

APPENDIX 1 – New Development Supplementary Guidance Consultation Replies 2022

Number	Consultee	Summary	Renfrewshire Council Response
01	Network Rail	No comments to make.	Noted
02	Historic Environment Scotland	Confirm that they are content with the draft guidance and have no further comments to offer	Noted
03	Paisley East and Whitehaugh Community Council	No observations to make.	Noted
04	Strathclyde Partnership for Transport	Are supportive of its content and have no further comment.	Noted
05	Dawn Homes	<p>Are comfortable with the majority of the provisions within Supplementary Guidance (SG) and how they would help facilitate the delivery of housing. Note that the SG is focused on the delivery of business and industry developments in specific locations to deliver a strong economy. Dawn Homes feels that a successful housebuilding industry both enables and contributes to the delivery of a successful economy.</p> <p>In terms of connecting places note that there must be the case that a significant number of otherwise effective housing sites are not going to entirely achieve all of the requirements as set out in the SG. Suggest the following changes:</p> <ul style="list-style-type: none"> • In relation to the first criterion, which currently states: ‘Development proposals require to be sited at locations which are well served, etc, etc’ change to <i>Aim to ensure that ...</i>. ‘Require’ is over prescriptive; • In relation to criterion four: ‘Public transport, etc ...’. ‘should’ here does it mean that a degree of pragmatism would be applied to the 400 metre walking distance. PAN 75 states that the 400 metre distance is simply a recommendation and should not be imposed as a mandatory requirement; • Bullet point 11 refers to a ‘proposed requirement’ to provide electric vehicle charging stations as an integral part of new developments or redevelopment proposals. Dawn Homes support this but suggest that, in certain areas, the required overall supply capacity is not available to ensure delivery. 	<p>Noted</p> <p>Policy I1 – Connecting places sets out the policy context for connectivity within Renfrewshire and provides the necessary hooks for the supplementary guidance. The supplementary guidance is reflective of the general thrust emerging from draft NPF4. NPF4 states that development proposals should aim to support sustainable travel and transport based around the 20 minute neighbourhood principal where we are reducing the need to travel unsustainably, decarbonising our transport system and promoting active travel are key. The first criterion in ‘Connecting Places’ is reflective of this approach. No changes required to criteria.</p> <p>The emerging NPF4 states that planning applications for significant travel generating uses should not be supported at locations which would increase reliance on the private car and where access to local facilities via public transport networks would involve walking or wheeling more than 400m. Criterion 4 is no different to current policy, guidance or advice set out by the Scottish Government. No changes required to criteria.</p> <p>Policy I4 – Renewable and Low Carbon Energy Developments provides the policy link from the local development plan for the requirement for electric vehicle charging stations to be an integral part of any new development or redevelopment proposal. The emerging NPF4 states that development proposals should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points that are provided in safe and convenient locations. The criteria in bullet point 11 will be amended to reflect this:</p> <p>Change Page 16, Bullet 11 from</p> <ul style="list-style-type: none"> • Development requires to provide electric vehicle charging stations as an integral part of new development or redevelopment proposals; to • Development should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points as an integral part of new development or redevelopment proposals.

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		<p>Have concerns over the requirement to consider the feasibility of meeting the development’s heat demand through a district heating network as there is no clear guidance against which to test either the ‘feasibility’ or viability for district heating.</p> <p>In relation to commuted sums, the final criterion states ‘Where there is a high concentration of affordable housing in the area and the provision of a commuted sum would help achieve, etc.’ What sources of information does the Council possess that will confirm where the ‘areas of high concentration’ might be? There needs to be accessible information and the Council is best placed to provide this. Expecting the developer to ‘prove’ this point on what would essentially be on an ad hoc basis would be highly unsatisfactory. To implement the policy there has to be a definition of ‘affordable for sale’ which is updated regularly.</p> <p>There should be provision for a hybrid approach to some sites where part of the affordable requirement could be met on site and a commuted sum for the remainder of the requirement to be used elsewhere. The role of the private rented sector in meeting the overall requirements of affordable housing must be recognised.</p> <p>The proposals in the SG for housing in the green belt would lead to an unnecessary increased restriction and this may not allow the delivery of the 2019 Act’s ambition to ‘ensure the long-term stability of rural places’. To require single dwelling applications for housing in the countryside to be tested/assessed against any overall housing land shortfall is an unnecessary burden. The SG should make provision for urban edge sites that offer active travel, 20 minute neighbourhoods, community infrastructure if there are insufficient sustainable and deliverable brownfield sites to meet the LDPs development requirements.</p> <p>Greenbelt boundaries should be accurately identified and not just a boundary around the existing settlement approach.</p> <p>The general thrust of the biodiversity policy is supported however seek clarification on the line ‘To maximise the benefits for a diverse natural environment, new development proposals require to .’ does this requirement apply to all new developments and, if not, where are the guidelines on deciding on where they should apply to be found? The guidelines provided in the Annex are for where the decision that there is a requirement has already been taken.</p>	<p>Policy 14 Renewable and Low Carbon Energy Developments and Figure 10 of the local development plan set the context for heat networks in Renfrewshire. The supplementary guidance is in line with the emerging NPF4 requirements on heat and cooling where heat networks can help contribute to Scotland’s net zero ambitions. No change to supplementary guidance is required.</p> <p>The Council are currently preparing a local housing need and demand assessment to provide a comprehensive and robust evidence base to inform local housing needs, which will inform the application of the affordable housing policy. This information will support the local development plan, supplementary guidance as well as the Renfrewshire Local Housing Strategy ensuring the appropriate delivery of affordable housing provision in Renfrewshire. No change to supplementary guidance is required.</p> <p>As set out in the local development plan Policy P3 Housing Mix and Affordable Housing and the affordable housing section of the supplementary guidance, early discussion at pre-application stage with the planning authority will be required to establish affordable housing requirements and the most appropriate mix of affordable housing to be provided on all sites of 50 or more dwellings. A hybrid approach may be considered appropriate during these discussions. No change to the supplementary guidance is required.</p> <p>Policy ENV1 Green Belt and the supplementary guidance criteria listed on page 38 set out clearly the criteria for where residential developments will be considered appropriate where there is a housing land shortfall which satisfies Policy ENV1 Green Belt and Policy 8 of ClydePlan. The guidance on page 37 of the supplementary guidance relates to all development proposals in the greenbelt and the guidance on page 38 relates to all residential proposals in the greenbelt. This guidance is not limited to circumstances where there is an identified housing land shortfall and contains development guidance which is important to protect Renfrewshire’s greenbelt from inappropriate development. Again in line with current and emerging Scottish Government Policy, the current policy and guidance framework in both the local development plan and the supplementary guidance aims to increase the density of Renfrewshire’s existing settlements, promoting local living by limiting urban expansion and using land around our towns and villages wisely. There is currently no requirement to identify urban edge sites. No change to the supplementary guidance is required.</p> <p>The local development plan clearly identifies a robust green belt boundary and this was reviewed, consulted upon and thoroughly examined through the robust local development plan preparation process. No change to the supplementary guidance is required.</p> <p>The biodiversity section on page 40 links to Policy ENV 2 Natural Environment providing more detailed criteria in the supplementary guidance. This criteria is in line with the emerging NPF4 that states that proposals for local development should only be supported if they include appropriate measures to enhance biodiversity, in proportion to the nature and scale of development. No change is required to the supplementary guidance.</p>
06	Persimmon Homes	<p>Welcome the additional detail and clarity that the proposed guidance offers and continued flexibility of uses within proposed transition areas to allow the regeneration of these areas.</p> <p>Suggested amendments:</p>	Noted

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		<p>Supportive in principle of the criteria listed under Connecting Places on page 16, however it is not practical for all residential developments to give priority to and allowing penetration by buses. It is suggested that this criteria is reworded to read “Where practical make provision within development layouts giving priority to and allowing penetration by buses;”</p> <p>Suggest that depending on the type and scale of residential development it is not practical to provide electric vehicle charging stations in all housing developments. It is suggested that the requirement for electric vehicle charging stations should only relate to non-residential developments. A table detailing development types and what level of provision is desired would provide clarity on this requirement.</p> <p>They recognise the importance of delivering affordable housing within Renfrewshire and that the preferred option is for the units to be delivered on-site there should be a hybrid option as part of the alternatives where some units could be delivered on or off-site and the balance made up of a commuted sum. This will allow flexibility where full provision on-site may not be viable or there is a high concentration of affordable homes in the area already and full provision may not be sought.</p>	<p>Accept proposed amendment. Bullet point 5 on page 16 will be amended from:</p> <ul style="list-style-type: none"> • Ensure provision is made in development layouts giving priority to and allowing penetration by buses; to • Where practical make provision within development layouts giving priority to and allowing penetration by buses. <p>Policy I4 – Renewable and Low Carbon Energy Developments provides the policy link from the local development plan for the requirement for electric vehicle charging stations to be an integral part of any new development or redevelopment proposal. The emerging NPF4 states that development proposals should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points that are provided in safe and convenient locations. The criteria in bullet point 11 will be amended to reflect this:</p> <p>Change Page 16, Bullet 11 from</p> <ul style="list-style-type: none"> • Development requires to provide electric vehicle charging stations as an integral part of new development or redevelopment proposals; to • Development should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points as an integral part of new development or redevelopment proposals. <p>As set out in the local development plan Policy P3 Housing Mix and Affordable Housing and the affordable housing section of the supplementary guidance, early discussion at pre-application stage with the planning authority will be required to establish affordable housing requirements and the most appropriate mix of affordable housing to be provided on all sites of 50 or more dwellings. A hybrid approach may be considered appropriate during these discussions. No change to the supplementary guidance is required.</p>
<p>07 08 09 10 11</p>	<p>Miller Homes Taylor Wimpey Cala Stewart Milne Barratt Homes</p>	<p>Consider that the signposting in the Local Development Plan to the New Development Guidance is inadequate. The LDP document includes under each section a note box that draws the reader’s attention to the policies to which the New Development Guidance will apply but this is not at the beginning of each policy section and therefore could be missed. In addition, the note box is not explicit about which parts of the policy additional detail will be provided for. On this basis we do not believe that the LDP adequately signposts the SPG and therefore question the ability of the SPG, as currently drafted, to be adopted as part of the development plan.</p> <p>Have concerns that in places the guidance goes beyond the scope of the original policy and goes beyond providing further information or detail. In some cases the requirements set out in the guidance should have been part of LDP policy that would then have been articulated and tested as part of the LDP examination. On this basis it is therefore inappropriate for text to be included in just the Guidance.</p> <p>Connecting Places In the opening paragraph the New Guidance states that “All proposals will be considered in line with Policy I1 Connecting Places of the Local Development Plan and the following criteria:”. In order for this to be acceptable the “following criteria” cannot go beyond the provisions of the LDP policy and must only add further information or detail to that policy.</p> <ul style="list-style-type: none"> • Bullet point 1 of the New Guidance states that “Development proposals require to be sited at locations which are well served by public transport and where possible link to public transport hubs and interchanges;”. However, policy I1 requires only that proposals “ensure appropriate provision 	<p>The issue of signposting to the supplementary guidance was examined by the Reporter (Issue 23) and the Reporter recommended that the note boxes be added to provided clarification and to strengthen the links between the local development plan and supplementary guidance. No change is required to the supplementary guidance.</p> <p>Page 7 of the Renfrewshire Local Development Plan clearly sets out the purpose and role of the new development supplementary guidance where it provides additional detailed information in relation to designing, delivering and implementing development, with an emphasis on place making and sustainable inclusive development. No change is required to the supplementary guidance.</p> <p>Policy I1 Connecting Places sets the policy context for the more detailed connecting places criteria in the supplementary guidance.</p> <p>Accept Change – Bullet Point 1 on page 16 will be amended from</p> <ul style="list-style-type: none"> • Development proposals require to be sited at locations which are well served by public transport and where possible link to public transport hubs and interchanges; to

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		<p>and accessibility” to such not for development to be located at sites that are already well served. This is beyond the scope of the policy.</p> <ul style="list-style-type: none"> • Consider that bullet point 2 does not adds anything to that already set out in policy I1. • Bullet point 3 requires “implementation” of new pedestrian routes and Policy I1 does not. It should be noted that development does not always have the means to implement new routes that are beyond their site boundary, it is unreasonable to require such implementation and should therefore be deleted. • Bullet point 4 goes significantly beyond the provisions of policy I1 and as a result is not acceptable. Bullet point 4 states “Public transport networks to be accessible within 400 metres walking distance of the development”. This requirement is far too restrictive and is not supported or justified by local or national policy, guidance or legislative provisions. Furthermore, it will render some allocated development sites undeliverable. It is unclear what the justification is for the 400 metres threshold, how the 400 metres will be measured and whether this will be from the edge of the site or centre of the site. • Bullet point 5 requires development to “Ensure provision is made in development layouts giving priority to and allowing penetration by buses”. This requirement is totally disproportionate. By implication it applies to all development. Developers have no means to force public transport provision. If routes were diverted to meet the requirement of this guidance how will the council ensure that it is not to the detriment of existing residents or businesses. Furthermore, if a development site is located in an area with strong existing transport links that are accessible from the site, it seems unreasonable to ask for further provision to still be required within the site itself. This requirement is not justified as it goes beyond that that is required by policy I1 and it will not be practical, viable or deliverable for all types of development and all development sites. • Bullet point 6 “Aim to ensure, where development is in close proximity to rail stations/halts, that provision is made for good direct, safe access to and from these facilities”. It is unclear why this guidance is required at all when policy I1 states that “All development proposals require to ensure appropriate provision and accessibility including the ability to connect to active travel networks, public transport networks, hubs and interchanges and set out how this can be achieved including through the use of developer contributions, in accordance with Policy I8.” Not all development can provide direct links to nearby rail stations, and this will be dependent on the location of the sites, matters of land ownership and the feasibility to access these. It is therefore considered that this should be required only where appropriate and the guidance should state that, if this provision is to remain. • Bullet point 7 requires that “Connections to and from development are required to be in line with the ‘Getting It Right for Every Child’ approach;”. This is a replication of what is contained in Policy I1 and the guidance provides no further clarity on the type of development that this applies to. 	<ul style="list-style-type: none"> • Development proposals require to be sited at locations which ensure appropriate provision to public transport and where possible link to public transport hubs and interchanges. <p>Bullet point 2 provides further guidance to policy I1. No change required.</p> <p>Accept Change – Bullet Point 3 on page 16 will be amended from</p> <ul style="list-style-type: none"> • Ensure the implementation of safe pedestrian routes to public transport, schools, local services and open space from the proposed site; to • Where required, ensure the implementation of safe pedestrian routes to public transport, schools, local services and open space from the proposed site; <p>Policy I1 – Connecting places sets out the policy context for connectivity within Renfrewshire and provides the necessary hooks for the supplementary guidance. The supplementary guidance is reflective of the general thrust emerging from draft NPF4. NPF4 states that development proposals should aim to support sustainable travel and transport based around the 20 minute neighbourhood principal where we are reducing the need to travel unsustainably, decarbonising our transport system and promoting active travel are key. The first criterion in ‘Connecting Places’ is reflective of this approach.</p> <p>The emerging NPF4 states that planning applications for significant travel generating uses should not be supported at locations which would increase reliance on the private car and where access to local facilities via public transport networks would involve walking or wheeling more than 400m. Criterion 4 is no different than any other current policy, guidance or advice set out by the Scottish Government. No changes required to criteria.</p> <p>Accept this amendment. Bullet point 5 on page 16 will be amended from:</p> <ul style="list-style-type: none"> • Ensure provision is made in development layouts giving priority to and allowing penetration by buses; to • Where practical make provision within development layouts giving priority to and allowing penetration by buses <p>Accept this amendment. Bullet point 6 on page 16 will be amended from:</p> <ul style="list-style-type: none"> • Aim to ensure, where development is in close proximity to rail stations/halts, that provision is made for good direct, safe access to and from these facilities; to • When development is in close proximity to rail stations/halts, where required ensure that provision is made for good direct, safe access to and from these facilities. <p>Bullet point 7 ensures that connections to and from development are required to be in line with the Getting It Right for Every Child approach. No change to the supplementary guidance is required.</p>
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	<ul style="list-style-type: none"> • Bullet point 11 states “Development requires to provide electric vehicle charging stations as an integral part of new development or redevelopment proposals”. This requirement is not a requirement of Policy I1. It is a requirement of policy I4. Note that this provision in the guidance is just a replication of text contained in policy I4 and so is not required in the guidance. Therefore, this provision should be deleted rather than moved to the section dealing with policy I4. • Bullet point 12 requires assessment of transport impacts. There is no requirement in policy I1 for such assessments and therefore this cannot be introduced as a new requirement in the guidance. • Bullet point 13 requires an assessment of air quality, there is no such requirement in policy I1 to link the new requirement to and therefore it should not be contained in the guidance. • Bullet point 14 replicates the requirement in policy I1 for a travel plan but provides no further guidance on scope or content. • Bullet point 15 states that “Masterplans, development briefs and proposals for major developments require to include satisfactory mechanisms or provisions for supporting sustainable transport objectives along with additional infrastructure, facilities and services required to support the development.” The place for such a provision is in the policies of the LDP, not in supplementary guidance and this provision should be deleted. <p>Flooding and Drainage</p> <p>In the opening paragraph the New Guidance states that “All proposals will be considered in line with Policy I3 Flooding and Drainage of the Local Development Plan and the following criteria”. In order for this to be acceptable the “following criteria” cannot go beyond the provisions of the LDP policy and must only add further information or detail to that policy.</p> <ul style="list-style-type: none"> • Bullet points 1, 2, 3 replicates text already contained in policy I3. It is therefore considered that there is no need for this to be in the guidance as it does not add any further detail or clarity to that that is included in the LDP policy. • Bullet point 4 replicates in part the text in policy I3 and should therefore not be included in the guidance but also adds that development “must be demonstrated that the site can be satisfactorily drained.” This is not a requirement of policy I3 and it is not considered that this is further detail to support that policy, rather this is a new provision that should not be made. 	<p>Policy I4 – Renewable and Low Carbon Energy Developments provides the policy link from the local development plan for the requirement for electric vehicle charging stations to be an integral part of any new development or redevelopment proposal. The emerging NPF4 states that development proposals should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points that are provided in safe and convenient locations. The criteria in bullet point 11 will be amended to reflect this:</p> <p>Change Page 16, Bullet 11 from</p> <ul style="list-style-type: none"> • Development requires to provide electric vehicle charging stations as an integral part of new development or redevelopment proposals; to • Development should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points as an integral part of new development or redevelopment proposals. <p>Paragraph 3 of policy I1 Connecting Places provides the hook which further information is provided in bullet point 12 of the Connecting Places section. No change is required to the supplementary guidance.</p> <p>Paragraph 1 of Policy ENV5 Air Quality provides the hook which further information is provided in bullet point 13 of the Connecting Places section as the matter of air quality is related to transport. Air quality assessments criteria is also outline in page 53 of the supplementary guidance. No change is required to the supplementary guidance.</p> <p>Paragraph 6 of policy I1 Connecting Places states the overarching aim of a travel plan, the guidance provided in bullet point 14 provides additional detail and no change to the supplementary guidance is required.</p> <p>Bullet point 15 provides additional detail to policy 11 and I8 which are in line with the emerging NPF4. This also reflects the infrastructure first approach set out in the local development plan. No change to the supplementary guidance is required.</p> <p>Policy I3 – Flooding and Drainage sets the policy context for the more detailed flooding and drainage criteria set out in the supplementary guidance.</p> <p>Bullet points 1, 2 and 3 are key principles which strengthen the Council’s approach to flooding and drainage and are important for sustainable flood risk and water management in line with current Scottish Government and SEPA policy and guidance. They provide further detail to Policy I3 Flooding and Drainage . No change to the supplementary guidance is required.</p> <p>The site being satisfactorily drained is imperative to the implementation of successful sustainable urban drainage systems and is linked to Policy I3 Flooding and Drainage. No change is required to the supplementary guidance.</p>
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- Bullet points 5 and 6 requires that "The capacity of the functional flood plain to store water must not be reduced" and that "Development must not result in additional discharge of surface water" these provisions are not clearly linked to the provisions of policy I3 as written. It is the view that these provisions should have been policy requirements tested through the examination of the LDP not introduced in supplementary guidance. These provisions should therefore be deleted from the guidance.
- Bullet point 7 adds no further detail to policy I3 that requires all development proposals to ensure "that there will be no unacceptable flood risk associated with the development". This provision should therefore be deleted from the guidance.
- For bullet point 8 to be legitimate it must be more clearly linked to the provisions of policy I3.
- Bullet point 9 is largely covered already by policy I3. The exception is the provision about "not compromising the potential for future flood management proposals". This is a new provision and not directly linked to the LDP policy and it seems unreasonable given that such proposals may not necessarily be known at the time of application.
- Bullet point 10 is a new provision not linked to policy I3 and should have been included as a policy provision tested through the LDP examination rather than being introduced in guidance afterwards. This is not reasonable, and this provision should be deleted from the guidance.
- Bullet point 11 is covered in policy I3 so should be deleted from the guidance.
- Bullet point 12 states that "Land raising will not be accepted unless..." yet policy I3 states that "Development which involves land raising will be considered in relation to the risk framework set out in Scottish Planning Policy and SEPAs guideline with effective compensation for any loss of local flood storage capacity secured on a like for like basis". This appears to be a change of policy emphasis between the LDP and the guidance and that is unreasonable and should be deleted.
- Bullet point 13 is a replication of text already contained in policy I3. It is therefore considered that there is no need for this to be in the guidance.
- The New Guidance also states that "Where the risk of flooding is deemed unacceptable, the proposal will not be permitted." This is not a provision of policy I3 and it is not considered appropriate to contain such a statement in the guidance when this is not contained in the LDP policy and should be deleted.

Renewable and Low Carbon Energy Developments

The Guidance states that "An increase in the proportion of electricity produced from renewable sources and the recovery of waste heat will be supported in principle where they are appropriate in terms of the location, siting and design." It is considered that this is a statement of policy that should be in the LDP rather than in supplementary guidance and should be deleted. The Guidance states that "All proposals will be considered against Policy I4 Renewable and Low Carbon Energy Developments of the Local Development Plan having regard to any individual or cumulative significant effects of the development proposal." This para requires all proposals to ensure that the provisions of the bullet points are met. In order for this to be acceptable the bullets listed in the guidance cannot go beyond the provisions of the LDP policy and must only add further information or detail to that policy.

Bullet points 5-12 and 14 of page 17 of the supplementary guidance all provide additional guidance to the implementation of policy I3 and are in line with SEPA's guidance, current and emerging Scottish Government policy. No change is required to the supplementary guidance.

Foul drainage is an important component of sustainable flood risk management, and it is essential that the supplementary guidance outlines the criteria. No change to the supplementary guidance is required.

Policy I3 states that development must not have an adverse impact on existing drainage, increase the risk of flooding..... as well as stating that all development proposals require to demonstrate that there is no unacceptable flood risk associated with development. Where a development cannot demonstrate there is no risk of flooding, considering all of the criteria in the supplementary guidance, then the outcome of this would inevitably be that the proposal is unacceptable.

The supplementary guidance section on Renewable and Low Carbon developments sets the policy context and additional information for Policy I4 which is in line with current and emerging Scottish Government policy, guidance and advice.

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		<ul style="list-style-type: none"> • Bullet point 1 reiterates but adds no further detail to provisions in policy I4 therefore it does not need to be included in the guidance. • Bullet points 2, 4, 5 reflect the bullet points set out in policy I4. However, the bullets in the New Guidance use language such as “no unacceptable adverse”, “no significant unacceptable impact”, “no unacceptable impacts”, “not lead to an unacceptable impact” and there is no clarity on what such impacts would be. The guidance therefore adds little to the provisions in policy I4. <ul style="list-style-type: none"> • Bullet point 3 does not reflect a provision in policy I4 and therefore should not be included. • Bullet point 6 is a repeat of the text in policy I4 therefore should not be included. • Bullet point 8 requires arrangements for restoration. This is not a requirement of policy I4 therefore should not be included. • Bullet point 10 states “Where technically feasible and financially viable, development with a high heat demand should seek to be co-located with and make use of heat supply sources”. This is not a requirement of policy I4 therefore should not be included. • Bullet point 11 replicates the provisions already in policy I4 therefore should not be included. • Bullet point 12 states “Where suitable, the potential to connect new projects to off-grid areas are considered”. This provision goes beyond that of policy I4 and there is no justification of further guidance provided. It is considered that this provision should be removed from the guidance. • Bullet point 13 requires "The scale of contribution from the development to renewable energy generation targets and the effect on greenhouse gas and carbon emissions is fully demonstrated." This is not a requirement of policy I4, It is considered that this provision should be removed from the guidance. • Policy I4 states that “Development should provide electric vehicle charging stations as an integral part of any new development or redevelopment proposal.” It would have been useful for the Guidance to have provided more information and detail on what is expected in this respect and what scale and types of development this will apply to. 	<p>It is considered that bullet point 1 provides additional criteria. No change to the supplementary guidance is required.</p> <p>Accept change. Bullet Points 2 and 5 will be amended so terminology is the same between bullets 2, 4 and 5.</p> <p>Page 18, Bullet point 2 change from</p> <ul style="list-style-type: none"> • There will be no unacceptable adverse impact on the natural or historic environment or water environment within the area; to • There will be no significant unacceptable adverse impact on the natural or historic environment or water environment within the area. <p>Page 18, Bullet point 5 change from</p> <ul style="list-style-type: none"> • There will be no unacceptable impacts on the transport network including Glasgow Airport, additional traffic generation and/or road safety. Proposals must demonstrate that any additional impacts can be mitigated; to • There will be no significant unacceptable impacts on the transport network including Glasgow Airport, additional traffic generation and/or road safety. Proposals must demonstrate that any additional impacts can be mitigated. <p>Bullet Points 3, 6, 8, 10, 11, 12, and 13 provide additional information on the implementation of Policy 14 regarding individual and cumulative effects of renewable and low carbon energy developments. No change is required to the supplementary guidance.</p> <p>Policy I4 – Renewable and Low Carbon Energy Developments provides the policy link from the local development plan for the requirement for electric vehicle charging stations to be an integral part of any new development or redevelopment proposal. The emerging NPF4 states that development proposals should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points that are provided in safe and convenient locations. The criteria in bullet point 11 will be amended to reflect this:</p> <p>Change Page 16, Bullet 11 from</p> <ul style="list-style-type: none"> • Development requires to provide electric vehicle charging stations as an integral part of new development or redevelopment proposals; to
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Affordable Housing

The Guidance does provide additional detail and information in order to implement Policy P3 Housing Mix and Affordable Housing. The New Guidance includes a requirement to engage in early discussions with the planning authority to establish affordable housing requirement. This is supported. However, the Council needs to ensure that the affordable housing requirement is provided at the pre application stage to ensure that developers understand the extent of the affordable housing requirement and the type and level of contribution that will be expected. Also, it is important that this guidance is clear that, as per the policy, affordable housing requirements are “up to 25%” which of course sometimes means the requirement could be zero%. This should be explicitly referred to in the guidance. The Council need to ensure that they have a robust evidence base in place which clearly identifies the level of affordable housing that is required in each housing market sub area in order to inform developers at the earliest opportunity. This has not been the experience of developers bringing forward housing developments in Renfrewshire. For Policy P3 to be effective the Council need to establish what levels of affordable housing, up to 25%, is required for each development site and this needs to be evidenced and justified as a mitigation for the impact of private housing within that particular housing market sub area in Renfrewshire.

The Guidance sets out that it is the Council’s preference that affordable housing should be provided first and foremost on site. The guidance accepts that affordable homes can be built by the developer and sold / let directly and provides no further guidance on the form or format of those homes. In the circumstance where the developer is building units for transfer to the Council or an RSL the guidance requires these units to comply with Scottish Government’s grant funding criteria in terms of their design standards. In the circumstance where the developer is transferring land to the Council or an RSL the Guidance requires this to be serviced and free from constraints. These provisions are supported.

Provisions are made in the New Guidance to guide that process where it may be not possible to provide affordable housing on site and where off site provision may be acceptable. Have concerns about the reference to nil value in bullet point 5, it would be sufficient to say at an agreed value as to say nil value may raise expectations that this is reasonable in every case when it will not be. Whilst in principal it seems this is a reasonable approach, they have concerns about the practicality of what is set out and on balance feel this is not a preferred approach that could rarely be deployed. On this basis it is the view the most practical and realistic course of action if on-site provision is not possible would be the agreement of a commuted sum.

Whilst the Council will allow commuted sums to be paid in lieu of provision of affordable housing on site when off site provision is not possible. The Guidance requires that “Any proposal by a developer to address affordable housing through a commuted sum must be supported by a viability assessment which sets out why on site provision is not suitable.” This is supported. What is not supported is the potential for the Council to unilaterally decide that on site provision should not be the preferred option and that rather they require a commuted sum. This is not reasonable or justifiable if on-site provision is possible or preferable.

It is accepted that in some instances a commuted sum will be a more suitable option, however, the Guidance states that this will be determined independently by the District Value. This can take a significant amount of time and will result in unnecessary delays to a decision being issued and a delay in housing sites coming forward in the short term. Suggest that if a District Valuer is to determine the sum, this should be dealt with at the pre-application stage when discussion takes place on the level and type of contribution required.

- Development should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points as an integral part of new development or redevelopment proposals.

The Council are preparing a local housing need and demand assessment to help understand local needs and to strengthen the evidence base in support affordable housing policy. This will be available to support the LDP, Supplementary Guidance and the Local Housing Strategy for the provision of affordable housing in Renfrewshire.

The 1st paragraph on page 31 will be amended to ensure it reflects the requirements of Policy P3 of the LDP:

‘Early discussion (pre-application stage) with the planning authority will be required to establish affordable housing requirements and the most appropriate mix of affordable housing to be provided on all sites of 50 or more dwellings providing up to 25% of the total site capacity as affordable homes.’

On Page 31, the 1st sentence of the 5th bullet under off site delivery to be amended to read:

- ‘Where the developer is not constructing the affordable housing the site should be transferred to the Council or a Registered Social Landlord at an agreed value.’

As set out in local development plan Policy P3 Housing Mix and Affordable Housing and the Affordable Housing section of the supplementary guidance, early discussion at pre-application stage with the planning authority will be required to establish affordable housing requirements and the most appropriate mix of affordable housing to be provided on all sites of 50 or more dwellings. A hybrid approach may be considered appropriate during these discussions.

A range of options to deliver new affordable homes on site will be considered first before the consideration off-site delivery and a commuted sum.

The Supplementary Guidance clearly sets out the circumstance when off-site delivery and a commuted sum may be appropriate and the method for the delivery of affordable homes for each option. The option of a commuted sum for affordable homes is to deliver the requirements of Policy P3 providing up to 25 % of the site capacity.

The guidance on page 32 clearly sets out the role of the District Valuer or a chartered valuation surveyor in setting the value of the commuted sum. As set out in Page 31 of the guidance early discussion will be required with the planning authority to determine the affordable housing requirements. If developers engage at pre-application stage the number of affordable units required will be agreed early and will form the basis of setting the value of the commuted sum.

No further changes are required to the guidance on affordable housing to address these comments.

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		<p>Would like to see commitment to a standardised approach, the method of determining the commuted sum should be transparent and this should be appended to the Guidance. The total number of affordable homes that the commuted sum will be in lieu of will be up to 25% of the total number of proposed new homes on the site only and this must be justified in terms of need in the local area / HSMA and would also request an acknowledgment that in some circumstances part on-site and part commuted sum would be an option.</p> <p>For the District Valuer to assess the commuted sum the Council first must identify the number and type of housing units to be provided up to 25%. There should be an element of flexibility built in so that if at pre-application stage a commuted sum would be more unaffordable than on site provision the developer would still have the option to provide on-site. Object to the broad areas to which commuted sums paid could be put. The commuted sum paid must mitigate the impact of the development of additional housing market homes in the area. To use the monies otherwise would be unlawful. Monies should also be returned to the applicant if not spent by a specific deadline.</p> <p>Greenbelt Development Criteria Object to 8 of the 12 bullets under the heading of Green Belt Development Criteria as they go substantially beyond the provisions made in Clydeplan Policy 8, SPP and LDP policy ENV1.</p> <ul style="list-style-type: none"> • Bullets 1-4 are concerned with loss of agricultural land, impacts on wild land, traffic and access and public water supply. These are not matters related to green belt objectives as set out in the SPP and should be removed from the guidance. • Bullet points 5 and 6 are linked to the “protecting and providing access to open space” in the SPP therefore acceptable. • Bullet point 7 and 8 are linked to “protecting and enhancing the character, landscape setting and identity of the settlement” in the SPP and therefore acceptable. • Bullet points 8-12 of the New Guidance are concerned with landscape proposals including boundary treatments, the adequacy of services, nature conservation and habitats and the structural soundness of buildings for conversions. These are not matters related to green belt objectives as set out in the SPP and should be removed from the guidance. <p>Biodiversity Assume this section is link to LDP policy ENV2, although does provide more detail than is contained in policy ENV2. The Guidance lacks clarity as to what is specifically required as part of a development and the mitigation measures that would be required. It is also not clear how developments will be assessed against requirements and therefore, it is difficult for developers to use this guidance to inform development proposals. Clear guidance needs to be set out as to what is required, when, the extent of the requirement and how this will be assessed as part of any application to allow developers to ensure this is maximised on site.</p>	<p>Policy ENV1 Green Belt and the supplementary guidance criteria listed on page 38 set out clearly the criteria for where residential developments will be considered appropriate where there is a housing land shortfall which satisfies Policy ENV1 Green Belt and Policy 8 of ClydePlan. The guidance on page 37 of the supplementary guidance relates to all development proposals in the greenbelt and the guidance on page 38 relates to all residential proposals in the greenbelt. This guidance is not limited to circumstances where there is an identified housing land shortfall and contains development guidance which is important to protect Renfrewshire’s greenbelt from inappropriate development. Again in line with current and emerging Scottish Government Policy, the current policy and guidance framework in both the local development plan and the supplementary guidance aims to increase the density of Renfrewshire’s existing settlements, promoting local living by limiting urban expansion and using land around our towns and villages wisely. There is currently no requirement to identify urban edge sites. No change to the supplementary guidance is required.</p> <p>The biodiversity section on page 40 links to Policy ENV 2 Natural Environment providing more detailed criteria. This criteria is in line with the emerging NPF4 that states that proposals for local development should only be supported if they include appropriate measures to enhance biodiversity, in proportion to the nature and scale of development. No change is required to the supplementary guidance.</p> <p>In line with the determination of any planning application, the requirement or not of mitigatory measures will be dependent on the detailed information submitted alongside an development proposal. The mitigatory measures are then unique to the site, development and future requirements, it would not be appropriate to set out a list of universal mitigatory measures.</p>
12	Homes for Scotland	<p>The Guidance in places appears to go beyond merely supplementing policies within the LDP but looks to introduce new and more onerous requirements for developments to meet. This is not an appropriate use of Supplementary Guidance as the principles of policy have not been properly scrutinised or tested as part of the LDP examination. Planning Circular 6/2013 (Development Planning) sets out that there has to be a sufficient hook in the LDP policies to hang Supplementary Guidance.</p> <p>Connecting Places The public transport provision in the SG is too restrictive when compared with Policy I1 of the LDP. The LDP promotes development opportunities in localities beside or close to existing public transport networks.</p>	<p>Policy I1 – Connecting places sets out the policy context for connectivity within Renfrewshire and provides the necessary hooks for the supplementary guidance. The supplementary guidance is reflective of the general thrust emerging from draft NPF4. NPF4 states that development proposals</p>

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	<p>Whereas the SG is unduly prohibitive of development in providing that “public transport networks should be accessible within 400 meters walking distances of the development.” This distance will effectively constrain some allocated and otherwise deliverable sites. This overly prescriptive and restrictive standard needs to be deleted from the SG.</p> <p>The SG requires development layouts to give priority to and allow penetration by buses. This is problematic as it is not practical for buses to access all housing developments and there is no guarantee that the service will divert should this provision be made given that it may also undermine the service to existing passengers. This bullet point is disproportionate and needs to allow greater flexibility depending on the size, layout, and location of the development. The practicality and viability of introducing such measures into a development layout must also be given due consideration.</p> <p>The SG requires that development should provide electric vehicle charging stations as an integral part of any new development or redevelopment proposal. This requirement should only relate to non-residential developments, as residential developments will make their own provision. This is also likely to be a requirement in the Building Regulations Update so it seems unnecessary to duplicate the provision.</p> <p>Flooding</p> <p>The guidance replicates part of the text in policy I3 but also adds that it “must be demonstrated that the site can be satisfactorily drained.” This is not a requirement of policy I3 and it is not considered that this is further detail to support that policy, rather this is a new provision that should not be made. The guidance requires that “The capacity of the functional flood plain to store water must not be reduced” and that “Development must not result in additional discharge of surface water” these provisions are not clearly linked to the provisions of policy I3. These provisions should have been policy requirements tested through the examination of the LDP and should therefore be deleted from the guidance. In relation to existing flood protection mechanisms, it seems unreasonable to introduce the new wording “not compromising the potential for future flood management proposals”, as that information may not be available at the time of a planning application. It is unreasonable to introduce the new requirement under bullet point 10 in relation to engineering works in the water environment and culverting of water courses. This policy was not included in the LDP and so has not been robustly tested through an examination. The bullet point that refers to land raising appears to make the policy provision much more onerous for developments than was published in policy I3 of the LDP. It is not acceptable for the guidance to change the emphasis of the LDP and therefore this clause should be deleted from the SG.</p>	<p>should aim to support sustainable travel and transport based around the 20 minute neighbourhood principal where we are reducing the need to travel unsustainably, decarbonising our transport system and promoting active travel are key</p> <p>The emerging NPF4 states that planning applications for significant travel generating uses should not be supported at locations which would increase reliance on the private car and where access to local facilities via public transport networks would involve walking or wheeling more than 400m. Criterion 4 is no different to current policy, guidance or advice set out by the Scottish Government. No changes required to criteria.</p> <p>Accept this amendment. Bullet point 5 on page 16 will be amended from:</p> <ul style="list-style-type: none"> • Ensure provision is made in development layouts giving priority to and allowing penetration by buses; to • Where practical make provision within development layouts giving priority to and allowing penetration by buses <p>Policy I4 – Renewable and Low Carbon Energy Developments provides the policy link from the local development plan for the requirement for electric vehicle charging stations to be an integral part of any new development or redevelopment proposal. The emerging NPF4 states that development proposals should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points that are provided in safe and convenient locations. The criteria in bullet point 11 will be amended to reflect this:</p> <p>Change Page 16, Bullet 11 from</p> <ul style="list-style-type: none"> • Development requires to provide electric vehicle charging stations as an integral part of new development or redevelopment proposals; to • Development should demonstrate the provision of electric, hydrogen, and other low or zero-emission vehicle and cycle charging points as an integral part of new development or redevelopment proposals. <p>Policy I3 – Flooding and Drainage sets the policy context for the more detailed flooding and drainage criteria set out in the supplementary guidance. The site being satisfactorily drained is imperative to the implementation of successful sustainable urban drainage systems and is linked to Policy I3 Flooding and Drainage. The supplementary guidance provides additional guidance to the implementation of policy I3 and are in line with SEPAs guidance, current and emerging Scottish Government policy. No change is required to the supplementary guidance.</p>
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Residential Use of Centres

The test for the re-development of Institutional Premises is far too onerous. If buildings are not listed and not within a Conservation Area then there is no need for applicants need to go through a test of conversion before re-development can be considered.

Affordable Housing

Early discussion (pre-application stage) with the planning authority on affordable housing requirements is supported. It is imperative that at pre-application stage the applicant is provided with the affordable housing requirement in terms of mix and level. The guidance should be explicit that, as per the policy, affordable housing requirements are up to 25% which can mean the requirement in some instances could be zero.

The council needs to have a robust evidence base in place that clearly identifies the level of affordable housing that is required in each housing market sub area. Homes for Scotland members have not experienced this when bringing forward previous applications for housing developments.

In reference to bullet point 5 it is unreasonable for land to be transferred at “nil value”. An appropriate alternative would be to say at an “agreed value” as nil value will not always be appropriate or practical. It is stated that the site must be transferred to an RSL or the Council prior to the delivery of any units on the primary site. It then states that the land must be accessible, serviced and readily developable. It will be for the Council or an RSL to determine its acceptability. These provisions create too many uncertainties for the developer of the primary site and all aspects of delivery may not be within their control. It is not clear what “readily developable” means as this may not be in control of the applicant.

The provision of a commuted sum in lieu of affordable housing provision in exceptional circumstances is supported. If on site provision is possible then a commuted sum should not be required or requested by the council.

There needs to be early visibility on the scale of any commuted sum. If the District Valuer is to be relied on for the determination of a commuted sum it should be dealt with at pre-application stage to avoid delay later in the process. The method of determining the commuted sum should be transparent and be appended to the Supplementary Guidance. The affordable housing provision should contain flexibility to allow for a hybrid approach in certain cases with a mix of units on-site combined with an element of commuted sum. There should be a reference in the SG to comply with PAN 2/2010. There must be a clear remit for where the commuted sum is to be paid and this should relate to the implications of the new development and the mitigation of those impacts.

The approach set out in the supplementary guidance is to ensure good placemaking in our centres along with encouraging the application of the concept of 20 minute neighbourhoods. Centres are sustainable hubs and the range and choice in these centres is important to strength the resilience. No change to the supplementary guidance is required.

The Council are preparing a local Housing Needs and Demand Assessment to help understand local needs and to strengthen the evidence base in support affordable housing policy. This will be available to support the LDP, Supplementary Guidance and the Local Housing Strategy for the provision of affordable housing in Renfrewshire.

The 1st paragraph on page 31 will be amended to ensure it reflects the requirements of Policy P3 of the LDP:

‘Early discussion (pre-application stage) with the planning authority will be required to establish affordable housing requirements and the most appropriate mix of affordable housing to be provided on all sites of 50 or more dwellings providing up to 25% of the total site capacity as affordable homes.’

On Page 31, the 5th bullet under off site delivery to be amended to read:

- ‘Where the developer is not constructing the affordable housing the site should be transferred to the Council or a Registered Social Landlord at an agreed value. The site must be transferred to the Registered Social Landlord or the Council prior to the delivery of any units on the primary site. Only that portion of the site necessary to effectively deliver the contribution need be transferred. The transferred land must be deliverable and free from constraints. It will be for the Council or an Registered Social Landlord to determine its acceptability’

As set out in LDP Policy P3 Housing Mix and Affordable Housing and the Affordable Housing section of the Supplementary Guidance early discussion at pre-application stage with the planning authority will be required to establish affordable housing requirements and the most appropriate mix of affordable housing to be provided on all sites of 50 or more dwellings. A hybrid approach may be considered appropriate during these discussions.

A range of options to deliver new affordable homes on site will be considered first before the consideration off-site delivery and a commuted sum.

The Supplementary Guidance clearly sets out the circumstance when off-site delivery and a commuted sum may be appropriate and the method for the delivery of affordable homes for each option. The option of a commuted sum for affordable homes is to deliver the requirements of Policy P3 providing up to 25 % of the site capacity.

The guidance on page 32 clearly sets out the role of the District Valuer or a chartered valuation surveyor in setting the value of the commuted sum. As set out in Page 31 of the guidance early discussion will be required with the planning authority to determine the affordable housing requirements. If developers engage at pre-application stage the number of affordable units required will be agreed early and will form the basis of setting the value of the commuted sum.

No further changes to the guidance on affordable housing are required.

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		<p>Housing in the Green Belt The Supplementary Guidance relating to housing in the greenbelt is more onerous than the Renfrewshire Local Development Plan. Specifically, in a shortfall in housing land supply, there should be alignment with the LDP, and the release policy contained in Policy 8 of Clydeplan. However, the SG is too restrictive by way of establishing more criteria for development within the Green Belt. The cumulative impact is the efficacy of the release policy is reduced. The SG should be supplementing the LDP as opposed to fundamentally rewriting policy. Homes for Scotland object to the Green Belt section contained within the SG. This will be particularly onerous to the delivery of homes in Renfrewshire given the shortage of brownfield sites.</p> <p>Biodiversity The Guidance lacks clarity around the extent to which mitigatory or offsetting measures should be implemented, there is no specific metric to be used and it is unclear how local authority planners will assess applications. The Guidance should be looking to support the LDP and not rewrite the policy.</p> <p>Noise The measures provided will be harder to mitigate against given the associated noise around brownfield sites. This will be particularly problematic given the predominant use of these sites moving forward and previous requirements by Environmental Health to consider noise in some scenarios with windows open. This provision should be compliant with PAN 1/2011.</p>	<p>Policy ENV1 Green Belt and the supplementary guidance criteria listed on page 38 set out clearly the criteria for where residential developments will be considered appropriate where there is a housing land shortfall which satisfies Policy ENV1 Green Belt and Policy 8 of ClydePlan. The guidance on page 37 of the supplementary guidance relates to all development proposals in the greenbelt and the guidance on page 38 relates to all residential proposals in the greenbelt. This guidance is not limited to circumstances where there is an identified housing land shortfall and contains development guidance which is important to protect Renfrewshire’s greenbelt from inappropriate development. Again in line with current and emerging Scottish Government Policy, the current policy and guidance framework in both the local development plan and the supplementary guidance aims to increase the density of Renfrewshire’s existing settlements, promoting local living by limiting urban expansion and using land around our towns and villages wisely. There is currently no requirement to identify urban edge sites. No change to the supplementary guidance is required.</p> <p>The biodiversity section on page 40 links to Policy ENV 2 Natural Environment providing more detailed criteria. This criteria is in line with the emerging NPF4 that states that proposals for local development should only be supported if they include appropriate measures to enhance biodiversity, in proportion to the nature and scale of development. No change is required to the supplementary guidance.</p> <p>In line with the determination of any planning application, the requirement or not of mitigatory measures will be dependent on the detailed information submitted alongside an development proposal. The mitigatory measures are then unique to the site, development and future requirements, it would not be appropriate to set out a list of universal mitigatory measures. Page 53 of the Local Development Plan sets out the structure and content of a Noise Assessment. Page 46 Noise provides further information. An additional sentence will be added to the 3rd paragraph that states:</p> <ul style="list-style-type: none"> • The production of a noise assessment will be complainant with Planning Advice Note 1/2011: planning and noise.
13	Scottish Water	<p>Scottish Water is committed to working with Renfrewshire council to help deliver new development within the area and have already been working closely together in the City Deal projects which have featured in the guidance and will continue to provide help and support in ensuring their delivery. Scottish Water would ask then when the developments for the other sites are known, then contact should be made in the first instance to fully understand the water and waste water demands on the system and to highlight any areas where further studies and mitigation may be required.</p>	Noted
14	Scottish Government, including Transport Scotland	<p>Transport Assessment</p> <p>Page 49 - A transport assessment requires to be carried out to quantify the traffic and transport implications arising from intensification of use, change of use or new developments that require planning permission. It can also help prioritise measures which reduce the need to travel, promoting more sustainable patterns of development, reducing car use and encouraging walking, cycling and use of public transport.</p> <p>An early indication of the scale of any potential transport impact arising from a proposed development will influence the level and type of assessment required. The scope of the assessment should be discussed early in the process with the Council and where required Transport Scotland. A Transport Assessment must consider:</p> <ul style="list-style-type: none"> • Existing infrastructure and characteristics of the site and its surroundings; • Baseline transport data; • Travel characteristics including pedestrian and cyclist information; 	<p>Accept proposed changes, the bullet points on page 49 will be amended to reflect this list:</p> <ul style="list-style-type: none"> • Existing infrastructure and characteristics of the site and its surroundings; • Baseline transport data; • Travel characteristics including pedestrian and cyclist information; • Existing public transport provision; • The road network surrounding the site; • Impacts from any committed developments; • Description of the proposed development, including parking provision • Estimates of person and vehicle trip generation for the proposed development; • Proposed access arrangements for walking, cycling, public transport and vehicles; • Proposed transport improvements or potential transport interventions;

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- Existing public transport provision;
- The road network surrounding the site;
- Impacts from any committed developments;
- Description of the proposed development, including parking provision
- Estimates of person and vehicle trip generation for the proposed development;
- Proposed access arrangements for walking, cycling, public transport and vehicles;
- Proposed transport improvements or potential transport interventions;
- How the location, layout and design of the development will influence the choice of travel mode, potentially through preparation of a Travel Plan;
- The transport implications of freight or service operations;
- Likely content of any planning obligation (Section 75 Agreement); and
- Road safety, and the need for a road safety audit.

Parking

Page 16 - Reference to vehicle parking on p16 states that 'The provision of parking for vehicles... is made in accordance with national standards' and p15 states that in respect of hot food takeaways, 'suitable parking and servicing arrangements must be provided to serve the proposed use.' Consider that these references could be amended to better reflect emerging policy in draft NPF4 which does not include national standards and encourages low levels of parking in suitable locations. The provision of parking should be considered locally, in line with national guidance. With regards to hot food takeaway, there may be locations where parking is not required, requiring suitable access, especially by sustainable modes, in more in line with the direction of travel of national policy.

Freight

Page 6 – Refers to Burnbrae, Linwood and the potential to develop an Intermodal terminal providing sustainable road/rail freight transfers, with opportunities to remove goods vehicles from the road network. Consideration could also be given to how other important freight sites e.g. Hillington / Renfrew could be made more sustainable and support the decarbonisation of freight.

Airports

Page 7 - States that there is an 'Opportunity to enhance access to Glasgow Airport' Further, there is support for uses such as car parking and storage and distribution. This should say access by sustainable modes in order to better reflect transport policy ambitions in NPF4 and NTS2. Also suggest compatible uses also include transport links by sustainable modes.

Vacant and Derelict Land

Whilst there is evidence that the draft supplementary guidance references a requirement to consider the re-use or re-development of brownfield land before new development takes place on greenfield sites we suggest a stronger position could be adopted given the strengthened policy position on vacant and derelict land and buildings in the current draft NPF4.

- How the location, layout and design of the development will influence the choice of travel mode, potentially through preparation of a Travel Plan;
- The transport implications of freight or service operations;
- Likely content of any planning obligation (Section 75 Agreement); and
- Road safety, and the need for a road safety audit

Accept Change

Bullet point 6 on page 15 will be amended from:

- Suitable parking and servicing arrangements must be provided to serve the proposed use; to
- Where required, suitable parking and servicing arrangements must be provided to serve the proposed use.

Bullet point 9 on page 16 will be amended from:

- The provision of parking for vehicles, including disabled parking and parking for cycles and motorcycles, is made in accordance with national standards; to
- Development proposals should consider the need to supply safe and convenient cycle parking, and where appropriate motorcycles, visitor parking and disabled parking with consideration given to the type, mix and use of development, car ownership levels, the surrounding uses and the accessibility of the development by sustainable modes when considering parking provision for other vehicles.

Accept Change Page 6 Hillington/ Renfrew North – Challenges / Opportunities add new line after 2nd paragraph:

Opportunity to consider more sustainable modes of transport and the decarbonisation of freight.

Accept Change Page 7 Area to the north of Paisley Town Centre – Challenges/ Opportunities.

Sentence will be amended from:

- Opportunity to enhance access to Glasgow Airport and the Advanced Manufacturing and Innovation District Scotland; to
- Opportunity to enhance access to Glasgow Airport and the Advanced Manufacturing and Innovation District Scotland through sustainable modes of travel and transport.

The overarching nature of this is reflected in the implementation of the spatial strategy as well as the policies and proposals of the local development plan as well as throughout the guidance and advice of the supplementary guidance . No change to the supplementary guidance.

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15	Mr Kerry Mackendrick	<p>Page 42 – Regional Parks Add an additional bullet point</p> <ul style="list-style-type: none"> It complies with the Policies in the NPF4 issued by the Scottish Government <p>The proposed development at Burnfoot Road appears contrary to NPF4 policies as it is on green belt land, within Clyde Muirshiel Regional Pak, on land that has been in productive agricultural use for the past 4 years and in a designated flood risk area.</p> <p>Page 46 – The Water Environment Add an additional bullet point</p> <ul style="list-style-type: none"> Assessment is required of existing surface water and foul drainage systems to water treatment plants, where large scale new housing or commercial development is proposed, regarding the potential hazard to public health from flooding discharges into river and inland loch waterways, and increased future risk predicted due to climate change. 	<p>The local development plan and new development supplementary guidance are written within a policy hierarchy and reflect the aspirations of national polices. No change to the supplementary guidance is required.</p>
16	SEPA	<p>It is our understanding that the supplementary guidance provides additional information in respect of policies, set out in the local development plan, which specify which matters are to be dealt with in supplementary guidance.</p> <p>Flooding and Drainage It may be sensible to consider updating the guidance when NPF4 is enacted and stating this revision as a future action.</p> <p>SEPA has no issues with the flood risk criteria set out in the supplementary guidance and welcomes the further references to a precautionary approach and avoidance, being included in the first two criteria.</p> <p>We believe that the supplementary guidance may be further enhanced if the following points are included.</p> <ul style="list-style-type: none"> A specific reference to climate change (CC) and design standards for flood risk and land use planning decisions and Renfrewshire’s Drainage Impact Assessment guidance. SEPA recommend a CC allowance for all development. Renfrewshire Council declared a CC emergency in 2019 and may wish therefore to consider if an allowance for CC for new developments should be a requirement. You may wish to consider requiring new development either avoids the 200yr plus CC floodplain (as proposed in the draft NPF4) or include it within the setting of Finished Floor Levels (FFL) (200yr plus CC plus freeboard). Reference to SEPA’s vulnerability guidance would be helpful in understanding the context of development proposals and flood risk expectations. It is entirely possible that development protected by a Flood Protection Scheme will be proposed. We would therefore recommend a reference to SEPA’s Planning Information Note 4 (PIN4) which outlines our position relating to proposed development protected by a Flood Protection Scheme. The position is embedded in SEPA’s Flood Risk Planning Guidance and reflects our interpretation of Scottish Planning Policy 2014 (SPP) and our duties under the Flood Risk Management (Scotland) Act 2009. SEPA require safe pedestrian access/egress in the event of flooding. Renfrewshire Council may wish to consider also including a requirement for safe vehicular access/egress. <p>Air Quality SEPA welcomes the Council's position that an air quality assessment will be required close or adjacent an Air Quality Management Areas(AQMA). There have been no exceedences within the 3 AQMAs (Paisley,</p>	<p>One NPF4 is adopted it will form part of the Development Plan for Renfrewshire and will provide the most up to date policy position in the assessment of planning applications. No change to the supplementary guidance is required</p> <p>Noted.</p> <p>Accepted:</p> <p>Page 17 – Flooding and Drainage, bullet 1 will be amended to read, ‘Development proposals require to adopt a precautionary approach to the reduction of flood risk from all sources and comply with the principles of sustainable flood risk management and strengthen resilience to the current and future impacts of climate change in line with Scottish Government policy.’ Page 51 of the guidance sets out the requirements of a Flood Risk Assessment, bullet 1 will be amended to read ‘ Identifying and quantifying the source of flooding taking into account the effects of climate change’.</p> <p>Policy 13 and the associated guidance in the supplementary guidance is clear that national policy and SEPA’s guidance on flood risk and drainage requires to be considered when preparing development proposals. There is no need to repeat this guidance in the supplementary guidance. No amendments are required.</p> <p>An additional bullet point will be added to page 17 – Flooding and Drainage which will read, ‘It has been demonstrated that a safe operation and access/egress can be achieved during the design flood event.’</p>

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	<p>Johnstone and Renfrew) for several years so by rights they could be revoked. However, their annual progress report has highlighted several major developments which may impact on air quality in the future and the supplementary guidance should enable the mitigation of any potential air quality impacts.</p> <p>Renewable and Low Carbon Energy Developments proposals Planning is instrumental in securing both passive and active energy efficiency measures within development by supporting appropriate development densities in the right places, ensuring building and development layouts maximise solar gain, and securing planting and other means for natural cooling. The SG should include efficiency requirements to ensure that the policy requirements can be delivered in practice.</p> <p>The SG provides a useful overview of the land use planning policy context of renewable and low carbon energy development within the council boundary, noting the constraints for wind development because of Glasgow Airport. The document provides clear guidance on the requirements to which planning applications for renewable and low carbon energy developments must adhere. The following comments provide additional information to further support the objectives of the document.</p> <p>There are no references to Local Heat and Energy Efficiency Strategies (LHEES) within the document. The implementation of LHEES has yet to commence and this complicates the integration of strategies which contain spatial information and policy guidance relating to development opportunities for Renewable and Low Carbon Energy. However as outlined in the Heat in Buildings Strategy (October 2021), LHEES documents will provide a framework for taking an area-based approach to heat and energy efficiency planning and delivery, and their development processes will provide an important platform to consider both local community and wider national infrastructure issues. It is therefore important that the SG is cognisant of LHEES and potential opportunities for identifying and delivering appropriate energy generation proposals and that meaningful policy levers are embedded within the document as far the council sees fit.</p> <p>SEPA currently, in line with the Thermal Treatment of Waste Guidelines 2014, requires a Heat and Power Plan to be submitted with any planning application for an energy from waste facility. You may wish therefore to include a reference to the requirement for Heat and Power plan submissions.</p> <p>We recommend the inclusion of a requirement for applications for renewable or low carbon energy developments to include proposals for energy storage on site wherever possible.</p> <p>Under the heading of Tourism, is a requirement for development proposals to include the incorporation of a design which promotes energy efficiency and the use of low carbon generating technologies. We support this requirement and would request that it is extended to all development types to reduce energy consumption as far as possible within new development proposals.</p>	<p>Page 47 of the supplementary guidance is clear that ‘any potential significant impact on local air quality from development within or adjacent to the existing air quality management areas will require to be mitigated.’ No change required.</p> <p>Policy 17 Zero and Low Carbon Buildings of the local development plan and associated guidance in the supplementary guidance provides a policy framework to support this. In addition, Renfrewshire’s Places Design Guidance provides design advice in relation to delivery of sustainable development. No amendments to the supplementary guidance are required.</p> <p>The local development plan and associated guidance in the supplementary guidance provides a policy framework to support the preparation of Local Heat and Energy Efficiency Strategies (LHEES) as they emerge. No change to the supplementary guidance is required.</p> <p>Page 18 of the supplementary guidance requires SEPA’s Thermal Treatment of Waste Guidelines must be followed where development involves recovering energy from waste. It is not necessary to repeat the requirement of this guidance.</p> <p>New bullet added to Page 18 to read ‘development proposals for renewable or low carbon energy developments to include proposals for energy storage on site wherever possible’.</p> <p>Policy 17 Zero and Low Carbon Buildings of the local development plan addresses this. No amendments to the supplementary guidance are required.</p>
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