

Glasgow and the Clyde Valley Strategic Development Planning Authority

**To: Glasgow and the Clyde Valley Strategic Development Planning Authority
Joint Committee**

On: 12th December 2022

Report by

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Revised Draft National Planning Framework 4

1. Summary

- 1.1 The purpose of this report is for the Joint Committee to note the laying in Parliament by the Scottish Government of the Revised Draft National Planning Framework 4 (NPF4) on 8th November 2022 and to consider the Clydeplan Core Team implications for staffing in support of the future delivery of the Regional Spatial Strategy (RSS) and wider city region joint working agenda.

2. Recommendations

- 2.1 It is recommended that the Joint Committee are asked to consider the report and note
- the publication of the Revised Draft NPF4 and timetable for parliamentary scrutiny;
 - the Scottish Government's timetable for the preparation of RSS guidance; and,
 - given upcoming retirements the intention to review the staffing structure of the Clydeplan Core Team to take account of the implications of the new regional and local planning duties arising from the Planning (Scotland) Act 2019 and the wider city region joint working agenda and to note that a further report will be brought to a future meeting of the Joint Committee.

3. Context

- 3.1 The NPF4 is a long-term plan for Scotland to 2045 that sets out where development and infrastructure is needed. For the first time once approved it will form part of the statutory Development Plan along with the Local Development Plan.

- 3.2 In a regional context the Planning (Scotland) Act 2019 set out a duty for one or more local authorities to prepare a Regional Spatial Strategy (RSS) though unlike its predecessor the Strategic Development Plan the RSS won't form part of the statutory Development Plan.

4. Draft NPF4 Consultation

- 4.1 Consultation on the initial Draft NPF4 closed on 31st March 2022 with some 761 responses received, including the Joint Committee's response. The responses were analysed by the Scottish Government who have prepared a 248 page explanatory document which sets out:

- the consultation undertaken;
- a summary of representations received; and
- the changes made to the Draft as a result of the consultation.

- 4.2 The explanatory note can be viewed at <https://www.gov.scot/publications/national-planning-framework-4-explanatory-report/documents/>

5. Revised Draft NPF4

- 5.1 The Draft NPF4 consisted of 5 parts, namely

- Part 1 - A National Spatial Strategy for Scotland 2045;
- Part 2 - National Developments;
- Part 3 - National Planning Policy Handbook;
- Part 4 - Delivering Our Spatial Strategy;
- Part 5 - Annexes.

- 5.2 The Revised Draft NPF4 now consist of 3 parts

- Part 1 - A National Spatial Strategy for Scotland 2045;
- Part 2 - National Planning Policy;
- Part 3 - Annexes.

- 5.3 The Revised Draft NPF4 has now been laid (8th November 2022) in the Scottish Parliament for a period of parliamentary scrutiny. At the time of writing there had been two sessions of evidence given to the Local Government, Housing and Planning on the 22nd and 29th November 2022. The next stages are

- a) a debate by the Scottish Parliament and vote on with a view to be being 'approved' by Parliament (likely within the next few weeks); and.
- b) Scottish Ministers are to then 'adopt' and 'publish' NPF4 as soon as practically possible (likely to be January/February 2023).

6. Revised Draft NPF4

6.1 The Revised Draft NPF4 consists of 3 parts namely;

- Part 1 - sets out a National Spatial Strategy for Scotland to 2045. The Strategy is based around *sustainable places*, *liveable places*, and *productive places* and sets out spatial principles and Regional Spatial Priorities for Scotland.

In the context of the Glasgow City Region this is included as part of what is described as “*Central*” aimed at transforming and pioneering a new era of low carbon urban living.

The Strategy will also guide the preparation of Regional Spatial Strategies, Local Development Plans and Local Place Plans as well as being relevant to wider policies and strategies relating to land use.

It sets out the 18 National Developments which will support the Spatial Strategy.

- Part 2 - is the National Planning Policy consisting of 33 policies which set out the policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining planning consents. This part should be taken as a whole, and
- Part 3 - consists of 7 Annexes (A) How to use the NPF; (B) National Developments Statement of Need; (C) Spatial planning priorities; (D) Six qualities of successful places; (E) Minimum all-tenure housing land requirements; and (F) Glossary of definitions and (G) Acronyms.

Spatial Principles to 2045

6.2 The Revised Draft NPF4 sets out six overarching principles in relation to where development should be located remain the same, namely

- (1) **Just transition** - empower people to shape their places and ensure the transition to net zero is fair and inclusive.
- (2) **Conserving and recycling assets** - make productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy.
- (3) **Local living** - support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.
- (4) **Compact urban growth** - limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.
- (5) **Rebalanced development** - target development to create opportunities for communities and investment in areas of past decline and manage development sustainably in areas of high demand.

- (6) **Rural revitalisation** - encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.

6.3 These spatial principles have underpinned the development of previous strategic plans for the Glasgow city region.

Central - Spatial Priorities (previously the Central Urban Transformation Area)

6.4 This area broadly covers central Scotland from the Glasgow City Region and the Ayrshires in the west to Edinburgh City Region in the east, including the Tay Cities, the Forth Valley and Loch Lomond and the Trossachs National Park.

6.5 In terms of the priorities for the Central area in relation to the place agenda these are as follows

- to deliver sustainable place - Regional Spatial Strategies and Local Development Plans in this area should support net zero energy solutions including extended heat networks and improved energy efficiency, together with urban greening and improved low carbon transport;
- to deliver liveable places - Regional Spatial Strategies and Local Development Plans in this area should pioneer low carbon, resilient urban living by rolling out networks of 20 minute neighbourhoods, future proofing city and town centres, accelerating urban greening, investing in net zero homes, and managing development on the edge of settlements.;
- to deliver productive places - Regional Spatial Strategies and Local Development Plans in this area should target economic investment and build community wealth to overcome disadvantage and support a greener wellbeing economy.

6.6 The following National Developments will also support delivery of the spatial strategy for this area, namely:

- Pumped Hydro Storage (Scotland wide);
- Strategic Renewable Electricity Generation and Transmission Infrastructure (Scotland wide);
- Circular Economy Material Management Facilities (Scotland wide);
- Urban Sustainable, Blue and Green Drainage Solutions (Edinburgh and Glasgow) - '*Metropolitan Glasgow Strategic Drainage Partnership*';
- Urban Mass/Rapid Transit Networks (Aberdeen, Edinburgh and Glasgow) - '*Glasgow Metro*';
- Central Scotland Green Network (incorporating the Glasgow City Region Green Network);
- National Walking, Cycling and Wheeling Network (Scotland wide);
- Digital Fibre Network (Scotland wide);
- Clyde Mission; and,
- High Speed Rail.

- 6.7 In the context of the above the Indicative Regional Spatial Strategy submitted in June 2020 by Clydeplan to support the development of the Draft NPF4, the regional spatial themes (housing, vacant and derelict land and sustainable connectivity) and key elements of the Spatial Investment Framework (Clyde Mission, Green Network, MGSDP), have all been reflected in the Revised Draft NPF4.

Housing

- 6.8 As part of the development of the Revised Draft NPF4 all local authorities were asked to supply a 10 year Minimum All-Tenure Housing Land Requirement (MATHLR). For the City Region this process was undertaken by the Glasgow City Region Housing Market Partnership (HMP).
- 6.9 The figure for the City Region submitted by the HMP of 50,350 has not been amended in the Revised Draft NPF4.
- 6.10 It is still not clear if the Scottish Government's approach to housing takes account of the Scottish Government's Population Strategy (May 2021) which states that Scotland is precariously balanced, with depopulation threatening some of our areas particularly across the Islands and in the West, and rapid population growth in others, predominantly in the East.

Local Authority	10 year Minimum All-Tenure Housing Land Requirement
East Dunbartonshire	2500
East Renfrewshire	2800
Glasgow	21350
Inverclyde	1500
North Lanarkshire	7350
Renfrewshire	4900
South Lanarkshire	7850
West Dunbartonshire	2100
Glasgow City Region	50350

National Planning Policy

- 6.11 The Revised Draft NPF4 now contains 33 policies (previously 41) and split into 3 section 'Sustainable Places (previously Distinctive Places'; 'Liveable Places' and 'Productive Places' previously 4 sections.

6.12 The 33 subject based policies relate to:

Sustainable Places	Liveable Places	Productive Places
1. Tackling the climate and nature crises	14. Design, quality and place	25. Community wealth building
2. Climate mitigation and adaptation	15. Local living and 20 minute neighbourhoods	26. Business and industry
3. Biodiversity	16. Quality homes	27. City, town, local and commercial centres
4. Natural places	17. Rural homes	28. Retail
5. Soils	18. Infrastructure first	29. Rural development
6. Forestry, woodland and trees	19. Heat and cooling	30. Tourism
7. Historic assets and places	20. Blue and green infrastructure	31. Culture and creativity
8. Green belts	21. Play, recreation and sport	32. Aquaculture
9. Brownfield land, vacant and derelict land and empty buildings	22. Flood risk and water management	33. Minerals
10. Coastal development	23. Health and Safety	
11. Energy	24. Digital infrastructure	
12. Zero waste		
13. Sustainable transport		

6.3 The Clydeplan Topic Groups will be considering in detail the implications of the national planning policies and the opportunities for taking a consistent approach to their interpretation, implementation, monitoring and evaluation through the Local Development Plan and Development Management processes.

7. Regional Spatial Strategies

- 7.1 The Revised Draft NPF4 sets out the role of Regional Spatial Strategies as part of the '*plan led approach*' to planning namely;
- NPF - The NPF must have regard to any adopted regional spatial strategy.
 - RSS - The Planning (Scotland) Act 2019 introduced a new duty requiring the preparation of regional spatial strategies. A planning authority, or authorities acting jointly will prepare these long-term spatial strategies for the strategic development of an area. RSS are not part of the statutory development plan but have an important role to play in informing future versions of the NPF and LDPs.
 - LDP - Planning authorities must prepare an LDP which sets out a spatial strategy for the development of that area. It must take into account the National Planning Framework and any registered local place plan in the area it covers and it must have regard to the authority's adopted Regional Spatial Strategy.

8. Delivery Programme

- 8.1 The Revised Draft NPF4 sets out a Delivery Programme and in relation to RSSs states that the Planning (Scotland) Act 2019 introduced a new approach to strategic planning which aims to stimulate innovation by encouraging more flexible and collaborative ways of working.
- 8.2 The new arrangements for strategic planning are expected to support better alignment with other strategies and decisions at a regional and sub-national scale. These place RSSs in a strong position for supporting the implementation of NPF4.
- 8.3 Consistent with the new statutory purpose of planning, RSSs will enable planning authorities to work with others to guide future long-term strategic development and use of land in the long-term public interest. They can provide a place-based strategy that guides future development across an area.
- 8.4 Key aspects could include identification of networks of regionally significant centres, and ensuring the spatial strategy identifies and responds to nationally and regionally recognised natural and historic areas and assets.
- 8.5 Throughout Scotland, places are coming together to develop Regional Economic Strategies underpinning City Region and Regional Growth Deals, Regional Economic Partnerships, Regional Land Use Partnerships, and to provide regional input to STPR2. RSSs have a crucial role to play in expressing the spatial ambitions of this work.
- 8.6 Work on preparing RSSs will be expected to begin once statutory guidance is in place. At this point support will be available to planning authorities. It is expected that the pace of preparation will vary across Scotland, depending on local and regional priorities. Work to prepare new LDPs will not be contingent on RSSs being either under preparation or in place.

9. Regional Spatial Strategy Guidance

- 9.1 The Scottish Government has set out the following timetable in respect of the preparation of RSS guidance. Clydeplan continues to offer its support to the Scottish Government in the development of the RSS guidance.

Theme	Support measure	Scottish Government (SG) role	Delivery partner(s)	Scottish Government (SG) next steps	Short term action 2023	Medium term action 2024 - 2028
Delivery mechanisms (regulations and guidance)	Regional Spatial Strategy (RSS)	SG responsible for guidance	Stakeholder engagement including collaboration with HOPS and regional partners	Progress drafting	✓	✓

10. Observations

- 10.1 The publication of the Revised Draft NPF4 is welcome as part of the implementation of the new Development Plan system though a clear timetable for the approval and publication of the NPF4 and related guidance and transitional arrangements would have been helpful.
- 10.2 It is also disappointing that the Minister has stated that there is no opportunity at this time to modify or amend the Revised Draft prior to its consideration by the Scottish Parliament.
- 10.3 The readability of the document particularly in terms of the relationship between the various elements of the document is much better in particular Table 1 and the cross-cutting outcomes and policy links sections. Additionally, definitions have been included in the Glossary of Definitions which are also helpful.
- 10.4 Despite the comments on Draft NPF4 from Clydeplan in this regard, the Revised Draft still has no Vision statement nor is there a clear demographic framework in support of the Scottish Government's Population Strategy. The issue hinted at within the Population Strategy of east/west population imbalance does not appear to have been specifically addressed.

- 10.5 With the introduction of more emphatic language including use of the word “will” within policies and the spatial principles the context for delivering the compact city model is greatly enhanced. This combined with Policy 8, *Green Belts*; Policy 9, *Brownfield, vacant and derelict land and empty buildings*; and the Policy 14 on *Design, quality and place*; Policy 15 *Local living and 20 minute neighbourhoods* and Policy 16 *Quality homes* provides a potentially stronger context for resisting development on greenfield sites and promoting the reuse of previously used land and buildings.
- 10.6 The Central component of the National Spatial Strategy is intrinsically the same as that included in the Draft NPF4 though the document would have benefitted from the greater recognition of sub regional geographies and related issues and challenges within the Central Area and its related narrative.
- 10.7 There appears to be little recognition of cross boundary and cumulative impact issues and no reference of the important role for RSSs in potentially addressing such issues.
- 10.8 From an RSS perspective the timetable for the preparation of RSS guidance and the Scottish Government’s statement that “work on preparing RSSs will be expected to begin once statutory guidance is in place” seems to indicate that this may still be some time off which is disappointing in terms of the taking the new Development Plan system forward as matter of priority.

11. Clydeplan Core Team

- 11.1 The Clydeplan Core Team is the Joint Committee’s staffing resource which, on behalf of the eight local authorities will lead the development of the Regional Spatial Strategy.
- 11.2 The Core Team staffing structure comprises the following posts, namely
- Manager;
 - Assistant Manager;
 - 3 Strategic Planners (currently one vacancy);
 - Planning Analyst;
 - Administration Officer; and,
 - Administration Assistant (part time).
- 11.3 The Clydeplan Manager also has line management responsibility for the Green Network Development Officer, Green Network Communications Officer (part time) and the Green Network Grassland and Wetland Development Lead (two year post).
- 11.4 The Clydeplan Manager and Assistant Manager have indicated that it is their intention to retire in April 2023 and December 2022 respectively.
- 11.5 As well as the new duty to prepare a RSS, the Planning (Scotland) Act 2019 sets out a number of other additional duties on local authorities particularly in relation to Local Development Plans which the Clydeplan Core Team could provide a useful resource to support its local authorities.

- 11.6 This could include opportunities for taking a consistent approach to their interpretation, implementation, monitoring and evaluation to the new national planning policies in NPF4 in addition to providing a regional land use evidence context alongside technical support in the form of data collection and GIS mapping.
- 11.7 In addition, the regional agenda through the auspices of Glasgow City Region, particularly in relation to economic development, is also developing and again the Clydeplan Core Team has a role to play in terms of setting out the spatial expression of the Regional Spatial Strategy and supporting the various city region thematic portfolios.
- 11.8 In light of the above, it is proposed that a review of the Clydeplan Core Team staffing structure is undertaken, led by the Chair of the Clydeplan Steering Group, to consider how the organisation can best support the new planning legislative and regional joint working agenda and that a further report is brought back to the Joint Committee at a future date.