

Glasgow City Council Response

Glasgow City Council welcomes the publication of the draft LDP regulations and guidance and values the opportunity to review and feedback on the content. We have outlined in our response below our interested in working with the Scottish Government and other partners to help further shape and provide further insight on a range of specific elements.

PART A – Introduction

Q1: Do you agree with the principle that regulations be kept to the minimum necessary and that more detail be provided in guidance and kept updated? Yes / No / No View. Please explain why you agree or disagree.

Glasgow City Council (the Council hereafter) agrees with this position. The guidance is the appropriate area to be kept up to date. Policy will naturally evolve overtime in response to a changing landscape, new development types and court decisions. How policy should be implemented and interpreted needs to respond to changing circumstances; not the regulatory requirements per say.

Q2: i) Do you have any views on the content of the interim assessments? Yes / No. Please explain your views. ii) Do you have or can you direct us to any information that would assist in finalising these assessments? Yes / No. Please provide or direct us to the information.

No further comment.

Q3: i) Do you have any views on the Fairer Scotland Duty and Strategic Environmental Assessment screening documents? Yes / No. Please explain your views. ii) If you consider that full assessments are required, please suggest any information sources that could help inform these assessments.

We agree that the Fairer Scotland Duty is a useful contribution in identifying the spatial nature of inequality. It is appropriate to use an evidence base to inform strategies to tackle inequality due to geographic and interconnected nature of disadvantage.

The impacts of deprivation span many thematic policy areas. The evidence base approach identifies impacts not only to the physical/ natural environmental but also the economic and psychological as borne out by health and wellbeing impacts, criminality, access to employment and a range of other negative indicators.

Therefore, an evidence base informed approach facilitates the application of the Place Principle in helping address physical and public service interventions necessary in tackling often intractable, multi-faceted place-based issues.

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Q4: Do you agree with the proposals for regulations relating to the form and content of LDPs? Yes / No / No View. Please explain why you agree or disagree.

Agreed. The Planning Act identifies considerable requirements in the preparation of the spatial strategy. This is considered sufficient in informing a comprehensive spatial strategy.

Regarding a schedule of land ownership (a) insert description of land, the inclusion of a site location map would be useful. The description should include the address of the land and be sufficient to identify it (the requirement for any address to contain at least two roads would be useful).

It is acknowledged that new style LDPs are to be more map based, rather than focusing on written policy content. However, in addition to not over specifying what maps are to be contained beyond the Proposals Map, concerns exist over restricting the degree to which local planning authorities can draft policies, both in terms of outcomes on the ground but also in terms of the removal of local democratic involvement over local thematic policy development.

It would be useful to make a clear distinction between maps within the Local Development Plan which become fixed at adoption and provide a policy view at that point in time and other maps which inform the policy of the Local Development Plan such as open space and land use auditing maps which are tools for decision making. For example, the open space map, local sites of importance for nature conservation (L-SINCs), or housing land audits, inform the Local Development Plan (and can be updated as and when Local Authorities wish) but are not the actual Development Plan.

Maps that form part of the Local Development Plan should only be those to which the planning authority has control – TPOs, conservation areas, housing allocations etc.

The Council would welcome wider coverage of the 6 qualities of place in Section C - Thematic Guidance, particularly since LDPs are expected to be place-based, visual plans. The reference to 6 qualities of place presents a useful optic for how principles/ aspects of productive places, distinctive places, sustainable places and liveable places can be demonstrated illustratively.

Pages 26 and 27 of the best practice guide Designing for a Changing Climate: Planning Reform by Architecture & Design Scotland outline general principles for content and graphic communication for development plans should be lifted from Annex A to the main body.

The Council recognises that the LDP guidance forms an important communication tool to engage and inform a range of stakeholders in the local development plan preparation process. As such the use of more diagrams

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within the guidance to explain concepts and the internal relationships between different parts, themes and activities in the guidance, would be very welcome.

Q5: Do you agree with the proposals for regulations relating to the preparation and monitoring of LDPs? Yes / No / No View. Please explain why you agree or disagree.

Agreed. The list of consideration in Annex B is comprehensive and the incorporation of the Control of Major Accident Hazards Regulations 201510 a pragmatic one.

Q6: Do you have views on additional information and considerations to have regard to when preparing and monitoring LDPs? Yes / No / No View. Please explain your views.

The information and considerations listed at Regulation 8 to inform the LDP are deemed to provide an extensive and challenging framework. No further comments.

Q7: Do you agree with the proposals for regulations relating to the Evidence Report? Yes / No / No View. Please explain why you agree or disagree.

We partially agree with the proposals for regulations relating to the Evidence Report.

Relating to the Evidence Report, it is helpful that regulations specify the stakeholders with whom consultation should take place. It is further agreed that the inclusion of a Participation Statement, containing how, when and on what the council will consult about is useful. The provision of detail in guidance facilitates a bespoke, area specific approach appropriate to the local situation, although we note that this may lead to communities receiving different levels of information and an increase in resources required to facilitate approach.

It is agreed that using the guidance to inform the relevant evidence required for different aspects of land use provides more flexibility than regulation. However, it is unclear as to the process to be used by an 'appointed person' in coming to a determination as to the 'sufficiency' of evidence presented in the Evidence Report. The publication of further guidance to be used by an appropriate person in assessing Evidence Reports would be welcomed. This may include advice relating to consistency of the assessment process, the use of a standardised assessment proforma and the production of a statement of conformity report by the appropriate person to succinctly explain the assessment process rationale and weight attached in key aspects of the Evidence Report. The current suggestion that the procedure to be followed in an assessment of an evidence report under section 16B(8) of the Act is to be 'at the discretion of the appointed person', is unclear and could lead to inconsistency and avoidable work by both parties. We would welcome further consideration of this section.

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The development and inclusion of a clear diagram which sets out the key stages in the Evidence Report preparation process (and leading into the other stages in the plan making process) by way of potential timeline or route map would be helpful to use and share as a communication tool with other stakeholders involved or interested in the process.

Q8: Do you agree with the proposals for regulations relating to the preparation and publication of the LDP? Yes / No / No View. Please explain why you agree or disagree.

We largely agree with the proposals for regulations relating to the preparation and publication of the LDP.

We agree that the procedures for the proposed LDP are analogous with the previous system, notwithstanding to removal of references to SDPs, MIRs etc and we support changes through regulation.

We support the statutory requirements in primary legislation for Development Plan Schemes to include a Participation Statement, including consulting the public at large in preparing the plan. We agree that any further details regarding the nature of persons to be consulted on the Proposed Plan, should be identified through guidance.

We agree that Section 18(1)(e) of the Act provides adequate arrangements regarding notification of the Proposed Plan to be set out in regulations and support proposal to maintain current requirements unchanged in replacement regulations.

Q9: Do you agree with the proposals for regulations relating to the examination of the LDP? Yes / No / No View. Please explain why you agree or disagree.

We disagree with this position. Clarification of why the Evidence Report and Examination costs have been linked would be helpful if they are intended as two separate and distinct processes. It would be helpful for the regulations to set out any distinguishing features (and the relevant costs/ savings) between the two processes so that the local authority and the appointed person are clear about what can and cannot be examined/ re-examined at this stage.

Here is further description of our queries on this aspect of the regulations.

It is noted that under paragraph 15 the Scottish Government considers it appropriate for regulations relating to the costs, procedures and assessment at examination, to be consistent with the equivalent associated with production of the Evidence Report. Given the key role of the Evidence Report in the new LDP process, this is tantamount to requiring the local authority to pay for two examination processes. There is concern that the evidence report may cost considerably more than the examination process, given that it is expected to frontload and expedite the examination process and it is to include an unattributable amount of information and consultation. It is not clear the regulations support the frontloading requirement but given that the examination remains largely intact in its position as the formal examination/

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re-examination of the entire plan, further consideration of this matter would be welcomed. Even if costs are shown to be equivalent, the chances are that two separate processes of examination are likely to cost more and take longer than the single examination process previously described by the regulations, if the examination process remains largely intact from the previous planning system.

Q10: Are there matters you wish to highlight relating to amendment of the LDP which may have bearing on the proposals for regulations being consulted on in this document? Yes / No / No View. Please explain your view.

Regarding the 2019 Act introducing the ability to amend LDPs at section 20AA, it is acknowledged that the Scottish Government do not intend to commence these parts of the Act at present. Contingent on having the opportunity to contribute to any consultation exercise regarding further consideration of regulations and guidance for amending LDPs once the new development planning system is in place, would be welcomed.

Q11: Do you agree with the proposals for regulations relating to Development Plan Schemes? Yes / No / No View. Please explain why you agree or disagree.

Agree. The proposed regulations still allow for flexibility and accommodation of unforeseen delays in timetabling LDPs whilst providing a requirement to update timelines to maintain certainty. The proposed necessary amendments and additional matters in regulations, see Annex B, Regulation 21 are deemed appropriate.

Q12: Do you agree with the proposals for regulations relating to Delivery Programmes? Yes / No / No View. Please explain why you agree or disagree.

We agree with the proposals for regulations relating to Delivery Programmes. We agree with the proposed amendments (See Annex B, Regulation 22) and support the continuation of the 2008 Regulations (regulation 26) regarding the content of the Action Programme.

Q13: Do you agree with the proposals for regulations relating to the meaning of 'key agency'? Yes / No / No View. Please explain why you agree or disagree.

We agree with the proposals for regulations relating to the meaning of 'key agency'.

Q14: Do you agree with the proposals for regulations relating to transitional provisions? Yes / No / No View. Please explain why you agree or disagree.

Provisions would benefit from a description of how existing plans should be dealt with as they move beyond being 5 years old as well as how newly adopted plans should be treated. Therefore, we do not currently agree with the position set out and would welcome further consideration on this matter.

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In addition, we would strongly welcome the creation of additional guidance on adapting ‘old style’ supplementary guidance (where appropriate) into the new style local development plans, which recognise the increased emphasis on use of imagery and minimising policy wording while ensuring the fine-grained detail required for decision making, is not lost. The Council would welcome the opportunity to work with the Scottish Government and other partners to develop this guidance on creating more place and location focused policy and could provide insight from a diverse and dense urban context.

PART C – Draft Guidance on Local Development Planning

Q15: Do you agree with the general guidance on Local Development Plans? Yes / No / No View.
Please explain why you agree or disagree.

We agree that decisions on planning applications are to be made in accordance with the Development Plan. However, greater clarity is needed to inform what weight or role the local development plan will have as compared with the national planning framework, and in particular, to what extent local policy is subordinate to national policies.

Whilst the local plan still has responsibility for developing the spatial strategy, guidance calls for its expression through the use of maps, site briefs and masterplans rather than in written text employing minimal policy wording, with the emphasis on places and locations, the following suggests applications should be determined with emphasis being given to the national planning framework.

For thematic policies, detail is contained in National Planning Framework, which has the status of the Development Plan in decision making.

In line with our response to Q14, we would strongly welcome the creation of additional guidance on adapting ‘old style’ policy (where appropriate) into the new style local development plans, which recognise the increased emphasis on use of imagery and minimising policy wording while ensuring the fine-grained detail required for decision making, is not lost. As above, the Council would welcome the opportunity to work with the Scottish Government and other partners to develop this guidance.

Q16: Do you agree with the guidance on Development Plan Schemes? Yes / No / No View. Please explain why you agree or disagree.

Notwithstanding the preparation and publishing of a Development Plan Scheme including a Participation Statement outlining when consultation is likely to take place, with whom and its likely form, including the steps to be taken to involve the public at large, it may not be possible to include consultation with Local Place Plan working groups.

There is a potential risk that the proposed guidance may result in unnecessary duplication. For example, the participation statement needs to have been consulted upon (and revised following public feedback) and may result in a

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situation where some of the consultation in the following year will be the required consultation on the next participation statement.

It is suggested that Local Place Plan or Regional Spatial Strategy consultation are not included in the DPS as Local Development Plan teams are not always responsible for producing them (such is the case for Glasgow).

Q17: Do you agree with the guidance on the Delivery Programme? Yes / No / No View. Please explain why you agree or disagree.

We partially agree with this. For example, keeping the Delivery Programme under review and updated at least every two years poses a challenge for resources given a new onus on engaging with infrastructure providers and updating viability assessments.

Regarding the Housing Supply Pipeline, there is a significant amount of confusion because it is not clear whether the Housing Land Audit and the Housing Supply Pipeline are the same thing, and how they relate to the Housing Land Requirement (HLR).

In the case where land is developed ahead of assumed programming, and that allocations programmed for later in the pipeline are to be brought forward, clarity is called for regarding what this would likely necessitate (e.g. a new call for sites, SEA, consultation, a whole plan review cycle?) Where the lack of supporting/ enabling infrastructure is at issue, how should the infrastructure first approach be applied?

We acknowledge that it is often challenging to bring forward sites that are programmed later in the supply (hence the reason for them being programmed later). Deallocation of sites could also become an area of dispute between private and publicly controlled sites. For instance, where private owners or builders would accept deallocation, or conversely, the pressure may be brought from Homes for Scotland for deallocation of publicly owned sites.

The current guidance lacks sufficient detail to determine how the MATHLR figures should be interpreted. We would welcome greater clarity on whether the MATHLR is the number of homes that must be built or is the amount of land that should be identified to allow for 25% fewer homes to be built? We recognise that this ambiguity has implications for site identification and infrastructure funding. For example, if the HLR (i.e. the pipeline) must be delivered in full, then all the necessary infrastructure must be costed and delivered to do so.

A key concern regarding the proposed approach in guidance is raised regarding the observation that the HLR is 25% more than the expected number of new households. If all the homes were to be built it does not follow necessarily that sufficient people will exist to put in these extra homes (or use the services and infrastructure). We suggest the guidance needs to cover the eventuality that despite all the sites that we want to consider as part of the pipeline being action programmed and costed, a situation may arise that despite having sufficient land, we might not have enough commitment from partners to actually deliver sites in the necessary timeframe (because they

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know 25% of all homes are not needed). The Council would be happy to work with the Scottish Government to provide any further local insight on these aspects.

Q18: Do you agree with the guidance on Local Place Plans? Yes / No / No View. Please explain why you agree or disagree.

We partially agree with this position. We would welcome further clarity in the guidance on the relationship of Local Place Plans (LPPs) contributing to the LDP development. For example, how should LPPs be spatially prioritised, what resources will be made available and when should they be prepared e.g. what is the cut-off point/stage for informing the LDP? We recognise that some of this information is outlined within the LPPs circular produced however suggest the LDP guidance needs to reflect and consider this more explicitly as the different levels of local plan preparation will be intrinsically linked.

Q19: Do you agree with the guidance on the Evidence Report? Yes / No / No View. Please explain why you agree or disagree.

We partially agree with this however recognise that deliverability was cited as a weakness of Strategic Development Plans and consequently the onus to deliver infrastructure has been moved to local development plans.

A key component of the Evidence Report will be in facilitating an infrastructure first approach through a robust assessment of current infrastructure capacity leading to an understanding of future infrastructure requirements.

The local development plan (Delivery Programme) should identify what infrastructure for each allocated site is needed; provide indicative infrastructure costs; timeline phasing of delivery; identify who is responsible for delivery; what actions are required from different parties for its delivery; and funding sources/ mechanisms to enable delivery. Where developer contributions are sought, details of the contribution mechanism being used should be provided; and how development viability has been factored into the funding approach.

This places a new emphasis and reliance on contributions. We would welcome greater consideration and acknowledge of the upskilling and resourcing implications in delivering this new requirement. For example, managing the affordable housing contributions that are anticipated, is likely to be a significant new resource challenge (e.g. potentially a new post) to the Council.

In addition, we would welcome the development of detailed guidance on a nationally implemented methodology for calculating infrastructure need in terms of scope, methodology and mechanisms, and in identifying/ costing infrastructure needs of development plans?

Whilst an understanding of local planning authority costings may be relatively attainable e.g. the open space standards being set out the basis for future developer contributions, a true infrastructure first approach will require an understanding of all infrastructure needed to deliver the local development

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plan, much of which is provided by non-Local Authority sources. We recognise that it is unlikely that Local Authorities currently possess the knowledge/ expertise to undertake a whole plan costing exercise including a need for land value uptake assessment and a robust list of potential infrastructure requirements. Financial Viability Assessments conducted at the plan level, should help ensure planning policies are realistic and cumulative costs do not undermine deliverability of the plan. Should a Financial Viability Assessment be produced, we would welcome guidance being provided to clarify a course of action for when the sums and commitments do not add up to the 'need'. For example, we need 10,000 affordable homes but can afford only 5,000. Should the plan show the 5,000 that can be delivered or the 10,000 that are needed, or the 20,000 for flexibility to ensure the 5,000 can be built? Which of these should be assessed...should the assessments be cumulative?

Place-based

'A place-based approach will be informed by the Evidence Report. Building on infrastructure first, a powerful spatial strategy should identify site allocations with design aspirations spelled out through masterplans and site based policies.' Further guidance is required as to how much detail will be deemed sufficient given the emphasis on delivery, placemaking and infrastructure, and 20-minute neighbourhoods and who should lead, inform, produce and resource such assessments?

For example, Masterplan Consent Areas are potentially useful but require commitment and speculation from the Local Authority that the resource spent on creating them, will generate development without requiring further consents. They also remove any income the Local Authority may have raised from the pre-application/planning applications that would have arisen otherwise.

Further guidance is required as to what constitutes acceptability of a 'statement of community benefit' for sites of 50+ units? For example, should the statement be linked/ bound to the Delivery Programme and by what mechanism? For example, can Local Authorities link 'statements' to wider green infrastructure, transport and 20 Minute Neighbourhood goals? Is encouraging car dependency sufficient grounds for refusal?

Q20: Do you agree with the guidance on the Gate Check? Yes / No / No View. Please explain why you agree or disagree.

Please see Question 7 comments regarding additional clarity on the function of the appointed person relating to sufficient information, the need for additional guidance on the gate check process and clarity on costings.

Q21: Do you agree with the guidance on the Proposed Plan? Yes / No / No View. Please explain why you agree or disagree.

Please see previous comments regarding the challenges for resourcing and upskilling planning authorities regarding delivering an infrastructure first

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based spatial strategy and in addition, in implementing carbon net zero, biodiversity net gain, whole plan infrastructure costing and ‘taking into account long term future climate risks’.

Clarity is sought regarding the relationship between the Housing Land Audit and the housing supply pipeline, and the relationship between the Housing Land Requirement and MATHLR. This will add clarity to the circumstances under which an appointed person issues a Housing Land insufficiency note.

Q22: Do you agree with the guidance on Local Development Plan Examinations? Yes / No / No View. Please explain why you agree or disagree.

Please see Question 9 comments.

Q23: Do you agree with the guidance on Adoption and Delivery? Yes / No / No View. Please explain why you agree or disagree.

The Council agrees with this position.

Q24: Do you agree with the proposed guidance on the Evidence Report in relation to the section on Sustainable Places (paragraphs 240 – 247)? Yes / No / No View. Please explain why you agree or disagree.

The Council would welcome further consideration of these related aspects. Regarding a methodology for calculating biodiversity net gain, neither the draft NPF4 policy, or the ‘Developing with Nature guidance (NatureScot has consulted on), sets out an agreed approach to the degree to which nature has to be enhanced and the method for assessing it.

It is crucial that the Scottish Government provide a nationally implemented standardised method of calculation to avoid individual planning authorities developing their own approaches. Reliance on individual developers would result in Local Planning Authority officers and/or developers having to gain an understanding of a variety of different methodologies and approaches rather than just one agreed through NPF4. The Council would be happy to work with the Scottish Government and partners to contribute to the development of this assessment method.

The Evidence Report needs to be informed by the Play Sufficiency Assessment (PSA), which needs to have been prepared, consulted on and approved prior to submission of the Evidence Report. Open Space Strategy (OSS) and PSA guidance indicates that the PSA and OSS should be prepared together. The suggestion is these both need to be prepared, consulted on and approved prior to the Evidence Report being submitted. This represents a substantial challenge for resourcing and the pace of the evidence gathering stage.

No. Regarding Carbon Net Zero calculation methodology. See answer to Question 28.

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No. Regarding Infrastructure First calculation methodology. See answer to Question 19.

Q25: Do you agree with the proposed guidance on the Evidence Report in relation to the section on Liveable Places (paragraphs 248 – 283)? Yes / No / No View. Please explain why you agree or disagree.

The Council has raised concerns within our response to the draft NPF 4 on the implications of policy 13 in NPF 4 and introduction of the ‘future functional floodplain’ definition significantly restricting the long-term regeneration potential of the River Clyde corridor within the city.

Q26: Do you agree with the proposed guidance on the Evidence Report in relation to the section on Productive Places (paragraphs 284 – 296)? Yes / No / No View. Please explain why you agree or disagree.

The Council do not agree fully with this position. For example, regarding guidance provided about Land and Premises for Business and Employment, *Business Land Audits should be undertaken regularly – including details of location, size, planning status, existing use, neighbouring land uses, any significant land use issues of sites and the Evidence Report should establish the requirement for employment land.*

To include analysis of employment need, local poverty, disadvantage and inequality, to inform potential benefits is a departure from current practice as the annual audit of land for business and industry does not consider these issues.

An analysis of ‘employment need’ will likely cover areas outwith the control of the Local Authority to influence. In commercial terms, it will be important to try and understand the future needs of businesses in terms of location and building type and likely future trends. At the moment, logistics and distribution is in demand and is likely to become even more important.

The current city centre office stock needs support and promotion – the grade A stock is zero and the pipeline is small and the new dynamic between agglomeration and specialisation verses home working is evolving.

It also seems likely that the retail areas of the city centre are increasingly attractive for mixed/ residential redevelopment – Buchanan Galleries, St Enoch, King Street, Candleriggs, Sauchiehall Street, Collegelands. An important consideration is in encouraging the improvement of the energy performance of existing offices. Promoting a city centre residential strategy offers the best prospect of aligning market forces with providing people with proximal job opportunities.

Q27: Do you agree with the proposed guidance on the Evidence Report in relation to the section on Distinctive Places (paragraphs 297 – 310)? Yes / No / No View. Please explain why you agree or disagree.

Regarding City, Town, Commercial and Local Centres -

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The Council does not fully agree with this position. For example, we do not agree that local authorities should attempt to ‘specify’ the function of individual commercial centres. However, we agree that a broader mix of uses will be appropriate in future city centres in the future to maintain vitality and create economic resilience.

The LDP should include commentary on the role and key characteristics of important centres and place them in a complementary city-wide context/ spatial strategy. Opportunities for key centres and how they can change/ diversify (and why) or not, should be highlighted.

The changing role and character of the city centre should be highlighted, and reference made to more detailed Spatial Supplementary Guidance, including a review of the city centre commercial core to look at changing future retail needs and growing multifunctionality of the city centre.

The review should include a review of what applications have been refused in the city centre and why. It is recognised that it is difficult to bring certain uses, like a school, into the city centre because of land values and aspirational land values, it is important to maintain flexibility and avoid being too prescriptive. We are wary about specifically noting types of uses, as there may be many the LDP could note, that we want to see a variety of uses appropriate to the particular centre as long as provided in a form that is appropriate to the context. For example, leisure uses could be accommodated in a way that contributes to the city centre’s attractiveness/ vitality with proposals for new edge of centre units that pulls footfall away from core, being resisted.

Regarding town centre living, we generally agree there is scope for increased residential developments to be encouraged and supported and the local authority in seeking to provide a proportion of housing land in city and town centres, must facilitate supporting facilities.

Careful reallocation of land as vertical mixed uses will be a part of the future picture, especially residential development on upper floors contributing to mixed use schemes. LDPs could highlight key opportunities and specify that a mix of tenures and types are provided appropriate to creation of sustainable neighbourhoods.

Continued policy focus on the quality of residential development in centres (including internal space standards catering for different needs of population) and stewardship regimes to ensure ongoing good maintenance/ place management is required.

Q28: Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Sustainable Places (paragraphs 317 – 328)? Yes / No / No View. Please explain why you agree or disagree.

We do not fully agree with this position. For example, unlike SPP which introduced a presumption in favour of sustainable development, which could be tested in principle against a set of policy objectives (SPP para.29), guidance does not define what now constitutes sustainable development.

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The citing of various high level, general, non-planning related goals provides limited linkage between decision making and definable, measurable planning outcomes. It is not clear how the decision maker should identify material considerations and how much weight is to be attached to them against this new set of non-aligned goals?

When considered alongside para 10 of guidance the statement that *‘the cross-cutting nature of development planning means it contributes to all outcomes’*, there is a risk this could be construed as a diminution in the weight attached to cumulative impacts. Furthermore, if all development contributes to sustainable development but may not meet the requirements of climate emergency or nature crisis, which takes precedence?

We would welcome guidance which includes a definition of sustainable development. For example, sustainable development should take in social and economic sustainability considerations as well as environmental, albeit environ may have added weight due to climate emergency weighting. Social sustainability should recognise the need to address poor physical and mental health and health inequalities, poverty considerations. The original Brundtland Commission definition of sustainable development was *“development that meets the needs of the present without compromising the ability of future generations to meet their own needs”*. The Council recognises that unless we tackle climate change and the nature crisis, the needs of future generations cannot be met to the extent that life itself may be compromised/ extinguished.

Para 319 states that the plan’s Spatial Strategy should respond to strategic land use tensions, recognising the need for significant difficult decisions being made. The Spatial Strategy is to be based on an understanding of the emissions that are likely to be generated by the proposals of the plan and must seek to minimise new greenhouse gas emissions and maximise emissions reduction. As such, we would welcome further acknowledgement of the upskilling and resourcing implications in delivering this new requirement and provision of detailed guidance on a nationally implemented methodology for calculating carbon net zero in scope, methodology and mechanisms as well as identifying mechanisms for the resourcing of this new development plan function.

The above comments apply equally to guidance requirements to ‘take into account long term future climate risks and identify areas where development is unlikely to be supported due to the predicted effects of climate change, factoring in the need for flexibility to allow for uncertainty’.

As above, we would welcome greater acknowledge of the new skills and resources required to effectively address and taking account of long-term future climate risks and the need to identify mechanisms for the resourcing of this new development plan function including the maintenance of up-to-date flooding maps, heat mapping etc.

It would be helpful if the guidance extended to who/ what must ‘take into account’ for this requirement? And the spatial scales/ thresholds to be

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considered - Individual developments? Development Management? Plans? The NPF?

It is acknowledged that the draft NPF 4 does not currently indicate which organisations/ actors to which this aspiration applies in terms of the national spatial strategy. In addition to flooding, a developing range of impacts will likely need to be considered e.g. wind power, solar power, sequestration etc. Without a shared (measurable) understanding of what 'long term future climate risks' means, this requirement is likely unrealisable.

The Council recognises that the perceived risk to net zero implementation are lack of clear targets; performance gap between design and delivery; lack of verification; lack of clear assessment criteria; lack of process for recording and tracking against a baseline; the need for training, and new zero carbon appraisal. The key to designing for zero carbon is all about the details; holding people to account if they are not meeting the criteria and targets; and better measurement for tracking and progress. To achieve net zero will necessitate a review of our planning law; and a fundamental shift from policy to regulatory disclosure with mandatory targets to keep 1.5 alive. The Council would welcome the opportunity to work with the Scottish Government to help develop more metrics to support this agenda.

Q29: Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Liveable Places (paragraphs 329 – 400)? Yes / No / No View. Please explain why you agree or disagree.

Please see response to Question 17

Q30: Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Productive Places (paragraphs 401 – 424)? Yes / No / No View. Please explain why you agree or disagree.

Please see response to Question 26

Q31: Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Distinctive Places (paragraphs 425 – 466)? Yes / No / No View. Please explain why you agree or disagree.

Please see response to Question 27

Q32: Do you agree with the proposed thematic guidance on the Delivery Programme (paragraphs 467 – 482)? Yes / No / No View. Please explain why you agree or disagree.

The Council does not fully agree with this position, *with regards the Delivery Programme, where developer contributions are sought, details of the contribution mechanism being used should be provided; and how development viability has been factored into the funding approach.*

This places a new emphasis on contributions. We would welcome greater acknowledgement of the upskilling and resourcing implications in delivering this new requirement and the provision of detailed guidance on a nationally

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implemented methodology for calculating infrastructure need in terms of scope, methodology and mechanisms and identifying/ costing infrastructure needs of development plans?

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