Glasgow and the Clyde Valley Strategic Development Planning Authority

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

On: **14th March 2022**

Report by

Stuart Tait, Manager

National Planning Framework 4

1. Introduction

1.1 This report is for the Joint Committee to consider its response to the consultation, by the Scottish Government, on the Draft National Planning Framework 4 (NPF4).

2. Recommendation

2.1 It is recommended that the Joint Committee consider and approve the response to the Scottish Government's consultation on NPF4.

3. Planning (Scotland) Act 2019 - NPF4 and Regional Spatial Strategies

3.1 Under the terms of the Planning (Scotland) Act 2019 the requirement for Strategic Development Plans in the four largest city regions has been removed and in its place there will be a requirement for all authorities, working together as they see fit, to prepare Regional Spatial Strategies setting out strategic development priorities.

3.2 This part of the Act has not yet come into force however it is anticipated this will happen once NPF4 is approved by the Scottish Parliament in the summer of 2022. Following this the Scottish Government have stated they will publish guidance on Regional Spatial Strategies in late 2022.

3.3 NPF4 once approved by the Scottish Parliament will form part of the statutory Development Plan with the current Clydeplan Strategic Development Plan (July 2017) will no longer being part of the Development Plan.

4. Consultation

4.1 The Draft NPF4 consultation closes on 31st March 2022.

4.2 The Glasgow City Region's Regional Partnership will consider the endorsement of the Joint Committee's response at its meeting to be held on 17th March 2022.

5. Draft NPF4

5.1 The Draft NPF4 consists of 5 parts, namely

> ➤ Part 1 - sets out a National Spatial Strategy for Scotland to 2045 including in the context of the Glasgow City Region this is included as part of what is described as *'Central urban transformation'* aimed at transforming and pioneering a new era of low carbon urban living;

> ➤ Part 2 - sets out the 18 National Developments which will support the Spatial Strategy;

> ➤ Part 3 - is the National Planning Policy Handbook consisting of 35 policies which set out the policies for the development and use of land; and,

> ➤ Part 4 - sets out an outline of how the Scottish Government will deliver the Spatial Strategy.

> ➤ Part 5 - Annexes **-** A - NPF4 outcomes statement, B - Housing numbers C - Glossary of definitions.

6. General Observations

6.1 The publication of the Draft NPF4 by the Scottish Government is welcomed as the first stage in setting out the new statutory Development Plan system for Scotland.

6.2 With the demise of the Strategic Development Plan, it is considered important that the regional context for the Glasgow City Region, as Scotland's only metropolitan city region, in terms of its opportunities and challenges is appropriately reflected in NPF4.

6.3 The NPF has a very strong environmental and placemaking focus principally around net zero and addressing the climate and biodiversity emergencies, however there is a significantly less of a focus on the economy than in previous National Planning Frameworks.

6.4 As part of the NPF's National Spatial Strategy the Glasgow City Region is included in what the NPF4 describes as *the 'Central Urban Transformation Action Area'*, an extensive geographical area also covering the regions of Ayrshire, Tayside, Edinburgh and the Lothians and Loch Lomond and the Trossachs National Park.

6.5 The key spatial components of this Action Area generally align with the previously submitted *'Indicative Regional Spatial Strategy'* for the Glasgow City Region including reference to the Clyde Mission, Central Scotland Green Network along with the Clyde Climate Forest, Metropolitan Glasgow Strategic Drainage Plan and High Speed Rail all of which are identified as National Developments.

6.6 There is however less alignment with the Glasgow Economic Strategy (December 2021) and as such an opportunity exists to ensure the 'Grand Challenges' and 'Transformational Opportunities' particularly around place theme are reflected in the final NPF.

6.7 Given the range and diversity of issues to be addressed within this very large geographical area greater recognition in the NPF of the sub regional geographies - reflecting the IRSS boundaries - would be more appropriate and set a better spatial context for the future Regional Spatial Strategies and Local Development Plans.

6.8 With regard to the above observations it is considered the document could be improved with the inclusion of

> - a Planning Vision (NPF3 included a Vision);
> - a Demographic Framework including reference to Scottish Government's Populations Strategy;
> - an Economic Framework setting out how Scotland's economy operates spatially including the role of the Glasgow City Region and how it will support the Scottish Government's National Strategy for Economic Transformation (March 2022);
> - greater alignment with the Glasgow City Region's Regional Economic Strategy;
> - recognition of sub regional geographies within the Central Urban Transformation Action Area;
> - connectivity as a theme particularly in relation to Liveable Places;
> - greater recognition of cross boundary and cumulative impact issues and need to reference the role for Regional Spatial Strategies in potentially addressing such issues;
> - use of less subjective language particularly in policy wording; and,
> - expanded Glossary of definitions.

6.9 The proposed response is set out in the Appendix and is submitted with the intention to improve and enhance the NPF.

APPENDIX

Part 1 - A National Spatial Strategy for Scotland 2045		
Subject	**Observations**	**Suggested amendments**
Planning Vision	The NPF should set out a clear vision for the development of Scotland to 2045 in line with the principles set out in Planning Circular 6/2013 which states vision statements should provide a realistic expression of what the plan area could be like in 20 years" time and a useful springboard for the spatial strategy of the plan. This Vision statement should be a broad statement of how the development of the area could and should occur and the matters that might be expected to affect that development, including: ➢ the principal physical, economic, social and environmental characteristics of the area; ➢ the principal land uses in the area; ➢ the size, composition and distribution of population in the area; ➢ the infrastructure of the area (including communications, transport and drainage systems and systems for the supply of water and energy); how that infrastructure is used; and. ➢ any anticipated change in these matters.	A Planning Vision for NPF4 should be included that reflects the comments identified in the previous column

Demographic Framework	NPF4 should set out a demographic framework for Scotland including the identification of areas for future population growth. This framework should address the opportunities and challenges as set out the Scottish Government's Population Strategy (March 2021) particularly in relation to population balance and its sustainable distribution across Scotland along with consideration of the potential economic and social impacts of the global climate emergency	A Demographic Framework for NPF4 should be produced that reflects the elements identified in the previous column
Economic Framework	NPF4 should set out an economic framework for Scotland aligned to its National Strategy for Economic Transformation (March 2022) and set the land use actions required to support the delivery of sustainable economic growth through increasing competitiveness and tackling inequality. This framework should recognise the economic contribution of the Glasgow City Region as Scotland largest city region which accounts for roughly one third of the Scottish economy as its engine of growth and one that has evolved to a knowledge-based service economy.	An Economic Framework for NPF4 should be included that reflects the elements identified in the previous column
Spatial Principles for Scotland to 2045	These are identified in the National Spatial Strategy and throughout each of the Action Areas (including the Central Urban Transformation Action Area), however they are not mentioned again later in the document. It would be helpful if these principles could be continued to Part 3. The principles should also underpin a Vision for the NPF	Reference the Spatial Principles within Part 3 the National Planning Policy Handbook

	The status of the Spatial Principles is unclear	Clarification required
General	Part 1 introduction (page 3) more balance in terms of the text between the economy and the environment is required recognising the Scottish Government's central purpose and economic objectives of boosting competitiveness and reducing inequality	Reference should be made the economic objectives of the NPF4. Refer also comments above Framework.
	"How to use this document" - this section should include an infographic setting out the Development Plan system for Scotland including the Regional Spatial Strategy	Include Development Plan system infographic

Central Urban Transformation Action Area		
Subject	**Observations**	**Suggested amendments**
Regional Geographies	This Action Area covers a significant part of Scotland, particularly in terms of population, and with it a variety and diversity of strengths, challenges and opportunities. To more appropriately reflect these aspects the Action Area narrative should reflect the individual indicative Regional Spatial Strategy geographies identifying the key strengths, challenges and opportunities of each area and how they can support the delivery of the overall Action Areas aims. This approach would also provide for greater alignment between the NPF4 and future Regional Spatial Strategies.	Reflect the individual indicative Regional Spatial Strategy geographies in the Action Areas narrative

Economic Sectors	An Economic Framework is required for NPF4 which should set out the key economic sectors within the Central Urban Transformation Action Area along with the key economic drivers and issues to be addressed.	See GCR Regional Economic Strategy row below for fuller details
	The rural component of the Glasgow City Region is missing especially as it includes important sectors such as renewable energy and mineral extraction.	
Glasgow City Region Regional Economic Strategy	The NPF should reflect the three Grand Challenges as set out in the GCR Regional Economic Strategy (RES) (December 2021) namely creating an inclusive economy, enhancing productivity, and addressing the climate emergency.	Central Urban Transformation Action Area narrative should make specific reference to the three Grand Challenges as set out in the GCR RES (page 6)
	In the context of the Glasgow City Region within the Central Urban Transformation Action Area NPF4 should make particular reference to the need to ➣ tackle deprivation; ➣ reimagine places; ➣ address the levels of vacant and derelict land; ➣ develop metropolitan infrastructure including green infrastructure; ➣ deliver high quality places and spaces; and. ➣ deliver affordable housing.	Also it should also reflect the 'Seven Transformational Opportunities' (page 6) and in particular those based round 'Place' (page 21) of the GCR Economic Strategy https://glasgowcityregion.co.uk/wp-content/uploads/2021/12/GCR-EconomicStrategy-Final.pdf

Action 20 - Reimagine development on the urban fringe	This action underplays the wider green belt and its ability to guide development into the urban area	This section should be re-edited for consistency in terminology with the relevant policies and Glossary updated accordingly
	There is no mention of green belt and, historically, in the Glasgow City Region a strong greenbelt has been a key policy tool to deliver a compact urban city region.	Reference should be made to the role of the green belt in a city region context
Town Centres	Glasgow City Regions larger towns - this element needs to be strengthened in the text given their scale, at a national level, and locations where multiple policy benefits can be delivered for example, recognition of centres such as East Kilbride, Cumbernauld and Paisley	This section should be reworked so that it reflects the observations set in the previous column
Spatial structural trends to 2045	There is a lack of content around spatial structural trends given the 2045 timeframe. For example, the growth in demand for warehouses due to increases in online shopping - the central belt will clearly be a preferred location for many developers/operators in logistics and the spatial requirements of these kind of operations. These types of trends are not identified in the document as a whole nor reflected in the National Planning Policy Handbook	This section should be reworked so that it reflects the observations set in the previous column
Glasgow Airport	The areas airports, and in particular Glasgow Airport, should be recognised in NPF4 in the context of their	This section should be reworked so that it reflects the observations set in the previous column

	- economic role in support of their hub and gateway functions both nationally and regionally; - national and international connectivity role in terms of support for business and tourism; - need for strategic enhancements in support of the above within the statutory climate changes targets	
Central Scotland Green Network (CSGN)	The CSGN currently sits under Liveable Places and is mentioned again, along with the Glasgow and Clyde Valley Green Network, in Action 15. Accelerate Urban Greening. While the Green Network will deliver on the ambitions of these sections the Green Network will have a key role in addressing the nature crisis, nature restoration and nature networks and therefore will have much wider and cross-cutting benefits than currently framed.	Action 15 - "*Glasgow City Region Green Network*" should read *"Glasgow and Clyde Valley Green Network"* Further cross referencing of the role and benefits of the CSGN and Green Networks in general is required through the document
Action 15 - Urban Greening	Whilst the focus of this section is intended to be urban recognition requires to be given to the significant rural area within this geography and the specific land use considerations this brings to secure: - effective delivery of strategic networks and cross boundary initiatives such as Glasgow and Clyde Valley Green Network, and its associated 'Blueprint'; and, - support the fundamental links between the urban and rural areas in terms	This section should be reworked so that it reflects the observations set in the previous column

	addressing the climate emergency and ecological crisis	

Part 2 - National Developments

Subject	Observations	Suggested amendments
Central Scotland Green Network (CSGN) Digital Fibre Network Circular Economy Materials Management Facilities National Walking and Cycling Network Urban Mass/Rapid Transit systems - 'Glasgow Metro' Urban Sustainable Green/Blue Networks - MGSDP High Speed Rail Clyde Mission	The National Developments as set out in NPF4 as they relate to the Glasgow City Region are welcomed All of the National Developments identified should be supported by inclusion within an appropriate delivery mechanism such as the Programme for Government, Infrastructure Investment Plan and STPR2	
	CSGN - reflecting the CSGN comment above the text in this section highlights the role of Green Networks in peatland restoration and nature networks which are largely rural in nature. The CSGN however also as much of role to play in delivering the policies under Distinctive Places (29,31,32,33,34), and Universal Policy 3: Nature Crisis, as Liveable Places policies where it currently sits	Additional references in text of the role of the CSGN
	National Walking and Cycling Network - . the text should highlight that this includes both on and off road and links to the Green Network routes that cater to a variety of users preferences and utilises existing Green Infrastructure.	This section should be re-edited so that it reflects the comment identified in the previous column. This National Development should be titled 'Scotland wide' as National may be confused with Sustrans 'National Cycle Network'.

	Urban Sustainable Green/Blue Networks - subjective wording "minimised" "optimised"	Clarification required

Part 3 - National Planning Policy Handbook		**Suggested amendments**
General	The six Universal Policies should be repackaged as the 'Objectives' rather than as policies as they underpin the whole of the NPF	Rename Universal Policies as 'Objectives'
	There requires to a 'clear read across' all parts of NPF4. The usability of the document could be augmented by using the summary sections for Sustainable, Liveable, Productive and Distinctive Places as an opportunity to highlight the relevant policy content from Part 3 of the document	Cross reference the policies in Part 3 with Part 1
	Policy numbers should be referenced in the contents page	Policy numbers should be included in the contents page
Sustainable places (Universal Policies)		
General	Reference should be made to Section 25 of the Town and Country Planning Act 1997 in terms of the status of the development plan	This section should be re-edited so that it reflects the comment identified in the previous column. Remove all bold from policy text
Policy1 - Plan-led approach to sustainable development	No observations	

Policy 2 - Climate emergency	Policy 2 Climate Emergency and Policy 3 Nature Crisis, should not be considered in isolation. The wording should be revisited to ensure that these are policies rather than statements of intent	This section should be re-edited so that it reflects the comments identified in the previous column
	Subjective wording - "significant"	Clarification required
Policy 3 - Nature crises	Policies 3 a), b) and c) read like ambitions rather than policies	Reword Policies 3a), b) and c) to read as policies
	Policy 3 d) states "the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention".	Clarification required on how this is to be measured
	Subjective wording - "facilitate"; "strengthening"; "contribute"; "minimised" "maximising"; "significant"; "wherever appropriate"	Clarification required

	Nature recovery networks are a strategic and cross-boundary consideration	Add bullet point to policy - ''Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'
Policy 4 - Human Rights and Equality	4a) "Planning should…."- who/what is meant by planning?	4a) insert 'The planning system'
Policy 5 - Community wealth building	Community wealth building objectives required to be set out	Set out the objective of community wealth building
Policy 6 - Design, quality and place	Subjective wording "high quality"; "poorly"; "detrimental"	Clarification required
Liveable places		
Liveable places	An important element of liveable places is the need for them to be connected at a variety of scales - local, regional, national and international scale	The name of this section should be renamed 'Liveable and Connected Places'
Policy 7 - Local living	Cross boundary considerations missing for example in the context of 20 minute neighbourhoods and also strategic scale commercial/leisure proposals	Add bullet point to policy - *"Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'*
	The preamble states "*people can meet the majority of their daily needs within a reasonable walk, wheel or cycle (within approx. 800m) of their home"*, however the National Indicator - Access to Green and Blue Space, is based on a 5 minute walk or	Clarification and consistency required with respect to the distance thresholds

	approx. 400m. These two distance thresholds seem at odds with each other	
	Policy 7 part b), weak wording "*consideration should be given to*"	Policy 7 part b) bullet 6 "local playgrounds…." Add text "in line with the requirements of the Open Space Strategy and Play Sufficiency Assessment" Part b) should include reference to the Green Network as contributing to the infrastructure so that destinations "*can be accessed easily by walking, cycling and wheeling*"
	The work element in this links to live/work units and hubs. Such items should be listed in the bullets under (b) and misses the opportunity to thread this concept into other related policy	List *'Live/work'* under (b)
Policy 8 - Infrastructure First	What constitutes 'infrastructure' under the terms of this policy requires to be set out	Insert the following definition into the policy: "development" has the meaning given by section 26 of the Town and Country Planning (Scotland) Act 1997 "infrastructure" includes - (i) communications, transport, drainage, sewerage and flood-defence systems; (ii) systems for the supply of water and energy; (iia) green and blue infrastructure; (iii) educational and medical facilities; and

		(iv) facilities and other places for recreation, "green and blue infrastructure" means features of the natural and built environments (including water) that provide a range of ecosystem and social benefits, "infrastructure project" means a project to provide, maintain, improve or replace infrastructure
	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Add bullet point to policy - *"Given the potential cross boundary nature of infrastructure proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'*
Policy 9 - Quality Homes	No mention of addressing housing need and demand at functional Housing Market Area geography	Reference to functional Housing Market Areas required
	The introduction of the concept of deliverable land and development pipelines which are to include short, medium and longer term sites requires explanation	Guidance required on how this is to interpreted to ensure consistent application
	Subjective wording - "high quality"; "great places"	Clarification required

| Policy 10 - Sustainable Transport | No direct or specific mention of the role freight and the sustainable transportation of goods and raw materials.

This is also a cross boundary issue. | Insert the following into the policy – *'To support the NPF4 Spatial Development Strategy, Local Authorities should:*

• *safeguard and promote investment in the Freight Transport Hubs to support the agreed freight mode and, where appropriate, associated passenger facilities;*

• *ensure that ancillary land allocations adjacent to freight facilities where appropriate, are safeguarded solely for the purposes of freight activity; for example, storage, trans-shipment, break-bulk infrastructure and related services*

• *Given the potential cross boundary nature of these proposals. Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'* |
| | High Speed Rail (HSR) - HSR is identified in Part 1 - Central Urban Transformation and is a National Developments however there HSR, including the need to secure and safeguard related development land, options for sustainable transport connections between the terminus and the rest of the city region/Scotland and the route and development options located within Local Authorities through whose | A specific HSR policy should be added:

For HSR purposes all relevant Local Authorities and stakeholders should where applicable, safeguard and secure:

• related development land,

• options for sustainable transport connections between the terminus and the rest of the surrounding area and |

	administrative areas the HSR may pass en route to a central Glasgow terminus	• the route and development options located within Local Authorities through whose administrative areas the HSR may pass en route to a central terminus'
	Clearly this is a cross boundary issue and this needs to be acknowledged in the policy	Add bullet point to policy - ''Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'
	Subjective wording - "appropriate and effective" "reasonable alternative"	Clarification required
Policy 11 - Heating and Cooling	No reference to domestic retrofit to existing homes	Reference to domestic retrofit to existing homes should be added
Policy 12 - Blue and green infrastructure, play and sport	These should be separate policies	Consideration to developing separate policies for both blue and green infrastructure and play and sport
	The various components addressed in this policy are constituent parts of the Green Network. The text states that Green Infrastructure provides more benefits and should be considered as part of a Green Network	Definition of Green Infrastructure required of the relationship between green networks, greenspace and GI and a statement that Green Infrastructure delivers more benefits when it part of a network. Consideration of a separate Green Network policy
	No read across of reference to the requirement for Open Space Strategies or Play Sufficiency Assessments	Cross reference to Open Space Strategies or Play Sufficiency Assessments required

	Policy 12 a) consideration of Green Infrastructure as part of a wider network is a cross boundary issue and should be supported through the Regional Spatial Strategy	Add bullet point to policy - "Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'
	Policy 12 h) subjective wording "wherever possible" Policy 12 i) "infrastructure should be addressed" and "wherever this is necessary"	Clarification required
Policy 13 - Sustainable flood risk and water management	The policy does not include a strategic context to allow full consideration catchment areas, RBMP, FRMP, SFRA (and flood Mapping) and strategic approaches such as Metropolitan Glasgow Strategic Drainage Plan and the Glasgow and Clyde Valley Green Network Blueprint. Reference should be made to water quality, sea level rise and adaptation should also be considered fully in the policy.	Policy rewording *"To support the NPF4 Spatial Development Strategy and to achieve an improved Water Quality Environment and Manage Flood Risk and Drainage, Local Authorities and Stakeholders should work together to support the requirements of the Local Flood Risk Management and River Basin Management Plans for their area. In addition, they should protect and enhance the water environment by:* • *adopting a precautionary approach to the reduction of flood risk;* • *supporting the delivery of relevant co-ordinated approaches/catchment based drainage management and green infrastructure plans applicable to their area; and,*

		- *safeguard the storage capacity of the functional floodplain and higher lying areas for attenuation'*
	SEPA recently issued a position statement on new building in flood risk areas. The Policy should reflect this. https://www.sepa.org.uk/media/534740/sepa-flood-risk-standing-advice-for-planning-authorities-and-developers.pdf	Policy should reflect SEPA's flood risk advice
	Policy 13 h) include read across to Policy 12 recognising that naturalised and accessible design is critical to delivering environmental and social benefit, and such natural flood risk management features should be incorporated into open space design od development proposals	Policy 13 h) cross reference to Policy 12 required
Policy 14 - Lifelong health, wellbeing	This policy would better fit as an Aim or Policy Principle as per the comment regarding the 'universal policies'	Refer to comment regarding the 'universal policies'
Policy 15 - Safety	Title of policy a little misleading given it follows health and wellbeing.	Rename policy to 'notification zones' or Hazardous sites and substances
Productive places		
Policy 16 - Land and premises for business and employment	The word 'premises' seems anomalous in terms of the policy title	Remove '*and premises*' from policy title

	No specific mention of a hierarchy, in particular numerical scales of development that are acceptable in employment locations, including specific Use Classes references etc. With the removal of a hierarchy of sites, scales and Use Classes then it's more difficult to identify locations in any type of network thus making it difficult to assess proposals	Policy should specifically mention the need to identify a hierarchy of sites, acceptable range of Use Classes in these locations and also it should be tied to the Nationally agreed scales of development - https://www.gov.scot/publications/scottish-planning-series-circular-5-2009-hierarchy-developments/
	Any City Centre elements in Parts 1 and 2 are not reflected in the subsequent policy section. There needs to be a clearer distinction for city centres and this should be reflected in the subsequent policy framework	The policy should have separate bullet point which states that, 'In support of the NPF4 Spatial Development Strategy, Local Authorities should recognise the strategic importance of a City Centre to their area and wider regional economy, where applicable. This will require the consideration of the impact of development proposals both individually and cumulatively on a City Centre.'
	No cross boundary elements identified in the policy - no mention of impact of development on the LDP defined economic locations on any other employment location, including the city centre as defined by Part 1 of NPF4	Add bullet point to policy - "Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate"
Policy 17 - Sustainable tourism	The term 'resilience' seems an anomalous term in the context of supporting the tourism sector	(a) delete 'support the resilience of' and replace with 'protect and enhance'

	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Add bullet point to policy - ''*Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate*''
Policy 18 - Culture and creativity	It is not clear the process by which an LDP can recognises and support opportunities for jobs and investment in the creative sector, culture, heritage and the arts	Clarification required with respect to 'support' and 'recognise' in the context of this policy
Policy 19 - Green energy	The policy does not fully consider cross boundary issues or provide for proper consideration of all types and scale of renewable development and potential for spatial frameworks for energy types and an area's full potential for electricity and heat from renewable sources including consideration of cumulative impacts	Add to Policy 19 - *'Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'* Consideration of the role of RSS's in terms of the development of spatial frameworks for various energy types
	The policy needs to address tensions being created to ensure that it does not sit counter to the overall aims of the NPF. Further tensions exist in considering the suitability of agricultural land for energy development such as solar	Consideration of tensions with the ambitions of other policies e.g. Policy 33 Peat and carbon rich soils
	.Definition of which impacts are considered to be 'unacceptable'. Minimal consideration of smaller scale schemes and a full range of energy sources beyond solar and wind - hydrogen etc.	Clarification required

	Policy 19 g) wind energy - areas identified as suitable for use in perpetuity	Clarification required is perpetuity legally enforceable
	No mention of decentralising this should be specifically mentioned within the policy itself	Decentralisation should be referenced in the Policy
	What does 'full potential' mean? In order to meet this there will be locations where cross boundary considerations will arise and require to be addressed.	Clarification required
Policy 20 - Zero waste	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Add to Policy 20 - *'Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'*
	Policy 20 f) No potential to refuse this type of use in industrial areas, in particularly strategic locations. Waste is sometimes not an acceptable use in a strategic economic location and this needs to be highlighted. It is unlikely that 'major' waste infrastructure developments could be accommodated in traditional urban industrial locations due to scale and proximity to neighbouring uses	Policy 20 f) Add additional element to policy with regards assessing proposal criteria – refer criteria outlined for assessing these types of proposals in South Lanarkshire Council LDP2 – Policy 17 Waste - as a worked example - <u>LDP2 Volume 1 document Planning and building standards - South Lanarkshire Council</u> (pages 42-43)
Policy 21 - Aquaculture	No observations	
Policy 22 - Minerals	Cross boundary considerations are not referred to in relation to this policy	Add to Policy - 'Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'

Policy 23 - Digital infrastructure	Subjective wording - "appropriate" "universal "futureproofed"	Clarification required
Distinctive places		
Policy 24 - Centres	Policy wording - 24(a) "sustainable futures….."	Remove 'support sustainable futures for' and replace with, 'protect and enhance'
	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Add bullet point to policy - *"Given the potential cross boundary nature of these proposals, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'*
	Policy 24 (a) There is no distinction between 'City Centre' and 'Town Centre' in the policy wording and therefore the policy itself makes no distinction of hierarchy when identifying a network.	Policy 24(a) add after reflects, 'the relationships between,'
Policy 25 - Retail	Policy 25 (b) How are 'acceptable impacts' to be quantified, assessed and on what centres? Is it just those identified in the LDP network or in neighbouring Authorities given the cross boundary nature of these types of proposals?	Policy 25 b) 'acceptable impacts' should be tied to the nationally agreed scales of development - https://www.gov.scot/publications/scottish-planning-series-circular-5-2009-hierarchy-developments/ Policy 25 b) delete, 'area' and insert 'network of centres and other neighbouring Local Authorities centres, including a City Centre, where applicable'

Policy 26 - Town Centre First Assessment	Clearly this is a cross boundary issue, for example, strategic scale commercial/leisure proposals and this needs to be acknowledged in the policy. This is not just an issue for larger centres but has implications for local centres and 20 minute neighbourhoods. Whilst b) does provide some elements of defining 'impact', it does not explicitly state how this is to be undertaken in relation to other Local Authority centres	Add to Policy 26 b) - ''*Given the potential cross boundary nature of these proposals. The potential economic impact and any related displacement effects should be taken into consideration with regards any other neighbouring Local Authority centres, including a city centre, where applicable'*
	Policy 26 c) weak wording "consideration should be given to"	Policy 26 c) should read for community, education, health and social care and sport and leisure facilities including provision for walking, wheeling and cycling, so that they are easily accessible to the communities that they are intended to serve
	Subjective wording - "flexibly and realistically"	Clarification required
Policy 27 - Town Centre Living	No observations	
Policy 28 - Historic assets and places	Subjective wording - 'as far as possible', 'adequately demonstrated' and 'reasonable effort' 'satisfactorily demonstrated'	Clarification required
	No mention of Tree Preservation Orders (TPOs) and trees within Conservation Areas.	Reference to TPOs should be included
Policy 29 - Urban edges	Policy should read 'Urban edges and Green Belt' to align with section title	Policy title should read 'Urban edges and Green Belt'

		The narrative for this policy should set out the objectives of the Green Belt namely	Add Green Belt objectives to text
		• directing planned growth to the most appropriate locations;	
		• supporting regeneration;	
		• creating and safeguarding identity through place-setting and protecting the separation between communities;	
		• protecting and enhancing the quality, character, landscape setting and identity of settlements;	
		• protecting open space and sustainable access and opportunities for countryside recreation;	
		• maintaining the natural role of the environment, whether in terms of floodplain capacity, carbon sequestration or biodiversity;	
		• supporting the farming economy;/ and meeting requirements for the sustainable location of rural industries including biomass, renewable energy, mineral extraction and timber production.	
		Policy 29 b) first bullet should be split with separate bullet points for woodlands and for accommodation as they cover different types of development proposals	Separate bullet points for woodlands and for accommodation

Policy 30 - Vacant and derelict land	Policy 30 a) should reference that a green end use is a legitimate consideration if the site is in a key location to address, for example, a greenspace deficiency identified through the Open Space Strategy or a gap in nature networks	Reference in to policy to green end uses
	Subjective language "creatively and sustainably repurpose"	Clarification required
Policy 31 - Rural places	Policy 31 d) sixth bullet, opportunity to promote and encourage live/work units that would contribute to rural hubs as a cluster	Policy should make reference to live/work
	Policy 31 e) third bullet subdivision should only be supported where it can be appropriately situated, and does not result in impacts on neighbouring properties in terms of amenity, sufficient garden ground, access and parking.	Policy should make reference to amenity considerations
Policy 32 - Natural places	Policy 32 h) the precautionary principle should be applied to all natural heritage assets, not just nationally or internationally significant.	Apply regionally and locally significant to the precautionary principle
	Policy 32 b) "*unacceptable impact*"	Clarification required on what constitutes "unacceptable impact"
	This a strategic and cross-boundary issue that should be supported by the RSS.	Add to Policy - 'Given the potential cross boundary nature of considerations relating to tree, woodland and forestry, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'

Policy 33 - Soils	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Add to Policy - 'Given the potential cross boundary nature of considerations relating to tree, woodland and forestry, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'
	Support the requirement to identify and protects valued soils (and Policy 34 Trees, Woodland and Forestry) but other habitats types such as wetland and grassland are equally as important but not given the same degree of consideration	Other habitats for example wetland and grasslands should be considered for policy support
	Title should read *"Peat and carbon rich soils"*	To reflect name of policy section
Policy 34 - Trees, woodland and forestry	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Add to Policy - 'Given the potential cross boundary nature of considerations relating to tree, woodland and forestry, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'
	Policy 34 c) There needs to be clarification about the meaning of 'additional public benefit' in relation to woodland removal. Peatland enhancement and the importance of single trees in an urban setting should also be considered.	Clarification required

	The support for multi-benefit forestry is welcomed, however, the policy should give consideration to the social benefits of forestry for rural communities (rather than focusing solely on carbon sequestration).	Reference to the social benefits of forest should be included
Policy 35 - Coasts	This policy can have cross boundary implications and this needs to be acknowledged in the policy	Policy 35 - Given the potential cross boundary nature of coastal development proposals and coastal systems, Local Authorities should work with adjoining Local Authorities on these matters, where appropriate'
	Policy 35 d) Regional Marine Plans are only referred to within the context of coastal defence measures. They have a wider role in supporting sustainable development, assisting in coastal adaptation to climate change and supporting the consideration of cross boundary issues	Wider role of Regional Marine Plans should be acknowledged
	Policy 35 e) Clarification on what are considered appropriate issues regarding long term coastal vulnerability and resilience.	Clarification required on what constitutes "appropriate uses '" under the terms of this policy

Part 4 - Delivering Our Spatial Strategy		Suggested amendments
Regional Spatial Strategy		
General - Regional Spatial Strategy (RSS) Guidance	The Scottish Government have indicated that draft statutory RSS guidance is to be published late in 2022. To allow regional groupings to progress the development of RSS's as soon as practically possible the timeline should be brought forward to more closely align with the approval of NPF4, which is anticipated for the summer of 2022. It is important that any guidance sets out a clear, functional and operational role for RSS's Clydeplan would welcome the opportunity to work with the Scottish Government on the development of this guidance	Reference to RSS's should allow for the consideration of cross boundary and/or cumulative impact issues where appropriate
Policy	It is unclear if the Regional Spatial Strategy should contain policies and if so what weight these policies would have in the decision making process as the RSS no longer part of the statutory Development Plan.	Clarification in guidance required
Housing Land Requirements	The setting of housing land requirements, formerly through the auspices of the Strategic Development Plan, is now the role of the National Planning Framework. The National Planning Framework sets this requirement for local authority areas	Clarification in guidance required

	only and not for the functional housing market areas that exist within city regions.	
	In this context the role of the RSS, if it is to have one, should be set out in guidance.	
Page 113	*"New Regional Spatial Strategies can identify areas for future population growth"* - this should be one of the principle roles for the National Planning Framework particularly at the local authority level and should reflect the Scottish Government's Population Strategy (March 2021).	Clarification in guidance required
Page 113	"*We expect them (Regional Spatial Strategies) to set out a clear place-based spatial strategy that guides future development across different areas of Scotland. This will include identification of networks of regionally significant centres, growth and investment areas and ensuring that future development and infrastructure works with each area's assets and whilst conserving and enhancing nationally and regionally recognised natural and historic areas and assets. The expectation of matters to be covered by the RSS should be set out in guidance.*"	Clarification of matters to be covered by a Regional Spatial Strategy in guidance required

Part 5

Glossary of definitions - New definitions required

• 20 Minute Neighbourhood • Balanced development • Biodiversity gain • Community Wealth Building (including link to legislation/guidance) • Cultural identity • Culturally important • Dense Urban (potentially with the setting of minimum density)	• Developing with nature • Fair work • Foundation economy • Green economy • Green jobs • Housing of a reasonable quality • Human Rights and Equality (including link to legislation/guidance) • Live/Work	• Local living • Local monitoring • Low carbon fuels • Major accident hazard site • Nature networks • Nature positive • Nature recovery • Nature restoration • Negative emission technologies • Net economic benefit	• Pipeline of housing development • Positive effects for biodiversity • Prime agricultural land • Renewable energy • Rural areas • Rural places • Wellbeing economy