Culture and creativity

### **Q 39: DO YOU AGREE THAT THIS POLICY SUPPORTS OUR PLACES TO REFLECT AND FACILITATE ENJOYMENT OF, AND INVESTMENT IN, OUR COLLECTIVE CULTURE AND CREATIVITY?**

Glasgow supports a large and diverse arts and culture sector. As such, the Council welcomes and supports Policy 18 and considers the policies proposed are well established in the main. Specifically, the public art sub-policy is a welcome addition. The Council recognises the agent of change principle as codified in the Planning Scotland Act 2019 and is supportive of this principle.

The Council is of the opinion that the policy is supportive of the creative arts and culture but there are no specific mechanisms within the policy that would enable direct investment as per question 39. The Council welcomes further consideration of this point.

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Policy 19: Green energy

**Q 40: 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 Council broadly supports Policy 19: Green energy and recognises the importance of continuing to prioritise emissions reduction in the energy sector to achieve Net Zero. The Council also recognises the net zero carbon must be system and holistic and overall sustainability needs to be higher on the agenda.

The Council would like clarification on matters specified below:

- a) Local development plans *should seek to ensure that an area's full potential for electricity and heat from renewable sources is achieved.*

Comment: The Council requests that 'full potential' be elaborated upon for clarification of purpose. The Council understands that there may be gaps with the spatial scalability of LHEES and that a gap between the baseline LDP data and LHEES could create issues. Secondly, it is recognised that energy planning is a specialist skill and not one that is widely present within local authorities. There is a question of resourcing required for this in order to fully realise the policy goals. From the Council's experience there is often a mismatch in the lead in time and delivery of renewable heat projects with development proposals and planning applications. As such, the Council recommends that NPF4 ties in Policy 19 in with the relevant policies concerning new buildings.

- f) Development proposals for small scale renewable energy generation technology should be supported.

Comment: The Council welcomes this policy subsection and recommends that an assessment criteria is developed for planning alongside guidance for applicant on the siting of the technology. The criteria should take account of listed buildings, conservation areas and flatted development where there may be a need to site the technology in communal areas such as back courts or attic spaces.

- h) Major applications for energy generation from low carbon sources, for manufacturing or industrial developments should be accompanied by a decarbonisation strategy to demonstrate how greenhouse gas emissions from the process are appropriately abated. That strategy may include carbon capture and storage.

Comment: The Council questions who would assess the adequacy of a decarbonisation strategy? At present this is not a skill that is within Planning or Local Authorities.

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i) Proposals for negative emissions technologies and carbon capture should be supported in principle.

Comment: The Council agrees with subsection (i) in principle but believes that more guidance would be required on how this would apply in an urban setting. Guidance is required relating to both siting and assessment as well as the type of technology and contribution to carbon emission reduction. The Council queries whether SEPA would be involved in assessing the adequacy of the proposal as local authorities do not have the skillset to do this.

j) Development proposals for solar arrays should be supported where the planning authority is satisfied that the arrays would not adversely affect (including the effect of glint and glare) residential amenity, road safety, historic environment assets, or aviation interests. Ground mounted arrays should be installed using pile driven or screw foundations rather than trench foundations to facilitate restoration of the site.

Comment: The Council supports this sub-policy and would encourage consideration for adding additional wording that seeks to deliver ecological benefits on sites specifically with solar arrays and other technologies. As an urban authority, the Council recognises that our sites that would support this technology should be multi-functional and have co-benefits for residents. It is recognised that there is often a tension over the use of land and which has priority. This could be mediated through a proactive and supportive policy approach that seeks to balance competing uses on land.

k) Specific considerations will vary relative to the scale of the proposal and area characteristics but development proposals for renewable energy developments must take into account [...]

Comment: The Council agrees with sub-policy k) and requests that more guidance be developed as regards decommissioning and restoration of sites. Both SEPA and Nature Scot could ensure that the requirements are understood by all parties and that appropriate conditions can be achieved. Guidance would also be welcome regarding how decommissioning would fit within the wider scope of the circular economy. The Council agrees that 'robust planning obligations that ensure that operators can achieve site restoration' are required and requests more information be made available to local authorities on how best to put this into practice.

Policy 20: Zero waste

**Q 41: 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?**

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The Council broadly supports the principles of policy 20 regarding zero waste and recognises its overall importance in transitioning to a low carbon and circular economy. The Council has published a Circular Economy Strategy which sets out a framework and vision for circular and zero waste in the city. The Council considers that the overall intention of the policy is comprehensive but has concerns over how it would be implemented and who would be responsible for various requirements. The Council notes that much of the responsibilities currently sit outwith the role of planning departments and may be better suited to Building Standards. The Council is of the opinion that national level guidance that uses industry accepted standards should be developed to ensure compliance. The Council recognises that many items are likely to require planning conditions and that the extent of the checks on these conditions is likely to be onerous and over a long period of time.

The Council is concerned that the policy does not cover waste soil and the reduction and reuse of soil or cross boundary considerations. This is also an important consideration of circular economy.

Specifically, the Council welcomes clarity on the following items:

Subsection a)

- Are LPAs required to identify energy from waste sites for the LDP?

Subsection b)

- Will Building Standards be required to perform checks at building warrant and completion stage to ensure compliance?
- Will guidance be provided on the scope of community benefits as they relate to Policy 20?

Subsection c)

- Which body would check and monitor site waste management plans?
- Who is the responsible body to monitor the performance of the circular economy?

Subsection e)

- Who sets and monitors the acceptable limits for environmental (including cumulative) impacts relating to noise, dust, smells, pest control and pollution of land, air and water?
- Whose role is the monitoring of greenhouse gas emissions resulting from the processing and transportation of wastes to and from the facility to ensure they are minimised and offset?
- Will the SG provide guidance on adequate buffer zones between sites and settlements?

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- Who would hold the financial bond and the liability for the restoration of the site of a failed operator?

Subsection i)

- Which body would decide if a decarbonisation strategy is insufficient?
- Which body will evaluate the Heat and Power Plan as well as checking and monitoring facilities once operational?

Policy 21: Aquaculture

### **Q 42: DO YOU AGREE THAT THIS POLICY WILL SUPPORT INVESTMENT IN AQUACULTURE AND MINIMISE ITS POTENTIAL IMPACTS ON THE ENVIRONMENT?**

The Council notes the inclusion of policy 21 in the framework and has no specific comments it wants to raise.

Policy 22: Minerals

### **Q 43: DO YOU AGREE THAT THIS POLICY WILL SUPPORT THE SUSTAINABLE MANAGEMENT OF RESOURCES AND MINIMISE THE IMPACTS OF EXTRACTION OF MINERALS ON COMMUNITIES AND THE ENVIRONMENT?**

The Council notes the inclusion of policy 22 in the framework and has a minor comment on sub-policy (d) and the first bullet point. This should include consideration to impact on 'geodiversity' alongside the other matters.

Policy 23: Digital infrastructure

### **Q 44: DO YOU AGREE THAT THIS POLICY ENSURES ALL OF OUR PLACES WILL BE DIGITALLY CONNECTED?**

The Council broadly supports the positions of Policy 23. The Council believes that digital connectivity should be people centred as much as it is about place and the economy. Access to digital infrastructure extends to issues around affordability as well as well as physical infrastructure, a point that could be better clarified in the policy wording. The Council would encourage more wording expressing this in the policy.

As per subsection e) the Council recognises that the information on the impact of development proposals on existing digital infrastructure is not easy to obtain and recommends that appropriate mitigation measures should be sought before any

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development proposals which may have an adverse effect on the operation of digital infrastructure are approved.

Policies 24 to 27: Distinctive places

### **Q 45: DO YOU AGREE THAT THESE POLICIES WILL ENSURE SCOTLAND'S PLACES WILL SUPPORT LOW CARBON URBAN LIVING?**

The Council broadly supports Policies 24-27 relating to city, town, commercial and local centres. The Council recognises that town centres play a vital role in public life and culture. Centres have been in a near continuous state of evolution over previous decades due to technological advances in the way we consume goods and services. The pace of this evolution is unlikely to change and has accelerated due to Covid-19. Thus, the Council welcomes the wording around adaptation and believes that it will enable LPAs to be more flexible in helping to shape the future of centres. The Council recognises that the past and present way of building new settlements at low density and without supporting uses that local residents can readily access without a car or public transport has deleterious effects on a number of factors that NPF4 specifically seeks to address, including the climate emergency, nature crisis, as well as health and well-being. There is recognition that as much as new settlements will be required to be built differently, in Glasgow there is also a requirement to consider policy support and approaches to retrofitting existing environments that support low carbon urban living. As noted in our response to Policy 7: Local Living, the Council has over the previous decades led on large regeneration schemes that demonstrate the principles of good urban design and a people-centred approach to planning new settlements. Clyde Gateway, the Commonwealth Games Village, Laurieston TRA, the new Gorbals, and Sighthill offer exemplar case studies for developing new frameworks for building differently across the urban environment.

#### **Policy 24: Centres**

In relation to subsection a) the Council recommends considering a standalone policy for city centres. Scotland's city centres are unique and standalone by virtue of their scale and the role they play in wider regional economies. The Council considers that NPF should recognise that City Centres present different challenges that warrant different policy approaches to support them.

Further to the above point, the Council would welcome recognition in the centres policy that cities like Glasgow are made up a series of neighbourhoods and centres that serve various populations depending on their scale. This is a distinct geography that is not immediately comparable to town centres in rural contexts with large distances between areas/centres and well-defined boundaries. The Council considers that there is an opportunity to distinguish and provide a standalone policy that is representative of the unique dynamics at play in a city's network of centres. Additionally, Glasgow's local centres provide much of the facilities and business uses that a 20-minute neighbourhood would seek to capture yet they exist within a large network across the

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city's geography. This should ideally be recognised in policy.

With regard to policy subset b) the Council is supportive of the aim in expanding the range of uses in town centres and believes that planning has an important role to play in determining what the right mix of uses is to ensure the long-term vitality and sustainability of centres. The Council believes that this function should be upheld for LPAs to guide the future mix of uses that is contextual and responsive to local circumstances.

### **Policy 25: Retail**

The Council seeks clarity around the purpose of a stand-alone retail policy. It is not clear why these policies have been given their own policy in light of the previous statement's position regarding vitality, viability and supporting a mix of uses in centres. Nevertheless, the Council is generally supportive of the subsections. The Council also recognises the floor space requirements for retail uses are generally downsizing as a response to technological changes in the way people shop. This should be recognised in policy and should support historic shops that might better fit into future retail business models.

#### Subsection a)

- It is not clear whether NPF4 would maintain the sequential test for preferring town centre locations?
- The Council recognises that some of Glasgow's neighbourhoods are currently underserved by the provision of locally accessible shopping facilities. If out-of-town locations are no longer to be supported (as well as edge of centre/commercial centres), the Council recommends that further guidance be developed that asserts how new centres or redeveloped centres in city's neighbourhoods can be supported. This would enable the Council to continue to support retail proposals whilst limiting the expansion of car-based big-box style retailing.

#### Subsection b)

- The Council agrees that the design and layout of commercial/mixed used developments is an important consideration in considering their impact on the character and amenity of an area. It is considered that a close tie-in to Policy 6 would ensure that proposals are designed in such a way that do not prioritise the movement of cars over pedestrians. This could include specific guidance relating to the siting of car parks and establishing principles of design that seek to improve the amenity and character of the surrounding area and prioritise public realm and pedestrian access.

Subsection c)

- The Council considers that the provision relating to non-retail uses would sit more effectively in Policy 24.

Subsection d)

- The Council seeks clarity on the definition of 'neighbourhood shopping proposals'.

### **Policy 26 Town Centres First**

Subsection a)

The Council is supportive of the town centre first assessment for other uses. However, the policy could be made clearer in terms of its implementation. It is not clear how the policy is expected to interact with other spatial policies directing development such as the policy around local living. Where there is significant demand for non-retail uses the Council would support the creation of new town centres that are of a scale that supports neighbourhood sustainability.

The Council recognises that it has been difficult in the past to enforce the requirement to demonstrate that a proposal cannot be altered or reduced in scale to fit into an existing centre. NPF4 should provide LPAs with a framework of creative solutions that enables economic development whilst maintaining the overarching goals relating to the local living principle.

The Council recognises that there is presently a methodology for assessing the impact of retail proposals on town centres but there is no equivalent for other town centre uses. Clarification on this point is welcome.

The Council seeks clarification on how 'significant' would be measured as it relates to vitality and viability, action to tackle climate change, additional journeys with reliance on the private car, travel generating uses and footfall, respectively.

The Council seeks clarification regarding policies relating to business parks. Would business parks fall under policy 26 and if so would support for current business parks and the creation of future business parks be supported in this policy?

### **Policy 27 Town Centre Living**

Subsection a)

The Council considers that policy 27 should be revised to support a clear vision for the development of residential housing in town centres. The Council is concerned that as



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it is currently written, support for town centre living as a blanket policy could undermine the vitality and overall function of a town centre. Whilst the Council supports the conversion of upper floors in town centre locations it is recognised that there are often significant issues surrounding residential amenity that currently limit the viability of such development. This is especially true in denser environments and when dealing with buildings which were not designed to be residences. The Council welcomes further consideration from the Scottish Government on how LPAs can mitigate these impediments by reviewing these barriers and considering alternative approaches.

Subsection d)

The Council is concerned that the principle of supporting conversion of ground floor shops to residential use could have the opposite intended effect of the policy by adding residential units in a way that is not sustainable to the long-term success of a centre. From the Council's experience, when a ground floor unit is lost to residential it is unlikely to ever be brought back into use as a shop. As such, strict controls should be made available to LPAs to use this policy at their discretion so that the repopulation of a town centre does not come at the cost of its overall vitality and functional purpose.

Finally, the Council recommends that all ground floor uses should have active frontages to encourage town centre vitality. Ideally this would be provided in Policy 24.

Policy 28: Historic assets and places

### **Q 46: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND ENHANCE OUR HISTORIC ENVIRONMENT, AND SUPPORT THE RE-USE OF REDUNDANT OR NEGLECTED HISTORIC BUILDINGS?**

The Council recognises this as an important policy and a theme which has strong cross-party support. The Council welcomes further consideration for how this policy can be more responsive to the climate emergency and the nature crisis. There is a general apprehension that the policy falls short for areas without the protections afforded to conservation areas and listed buildings. This could see the continued demolition of the historic environment (non-designated) which the Council recognises as being both a culturally sensitive issue as well as one that potentially undermines the overall aims of NPF4 to tackle the climate emergency and nature crisis and support the circular economy. The Council recognises that there is likely to be continued pressure to demolish historic assets (regardless of status) and that this requires a considered and proactive approach that utilises a number of levers to support the re-use and adaptation of all existing historic assets. The Council would like to see stronger policy wording that prioritises and encourages re-use and adaptation and limits the viability of demolition, perhaps through a 'demolition last' approach. This is also related to an issue where buildings have been purposely neglected which results in demolition being the only remaining option. This would serve to recognise and elevate the historic environment as a fundamental element in responding the climate emergency and nature crisis.

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Subsection c)

“Exceptional circumstances” and “all reasonable efforts” should include definitions, e.g. a reference, for example to structural condition reports, development appraisals and costings, viability statements etc.

Policy 29: Urban edges and the green belt

**Q 47: 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 Council considers that the narrative text explaining greenbelts could be revised to provide a more expansive view on where the use of a greenbelt is necessary and how and for what purpose it should be used, building on the text in subsection a). The Council also welcomes further guidance or elaboration on how Policy 29 interacts or can support Policies 7, 9, and 24-27.

Subsection b)

The Council recognises that there might sometimes be room for exceptions other than those listed in subsection b) – for example, development proposals that would be bad neighbours in a built-up environment and those have been previously accepted as consistent with a green belt location, such as dog or cat kennels. The Council recommends revising the policy to be inclusive of the above.

Policy 30: Vacant and derelict land

**Q 48: DO YOU AGREE THAT THIS POLICY WILL HELP TO PROACTIVELY ENABLE THE REUSE OF VACANT AND DERELICT LAND AND BUILDINGS?**

Vacant and derelict land (VDL) remains a key issue for the Glasgow with around 55% of people living within 500m of a vacant or derelict site. The Council strongly 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 very 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. The Council suggest that the policy should support the prioritisation of action to vacant sites and buildings in prominent locations, that affect local communities. The Council reemphasises the

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comments made above for policy 13, regarding the introduction of the 'future functional floodplain', which create a significant challenge to vacant and derelict land renewal within the river corridor in Glasgow.

The Council believes that public subsidy for the development of vacant and derelict land is essential to resolving this issue. Whilst progress has been made, the scale of the issue in Glasgow is such that without prioritisation of resources, there is a concern that the policy does not go far enough in identifying the problems and providing solutions that can move the planning system toward a more proactive approach to the redevelopment of VDL.

Subsection b)

Whilst the Council generally agrees with this approach it should be recognised that a planning application does not always result in development. As such there is a risk that this policy could fall short of its desired aims. The Council also requests that consideration for design be reiterated in this subsection.

Subsection c)

The Council understands the tie-in with Policy 29. It should be made clear that this does not apply to proposals for allocated sites on greenbelt which have been deemed appropriate in the LDP.

Subsection e)

The Council agrees with this statement. "Demolition should be regarded as the least preferred option" should also apply to Policy 28: Historic assets and places. If it is considered appropriate, then the following qualifying statement would be of use:

"unless it can be clearly demonstrated that demolition is in the long-term interest in relation to climate change/sustainability/net zero targets etc."

Policy 31: Rural places

### **Q 49: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT RURAL PLACES CAN BE VIBRANT AND SUSTAINABLE?**

The Council does not have a specific comment on this policy.

Policy 32: Natural places

### **Q 50: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND RESTORE NATURAL PLACES?**

The Council broadly supports the intention of Policy 32: Natural Places. The intent of Policy 32 is to protect and restore natural places. Its wording, The Council would prefer greater cross referencing with Policy 3 and should highlight biodiversity.

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### Subsection b)

The Council seeks clarity with regard to how LPAs will determine when an impact would be unacceptable. The Council welcomes further direction in this regard and as stated above, this policy should be strongly linked to Policy 3/ NatureScot related guidance and linked to the enhancement/net gains objectives in Policy 3.

### Subsection g)

The Council is concerned that the wording in this section could seriously undermine the entirety of Policy 32 in Glasgow, as well as Policy 3 and Policy 12, by permitting development of 'local importance' in Local Nature Conservation Site and Local Landscape Area designations that would otherwise be acceptable on social, environmental, and economic grounds. As stated above, Glasgow's local designations are the backbone of its nature networks. There is a great risk that a proposal of 'local importance' is left open to interpretation. The Council requests that this subsection be revised to ensure that Glasgow's local designations are protected in line with the rest of the policy wording.

### Subsection h)

The Council supports the precautionary principle. However, the Council believes that it should be applied at all locally or statutory designated sites, protected species or priority areas and habitats in addition to nationally and internationally significant assets.

### Policy 33: Peat and carbon rich soils

#### **Q 51: DO YOU AGREE THAT THIS POLICY PROTECTS CARBON RICH SOILS AND SUPPORTS THE PRESERVATION AND RESTORATION OF PEATLANDS?**

The Council broadly supports Policy 33. The Council believes there is an opportunity to denote soil regeneration through agricultural practices that can convert poor soils into carbon rich soil. Further technical amendments are requested below:

### Subsection b)

The Council believes that the policy wording should be stronger, requiring demonstration that development is essential and that construction methods should minimise the disturbance to soils through specific techniques such as piling.

### Subsection c)

The Council believes the wording could be strengthened to include the need to complete peat profiling which in addition to depth, quality and stability would also

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include identification of physical characteristics (and their variation) with cross sections (showing depth/lateral extent/physical variation).

The Council requests clarification on what is meant by the word displaced. If it is with regard to removal, would the peat be categorised as waste, falling under SEPA guidance?

Policy 34: Trees, woodland and forestry

### **Q 52: DO YOU AGREE THAT THIS POLICY WILL EXPAND WOODLAND COVER AND PROTECT EXISTING WOODLAND?**

The Council broadly supports Policy 34. The Council recognises the importance that trees and woodlands will have in responding to the Climate Emergency and the Nature crisis. The Council also recognises that urban trees form an important component to our cities and towns and would like to see explicit support for planting trees in urban environments as a means of expanding canopy cover which would simultaneously address the climate and nature crises and creating healthier more attractive urban environments.

Subsection a)

Clarity is sought over whether the LDPs identifying and protecting existing woodland would be duplicating the associated Forestry and Woodland Strategy.

Subsection c)

The Council requests that the wording be tighter requiring developers to understand that there are financial implications for removing woodland and should be required to plan 3 trees for every 1 removed as a standard practice.

Policy 35: Coasts

### **Q 53: DO YOU AGREE THAT THIS POLICY WILL HELP OUR COASTAL AREAS ADAPT TO CLIMATE CHANGE AND SUPPORT THE SUSTAINABLE DEVELOPMENT OF COASTAL COMMUNITIES?**

The Council is supportive of Policy 35. As the River Clyde is connected to the Firth of Clyde Estuary and is tidal, it is expected that Glasgow's LDP should consider adaptation along the Clyde River and Firth in collaboration with surrounding Regional Authorities.

## **Part 4 - Delivery**

Delivering our spatial strategy

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**Q 54: DO YOU AGREE WITH OUR PROPOSED PRIORITIES FOR THE DELIVERY OF THE SPATIAL STRATEGY?**

The Council supports the overall thrust of the proposed priorities for the delivery of the spatial strategy. The Council believes that it is essential to provide confidence to all sectors involved in the built environment and to demonstrate that the relevant actions, mechanism, and responsibilities are clear to move them from paper to the ground. Overall, the Council believes that more detail is required in Part 4.

Whilst the Council acknowledges there is a need to align resources in order to deliver NPF4, it is considered that there is an overall lack of consideration for the scale of resourcing required to deliver the strategy. There are real concerns over the need for upskilling the planning workforce as well as the need to draw in other specialisms to deliver the strategy. The Council welcomes and agrees with the Infrastructure First approach in NPF4 whilst recognising that this presupposes that resources to deliver the infrastructure will require co-ordination with different agencies and other actors in the built environment industry.

The Council believes that NPF4 should set out, in the delivery section, topic areas which need further guidance and interpretation, and identify who is responsible for providing it, whether the Scottish Government themselves, national agencies, or individual planning authorities. A statement from the Scottish Government on the delivery of the National Developments regarding resourcing, powers and governance would also be welcomed.

Delivery mechanisms such as 'compulsory purchase orders' and 'compulsory sales orders' have strong cross-party support in Glasgow, as an effective means of supporting a range of policy intents and outcomes.

**Q 55: DO YOU HAVE ANY OTHER COMMENTS ON THE DELIVERY OF THE SPATIAL STRATEGY?**

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 expressed interest to the Scottish Futures Trust, who are helping facilitate engagement.

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.

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.

## **Part 5 - Annexes**

### Annex A

**Q 56: 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?**

The Council agrees that the measures identified will contribute to their respective section of 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997.

### Annex B

**Q 57: DO YOU AGREE WITH THE MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR) NUMBERS?**

Glasgow City Council, along with the 7 other Glasgow City Region Housing Market Partnership (GCR HMP) local authorities, approached and engaged in the MATHLR consultation collaboratively, in keeping with our shared understanding of the functional Housing Market which operates across the region and to mirror our historic approach to work together on such matters. The MATHLR, as shown in NPF, reflects our September 2021 submission which accepted the Scottish Government's view of the prevailing state of the Scottish Housing Market and Economy and was conditional on conclusion of the GCR HMP HNDA3 when a politically endorsed consultation response would be provided with a firmer view of the Housing Estimates and Land Requirements.

The conditional endorsement also applied to the lack of clarity about what the MATHLR figure would actually be used for. While it includes the word 'land' in the acronym, it remains unclear whether the MATHLR is actually expected to represent a land requirement (which has a redundancy addition to make it higher than the number of homes that will be needed) or whether it is the minimum number of homes to be

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built (as indicated by its renaming as a ‘housing target’ in policy 9 and to which an additional land redundancy must be added).

The GCR HMP engaged and responded to the MATHLR process in good faith without an insight into how *it* was to be used or how *it* was intended to differ from the established method for identifying housing needs and demands – the Housing Needs and Demand Assessment (HNDA). This key issue remains outstanding. What is the purpose of the MATHLR? When does it apply? How does it differ from the Housing Land Requirement and how does it differ from the ‘housing target’? How does it differ from the ‘deliverable housing land pipeline’? How would a shortfall/surplus be calculated, either at plan adoption, or at any point throughout the plan period? These are key matters that must be outlined before the MATHLR numbers can be assessed as appropriate or not.

The HNDA is a statutory requirement and a key evidence base informing the preparation of a local housing strategy and local development plan. It follows Scottish Government guidance to undertake a comprehensive assessment of housing needs and demands in an area, including understanding the housing stock conditions, identifying specialist housing needs, as well as estimating a range within which the number (and tenure) of additional homes that will be required can be identified. It involves taking evidence from a wide range of sources and stakeholders. It is also subject to an evaluation process whereby Scottish Government review the HNDA and make an appraisal of whether the HNDA fulfils the guidance requirements and is “robust and credible”. It identifies how many homes will be needed. Glasgow committed to completing this process and using it to inform future plans and we have been assured by Scottish Government officers that this will not be redundant work.

### Annex C

#### **Q 58: DO YOU AGREE WITH THE DEFINITIONS SET OUT IN THE GLOSSARY? ARE THERE ANY OTHER TERMS IT WOULD BE USEFUL TO INCLUDE IN THE GLOSSARY?**

The definition of Green networks in SPP includes reference to green infrastructure which the SPP glossary specified includes blue features. The new definition of green networks in NPF 4 still includes reference to green infrastructure but the new definition of green infrastructure does not refer to either blue or green features but “features or spaces within the natural and built environments that provide a range of ecosystem services”. We recognise this as including blue, green and other features, but would benefit from clarity.

The following terms are suggested for inclusion in the glossary:

- Planning Framework;
- Development Plan;
- Congestion ;
- Urban Mass / Rapid Transit Networks;
- Glasgow Metro (Clyde Metro) and multi-modal connectivity.

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## INTEGRATED IMPACT ASSESSMENTS

### Environmental Report

**Q 59: WHAT ARE YOUR VIEWS ON THE ACCURACY AND SCOPE OF THE ENVIRONMENTAL BASELINE SET OUT IN THE ENVIRONMENTAL REPORT?**

**Q 60: WHAT ARE YOUR VIEWS ON THE PREDICTED ENVIRONMENTAL EFFECTS OF THE DRAFT NPF4 AS SET OUT IN THE ENVIRONMENTAL REPORT? PLEASE GIVE DETAILS OF ANY ADDITIONAL RELEVANT SOURCES.**

**Q 61: WHAT ARE YOUR VIEWS ON THE POTENTIAL HEALTH EFFECTS OF THE PROPOSED NATIONAL DEVELOPMENTS AS SET OUT IN THE ENVIRONMENTAL REPORT?**

**Q 62: WHAT ARE YOUR VIEWS ON THE ASSESSMENT OF ALTERNATIVES AS SET OUT IN THE ENVIRONMENTAL REPORT?**

**Q 63: WHAT ARE YOUR VIEWS ON THE PROPOSALS FOR MITIGATION, ENHANCEMENT AND MONITORING OF THE ENVIRONMENTAL EFFECTS SET OUT IN THE ENVIRONMENTAL REPORT?**

The Council welcomes the inclusion of the Integrated Impact Assessments and has no specific comments we would wish to raise.

### Society and Equalities Impact Assessment

**Q 64: WHAT ARE YOUR VIEWS ON THE EVIDENCE AND INFORMATION TO INFORM THE SOCIETY AND EQUALITIES IMPACT ASSESSMENT?**

**Q 65: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE EQUALITIES IMPACT ASSESSMENT?**

**Q 66: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE CHILDREN'S RIGHTS AND WELLBEING IMPACT ASSESSMENT?**

**Q 67: DO YOU HAVE ANY COMMENTS ON THE FAIRER SCOTLAND DUTY AND THE DRAFT NPF4?**

**Q 68: DO YOU HAVE ANY COMMENTS ON THE CONSIDERATION OF HUMAN RIGHTS AND THE DRAFT NPF4?**

**Q 69: DO YOU HAVE ANY COMMENTS ON THE ISLANDS IMPACT ASSESSMENT?**

The Council welcomes the inclusion of the Society and Equalities Impact Assessment and has no specific comments we would wish to raise.

Business and Regulatory Impact Assessment

**Q 70: DO YOU HAVE ANY COMMENTS ON THE PARTIAL BUSINESS AND REGULATORY IMPACT ASSESSMENT?**

The Council welcomes the inclusion of the Business and Regulatory Impact Assessment and has no specific comments we would wish to raise.

CONSULTATION QUESTIONS ENDS