
Report To: Environment and Regeneration Committee Date: 5 September 2013

**Report By: Corporate Director, Environment,
Regeneration and Resources**

**Report No:
E&R/09/13/03/sj/fm**

**Contact Officer: F J Macleod, Planning Policy and
Property Manager**

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**Subject: Scottish Government consultations on National Planning Framework 3:
Main Issues Report and Scottish Planning Policy (Consultation Draft)**

1.0 PURPOSE

1.1 To inform Committee of the publication of the Scottish Government's National Planning Framework 3: Main Issues Report and its consultation on Scottish Planning Policy. The deadline for responses to these two documents was 23rd July 2013, and the Committee is asked to endorse the response outlined in this report and the accompanying annexes.

2.0 SUMMARY

2.1 On 30th April 2013, the Scottish Government published for public consultation, the Main Issues Report for Scotland's third National Planning Framework (NPF3) and a draft Scottish Planning Policy (SPP).

2.2 When finalised, these documents will be important parts of the Scottish planning system, having implications for the way Inverclyde develops, potentially informing the finalisation of the new Local Development Plan, but particularly the next review, and on how decisions on planning applications are made.

2.3 The response to both the NPF3 and draft SPP is aligned with the response prepared by the GCV SDPA on behalf of the eight city region authorities, with additional representations made in relation to matters of particular relevance to Inverclyde.

2.4 Of the two documents, the SPP will have the most influence upon Inverclyde planning, and it is in this regard that the response in attached Annex 3 aims to influence the final version of the SPP.

2.5 The response focuses on a number of concerns, including town centres and the natural environment however, the main ones are in the section of the Draft SPP entitled, 'Buildings – Enabling Delivery of New Homes'. An additional appendix on these matters to the GCV SDPA response (Annex 2) reflects well the concerns this Council has of the draft SPP and this is supplemented further in our aligned response in Annex 3.

3.0 RECOMMENDATIONS

3.1 That Committee endorse the response outlined in this report to the National Planning Framework 3: Main Issues Report and the consultation draft Scottish Planning Policy, and delegate to the Head of Regeneration and Planning to inform the Scottish Government of this Council's approval of the officer-level submission made to it in July.

**Aubrey Fawcett, Corporate Director
Environment, Regeneration and Resources**

4.0 BACKGROUND

- 4.1 On 30th April 2013, the Scottish Government published for public consultation, the Main Issues Report for Scotland's third National Planning Framework (NPF3) and a draft Scottish Planning Policy (SPP). The first NPF was published in 2004, the second in 2009. This is the first one that has been preceded by a Main Issues Report, in similar fashion to the Development Plan procedures, prior to the finalisation of the NPF. However, unlike the development plans, this MIR does not set out reasonable alternative options: these are included in the accompanying Strategic Environmental Assessment (SEA), which also supports the draft SPP.
- 4.2 Both documents are expected to be finalised before the end of the year, the NPF to be published for 60 days Parliamentary scrutiny, and the final publication expected in June 2014. These documents will be important parts of the Scottish planning system, having implications for the way Inverclyde develops, potentially informing the Reporters' deliberations at the anticipated Examination on the Inverclyde Local Development Plan: Proposed Plan at the end of the year and in particular, the next review of this Plan. They will also inform how decisions on planning applications are made.
- 4.3 The NPF3 MIR sets the context for development planning in Scotland for the next 20-30 years and acts as the spatial framework for the Government's economic strategy objectives. It is a statutory document that sets out where nationally important developments should take place, of which there are 14, 7 of which relate to the Glasgow and the Clyde Valley SDPA area. Its primary focus is on four priorities for Scotland:
- (i) **A Low Carbon Place** – development of infrastructure to enable transition to a low carbon economy;
 - (ii) **A Natural Place to Invest** – emphasising the importance and role of environmental protection, tourism and sustainable resource management;
 - (iii) **A Successful, Sustainable Place** – with a focus on sustainable economic growth, sustainable settlements, regeneration priorities, green networks, health and new housing in the right places; and
 - (iv) **A Connected Place** – reducing the need to travel, the role of cities, transport to support economic investment, connecting rural areas, national and international connections (rail, road, ports and airports and digital links).

Refer to
Annex 1

The final section outlines six '*Areas of Coordinated Action*', the area covering the Glasgow city region, including Inverclyde, being Area 5 entitled '*Firth of Clyde*'.

- 4.4 The purpose of the SPP review is to update planning policy. Its primary focus, like NPF3 is on sustainable economic growth in the light of the economic challenges still facing Scotland. It specifically states that economic considerations are to be given 'significant weight' in decision making on planning issues. This is a change in emphasis from 'sustainable development' which is currently the pre-eminent objective running through Scottish Government planning policy and other government policy agendas. At a local level, there is an expectation that SPP will be an important means to deliver Single Outcome Agreements (SOAs) and that greater integration is encouraged between development plans and Community Planning Partnerships.
- 4.5 The purpose of SPP is to promote consistency of application of policy across the country, whilst allowing sufficient flexibility to reflect local circumstances. The SPP is a non-statutory statement of Scottish Government policy on how nationally important land use planning matters should be addressed. As a statement of Ministers' priorities it is a material consideration in the planning system that carries significant weight.
- 4.6 The draft SPP has intentionally been published in parallel with NPF3, to demonstrate the linkages and to clearly state the connections to be made between where development should happen (NPF3) and how it will be delivered (the SPP). The intention is for an improved, up to date and robust national plan as the basis for the next round of development plans and as a basis for enabling development in the right place.

- 4.7 The response to the two documents is outlined in the Attachments to this report, in Annexes 2 and 3. A number of additional observations are outlined below in relation to the NPF3 Main Issues Report. As with all recent Scottish Government consultation documents, responses are encouraged around a series of set questions. Given the response to NPF3 already prepared by the GCV SDPA on behalf of the eight city region authorities, this response does not answer all 16 questions nor duplicate the issues raised in that report but rather focuses on a number of particular issues of greater relevance to Inverclyde. The response to draft SPP similarly aligns with the GCV SDPA response, but again not all 29 questions are relevant to our circumstances. In addition, other observations are made with a view to improving the final version and to assist clarity of purpose, particularly in relation to Housing issues.
- Annex 2
Annex 3

5.0 PROPOSALS

Scotland's NPF3: Main Issues Report and Draft Framework

- 5.1 The first observation to make on NPF3 is that the four policy themes (refer para 4.3 above) are very similar to those included in the approved Glasgow and the Clyde Valley Strategic Development Plan (May 2012), and therefore provides a sound basis for the review of this Plan, currently getting underway. Annex 1 includes the seven National Developments that relate directly to the SDP area.
- 5.2 The second is to welcome the 'Firth of Clyde' as one of six '*Areas of Coordinated Action*', however certain elements of focus included in this Area are inadequately covered, including Glasgow International Airport. From the Inverclyde perspective, the 'Area' focus supports the importance of the Clyde Waterfront, the continued emphasis and recognition of the need for the transformation of the 'place', of regeneration and improved green infrastructure, and the reduction of vacant and derelict land. Addressing the impact of the economic downturn on the urban environment is emphasised too and supporting investment in the key growth sectors of renewable energy, biosciences, the creative industries, tourism and recreation.
- Refer to
Annex 2
- 5.3 There are only three specific mentions of Inverclyde in the document. The first under '*A Low Carbon Place*', Inverclyde is noted as a potential port site to support the offshore wind turbine sector, under the National Renewables Infrastructure Plan (NRIP). In the 'Area' section, reference is made to (i) the roll-out of the £430 million investment over 16 years in new electric class trains for Ayrshire/Inverclyde, to address overcrowding in and around Glasgow (already well underway); and (ii) Riverside Inverclyde URC is mentioned in its capacity to create local employment opportunities as well as improving the quality of the local environment; and in relation to working with stakeholders to support key sectors which utilise local assets such as the waterfront, includes reference to the land available for the aforementioned renewable energy sector.
- 5.4 Commenting on the above, while it is welcome that the GCV SDP, its Spatial Development Strategy and Spatial Frameworks are supported and taken a stage further in NPF3, in relation to our own situation it is disappointing to note that recognition is not given to the limited time that is left of the main implementing agency's 10 year designation, Riverside Inverclyde URC, and the clear need for a similar special regeneration agency or the local authority, to have continued levels of funding beyond the immediate period. This seems a curious omission for a 15-20 year Plan.
- 5.5 As in previous NPF documents, there is little recognition given to the role and purpose of regional parks. Regional parks should be accorded higher status in NPF3 (and the finalised SPP) in recognition of the importance of their designations for the purpose of safeguarding these areas as significant environmental resources and landscapes for informal recreation, and the contribution they make to health and wellbeing. Regional parks cut across local and strategic authority boundaries and their importance extends beyond the local or regional area.
- 5.6 On a more general level, NPF3 like its predecessors, NPF1 and NPF2, has nothing to say on the important demographic backdrop against which all development plans must

be prepared. As a context for the 'Area' sections, a sub national (regional) population and household change context is surely essential in a national plan. (Note: Inverclyde is identified as the only area in Scotland expected to experience a decline in the number of households.)

- 5.7 Another omission which should be introduced for the final version of NPF3 is a sense of priorities across Scotland as a whole. In particular, the relative weight to be accorded to the necessary investments to implement the key infrastructure projects in each of the very different Areas of focus needs to be more explicit. In this regard, there needs to be a much closer alignment with other investment strategies and policy frameworks – National Transport Strategy and the Zero Waste Plan to name but two - and a clear statement of where public sector investment will still have a greater role to play in the co-ordinated action referred to throughout the Plan.
- 5.8 NPF3 should be clearer in its outline of the very different issues being faced in the different parts of the country, particularly in the areas highlighted for co-ordinated action. There needs to be a greater recognition of the scale and nature of the problems and challenges faced in the different city regions and rural areas, issues which require a different scale and consistency of policy response and implementation, especially in the current and foreseeable financial and resource stretched economic climate.
- 5.9 The potential of the Glasgow city region to contribute to Scotland's sustainable economic future needs to be given greater prominence in NPF3, not only in acknowledgement of its size in relation to the national economy, but in order to continue to tackle what are longstanding and seemingly quite intractable problems of multiple deprivation and environmental blight across much of the region.

Scottish Planning Policy: Consultation Draft

- 5.10 This response has as its main focus the subject policy 'Buildings' and in particular the section on 'Enabling Delivery of New Homes'. Because of the number of concerns raised in relation to this part of the draft SPP, the GCV SDPA has presented an additional appendix to its response to the questions posed, due mainly to the interrelationships between the issues raised and the need for considerable redrafting in the final document (refer Annex 2). Further more detailed answers to questions 6 to 11 posed in this part of draft SPP are outlined in our response in Annex 3.
- 5.11 It is important to note that the detailed response to the 'housing issues' raised in draft SPP are made in advance of the expected publication of revised HNDA and LHS Guidance from the Scottish Government. It is possible that some of the issues raised will be addressed in these documents however it is through this consultation that the opportunity is presented to inform the drafting of these publications, and the final SPP.
- 5.12 An important issue is the need for greater clarity in relation to the planning for housing. This applies not only to the different and somewhat confusing use of terminology and key terms, but also the requirement for firm and workable guidance on the alignment and sequencing of necessary tasks in relation to the HNDA and its role in providing the primary evidence base for future housing provision for SDPs, LHSs and LDPs.
- 5.13 A number of other important issues are raised in the GCV SDPA and amplified by our own response in relation to town centre policy, green infrastructure and to the renewable energy agenda, under the section headed 'Delivering Heat and Electricity'.
- 5.14 An outstanding issue that requires clarification in the final SPP concerns the status of green belts. In paragraph 49 it states clearly 'Where necessary, the development plan may designate a green belt to support the spatial strategy' followed by the reasons for doing so and the types and scales of development which would be appropriate within the green belt. However, at paragraph 52, it states 'For most settlements a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations.'

**Refer to
Annex 3**

6.0 IMPLICATIONS

6.1 **Legal:** there are none arising directly from this report.

6.2 **Finance:** there are none arising directly from this report.

Financial implications – one-off costs

Cost Centre	Budget Heading	Budget Year	Proposed Spend this Report	Virement From	Other Comments
n/a	n/a	n/a	n/a	n/a	n/a

Financial implications – annually recurring costs/(savings)

Cost Centre	Budget Heading	Budget Year	Proposed Spend this Report	Virement From	Other Comments
n/a	n/a	n/a	n/a	n/a	n/a

6.3 **Personnel:** there are none arising directly from this report.

6.4 **Equalities and diversity:** the Council's Equalities Policy has been taken fully into account in consideration of the issues arising for Regeneration and Planning from the two Scottish Government's consultation documents.

6.5 **Repopulation:** the response has had the SOA Repopulation Outcome Delivery Group's objectives and evolving Actions Plans at the forefront in considering the potential implications for Inverclyde of the Scottish Government's update of its National Planning Framework and review of planning policy.

7.0 CONSULTATION

7.1 **Chief Financial Officer:** no requirement to comment.

7.2 **Head of Legal and Democratic Services:** no requirement to comment.

7.3 **Head of Organisational Development, Human Resources and Communications:** no requirement to comment.

8.0 CONCLUSIONS

8.1 Overall, the NPF Main Issues Report and draft SPP are welcomed, in particular the improved layouts, their outline of contents and in the SPP, the cross-referencing to 'Key Documents'. The sections on 'Core Values' 'Outcomes' and the 'Principal Policies' in the draft SPP are also helpful, as are the use of graphics in the NPF. The latter are welcomed, although there are a number of legibility issues with some of the maps due to inadequate scaling, which will have to be addressed in the final version.

8.2 A number of other observations have been made on the draft SPP. It has been noted under a number of subject areas that additional responsibilities are being placed on local authorities at a time of staff cuts, for example on town centre health checks and under the BID initiative. It is suggested that a number of these tasks should be more appropriately seen as corporate and that a considerable burden is being placed on Planning when the benefits to be had from a great deal of this survey work has wider relevance, including beyond local authorities and with other stakeholders in the system.

8.3 Finally, a great deal of background information that was helpful not only for planners but also for stakeholders in the system and the general public has been removed. The

former NPPGs and SPPs, and indeed the current SPP were of value to the non specialist as well as professional planners and related disciplines. This raises the question: who is the SPP aimed at and should this be a consideration for the final version of SPP?

9.0 BACKGROUND PAPERS

ATTACHMENT

Annex 1

National Developments within the Glasgow and the Clyde Valley SDPA Area

- 1) National Cycling and Walking Network – this supports ‘A Natural Place to Invest’
- 2) Metropolitan Glasgow Strategic Drainage Plan – supports ‘A Natural Place to Invest’
- 3) Central Scotland Green Network – supports ‘A Natural Place to Invest’
- 4) Ravenscraig, North Lanarkshire – supports ‘A Successful, Sustainable Place’
- 5) High Speed Rail – supports ‘A Connected Place’
- 6) Glasgow International Airport Enhancement – supports ‘A Connected Place’
- 7) Grid Infrastructure Enhancements – supports ‘A Low Carbon Place’

Annex 2

Glasgow and the Clyde Valley SDPA Response to NPF3 Main Issues Report and Scottish Planning Policy – Consultation Draft

Annex 3

Inverclyde Council response to NPF3 Main Issues Report and Scottish Planning Policy – Consultation Draft

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Glasgow and the Clyde Valley Strategic Development Planning Authority

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Tait

Forename

Stuart

2. Postal Address

Lower Ground Floor

125 West Regent Street

Glasgow

Postcode G2 2SA

Phone 0141 229 7733

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

- (a)** Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b)** Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c)** The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?

Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

The GCVSDPA supports the NPF's aspirations with regard to decarbonisation of the heat sector but recognises that there needs to be a balance to support sustainable economic growth. The consideration of such a balance should lie with local authorities.

2. How should we provide spatial guidance for onshore wind?

Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government's proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

Is spatial guidance for onshore wind best left to local authorities?

The GCVSDPA agrees with the proposal to use SNH's mapping, however, NPF should recognise that detailed spatial guidance is more appropriately dealt with by local authorities.

The GCVSDPA considers the identification and safeguarding of areas of potential for further large scale development should be a matter for local planning authorities to consider working collaboratively where appropriate.

3. How can onshore planning best support aspirations for offshore renewable energy?

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

The GCVSDPA considers NPF3 should include onshore infrastructure requirements related to offshore wind developments as a national development.

4. How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

The GCVSDPA has no observations to make.

5. What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?

The GCVSDPA considers NPF3 should update the suite of grid enhancements. The scale and readability of Map 5 is questionable in terms of its usefulness.

The GCVSDPA considers that in terms of energy storage capacity NPF3 provides the appropriate level of support recognising that over time locational priorities will emerge in support of the emerging technologies. NPF4 may seek to be more locationally specific on this issue.

6. Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

Where NRIP sites are proposed the GCVSDPA considers that NPF3 should set out any potential related consenting issues or associated infrastructure requirements either in NPF3 itself or as part of its Action Programme.

A NATURAL PLACE TO INVEST

7. Can NPF3 do more to support sustainable use of our environmental assets?

Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

NPF 3 Main Issues Report: Consultation Questionnaire

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

The GCVSDPA considers that NPF3 should propose specific actions in relation to meeting climate change targets recognising the importance of peatland and habitat restoration in terms of climate change adaptation.

A National Ecological Network is supported in principle however it should be recognised that there is currently a proliferation of initiatives, strategies and partnerships currently working in this subject area. The relationship between the Scottish Biodiversity Strategy and any National Ecological Network remains unclear.

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

The GCVSDPA considers that the NPF should acknowledge that there are other locations in addition to the Firth of Forth where there are opportunities for significant habitat enhancement.

9. Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

Scotland's national tourism assets are many and varied, both in scale and distribution, and their identification and future role in supporting the national economy is more appropriately left with the 'Tourism Development Plan (TDP) for Scotland' currently being developed by Visit Scotland.

NPF3 should then, on the basis of the TDP, set out which tourism land use projects/developments the Scottish Government consider to be of national importance in support of economic growth.

10. Can NPF3 do more to support sustainable resource management?

Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

The approach to waste as set out in NPF3, particularly in the context of changing technology, whilst not necessarily being in the spirit of a plan-led approach is considered to be a pragmatic and proportionate response.

Yes, the GCVSDPA considers the Metropolitan Glasgow Strategic Development Plan should be retained as a national development in NPF3 for four reasons:

- Firstly to recognise the national scale and importance of the issue it is attempting to address;
- Secondly the long term commitment required to secure its delivery;
- Thirdly as it is an exemplar of the approach to sustainable catchment management; and
- Fourthly its contribution to the delivery of the Central Scotland Green Network.

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

NPF3 should recognise the important role city regions have to play in supporting the key growth sectors and that within each of these areas each city

regions has its own particular strengths and opportunities to support particular sectors.

The GCVSDPA considers that Ravenscraig should be designated as a national development for a number of reasons:

- to recognise the scale of the challenge and long-term focus required to secure the regeneration of over 250ha of brownfield land;
- the need for a new town centre and related facilities; and
- the opportunity to support the delivery of the Central Scotland Green Network.

The future of individual cities and town centres and how they respond to the long-term trends is best left to individual local authorities working in partnership with the private sector and other public bodies. However, it is considered NPF3 should set out a clearer and stronger framework of where it anticipates significant land use change as a result of those trends.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

The GCVSDPA considers the Central Scotland Green Network (CSGN) should be designated as a national development to reflect the scale of the opportunity, its geographical cross boundary coverage and its ability to support the Scottish Government's three stated outcomes for planning.

Top priorities should be vacant and derelict land; support for green network businesses and related employment and training opportunities; woodland creation and urban greening; greenspace for health and well-being including active travel; community growing; and integrated habitat networks.

The GCVSDPA considers there is a need for all infrastructure projects in Central Scotland to consider the opportunities for supporting delivery of the CSGN. How these linkages can be made should feature as part of the current Gateway Review of the CSGN and through specific supporting statements in NPF3.

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

The GCVSDPA considers that NPF3 should reflect the results of the 2011 Census which are considerably different in some authorities to the 2011 Mid-Year population and household estimates.

NPF should give clear direction on what the Scottish Government considers the spatial implications should be in response to the issues of an ageing population and reducing household size.

NPF3 should more explicitly recognise the key role housing has to play with regard to regeneration by setting out a more definitive long-term context for housing. The regeneration agenda is of particular importance to the Glasgow and the Clyde Valley area and should be highlighted in NPF3. There is no reference to the GCV area in paragraph 4.41. The issues of effectiveness can be particularly acute in areas whose spatial strategies are based on a regeneration agenda.

Paragraphs 4.42, 4.44, 4.45 and 4.46 simply set out current funding programmes and initiatives in support of housing rather than the Government's long term aspirations for housing which could perhaps reflect the previous direction set out in 2007 through 'Firm Foundations'.

The NPF's recognition of the importance of supporting those housing locations which support the delivery of a low carbon economy is welcomed but perhaps could be strengthened by recognising that housing development in non sustainable locations will impact on many of the Scottish Government's stated outcomes particularly with regard to regeneration.

The GCVSDPA supports the NPF3 proposal not to set regional targets as it considers these are more appropriately informed at the regional level.

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

The GCVSDPA considers that NPF3's emerging strategy is consistent with the aim of decarbonising transport but should go further in promoting walking and cycling not only as part of a 'connected place' but also as an integral part of placemaking. In addition a revised National Transport Strategy should be considered as a priority to support the revised land use strategy set out in NPF3.

In terms of objectives for digital infrastructure the GCVSDPA considers these should include priority support for cities and their rural hinterland in recognition of their importance to delivering sustainable economic growth.

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

The GCVSDPA considers that in terms of improvements to the physical and digital connections to rural areas, priority should be given to those rural areas within the four SDP area as a means of supporting the wider economic role of the city regions.

16. How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?

Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

In terms of freight, NPF3 should set out the projected levels of freight movements by mode and whilst the support for ports is welcomed, it is considered that there is merit in NPF3 identifying the nationally important road and rail freight hubs.

The GCVSDPA supports the NPF's aspirations for airports. However, in relation to Glasgow Airport it should recognise the related 'Glasgow International Airport Zone Strategic Economic Investment Location (SEIL)', as set out in the recently approved SDP, rather than just the area covered by the airport masterplan as the SEIL areas will support the airport to deliver its economic potential.

The GCVSDPA considers that given the NPF is intended to set out the long term spatial strategy for Scotland, it is entirely appropriate that HSR be retained

as a national development and that this should be expanded to include a high speed rail line between Glasgow and Edinburgh.

Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?
2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?
3. Taking into account the environmental effects set out in the report, what are your views on:
 - a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
 - b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
 - c) The proposed suite of national developments to be included in the Proposed Framework?

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- d) Alternative candidate national developments?
 - e) The policies proposed for the Draft SPP?
 - f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?
 5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?
 6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

1. The GCVSDPA considers the SEA adequately covers the environmental baseline for a strategic level document with the level of detail considered both appropriate and proportionate.

2. The GCVSDPA agrees with the assessment findings and does not consider there are other strategic environmental effects arising from the MIR and Draft SPP which have not been detailed in the SEA.

3. (a - f) refer to answers relating specifically to NPF3 and SPP.

4. The most significant negative effects arising from the assessment that should be taken into account when finalising NPF3 and SPP are:

- potential impacts arising from (onshore) infrastructure required to support off shore renewable energy and the National Renewables Infrastructure Plan; and
- the on-going negative impact of woodland removal for renewable energy projects on national planting targets.

5. NPF and SPP could be further enhanced by taking more account of climate change adaptation e.g. identify the actions that land use planning can take in relation to rising sea levels and anticipated changes in weather patterns.

6. The GCVSDPA welcomes the pragmatic approach to mitigation and monitoring in Section 6 of the Environment Report. This section is found to contain information that is both proportional and appropriate to the strategic nature of NPF and SPP.

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

The GCVSDPA has no observations to make.

Business and Regulatory Impact Assessment (BRIA)

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

The GCVSDPA has no observations to make.

SEE ATTACHED APPENDIX FOR ADDITIONAL COMMENTS FROM GCVSDPA.

APPENDIX - NPF3 MIR Consultation Response

Glasgow and the Clyde Valley Strategic Development Planning Authority

Other observations

- **Heads of Planning** - The GCVSDPA would endorse the response from Heads of Planning Scotland particularly around the need for NPF3 to set out clearly out the long term ambition and vision for Scotland and the need for the provision of a stronger evidence base including new research which can support the delivery of SDPs and LDPs.
- **'Areas of Co-ordinated Action'** - With regard to the 'Areas of Co-ordinated Action' the term 'Firth of Clyde' is not used often to reflect our area either by ourselves as the SDPA, the Green Network Partnership or by the joint Community Planning Partnership. 'Glasgow and Clyde Valley' is suggested as more appropriate terminology.
- **Role of GCV City region** - Whilst the role and contribution of cities and their wider city regions is acknowledged in the document, the approach to the cities could be significantly strengthened in terms of their potential to meet the Scottish Government's outcomes for planning namely improving the quality of life and place, enhancing the natural environment and supporting economic growth and the translation to a low carbon economy.

It should also be recognised that the areas identified for co-ordinated action are very different in respect of the issues they face and their ability to respond to the current economic conditions and as such NPF3 should set out which are the priority areas for public sector investment.

The GCVSDPA considers that the challenges it faces are of a significantly different scale to those elsewhere in the country especially in relation to vacant and derelict land, health and placemaking.

Given its size (a third of Scotland's population), its contribution to Scotland's GVA (a third of Scotland GVA) and the scale of the issues and challenges it faces, with appropriate prioritisation of resources, this region can make an increased and significant contribution to the Scottish Government's planning outcomes through:

- the reuse of the highest levels of vacant and derelict land in Scotland (GCV 43% of Scotland's total);
- delivery of a significant part of the Central Scotland Green Network;
- investment in GCV's Strategic Economic Investment Locations, which will support the Scottish Government's key economic sectors namely renewable energy, financial and business services, biosciences, the creative industries, tourism and recreation;
- the delivery of three of Scotland priority regeneration priority areas, Clyde Gateway, Clyde Waterfront, and Ravenscraig with resulting social, economic, environmental and health benefits for many of Scotland's most deprived communities as identified in the Scottish Index of Multiple Deprivation;
- investment in Glasgow City Centre as Scotland's most important retail centre, with a significant conference and tourism offer.

Consequently the opportunity to make a significant contribution to the Scottish Government's planning outcomes is significant in this area. This opportunity is

understated in the current NPF3 and as such the GCV area should have greater priority assigned to it in the final NPF3. The scale of the vacant and derelict land issue /opportunity in GCV city region is significant. GCV has 43% of Scotland vacant and derelict land and taking average GCV annual take up rates since 1996 it would take over 30 years to remove the current levels (3243ha) of urban vacant and derelict land from the Strategic Development Plan area. Addressing this issue should be identified as a national planning spatial priority and appropriate resources assigned.

- **Development Risks** - Given the current economic difficulties and the impacts on the development industry it should be acknowledged that there are potential risks to the delivery of both the NPF3 and the approved GCV SDP's 'Sustainable Development Strategy' through the short term development of less sustainable locations in advance of the preferred regeneration priorities within the GCV city region.

Draft Scottish Planning Policy : Consultation Questionnaire

RESPONDENT INFORMATION FORM

This is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Glasgow and the Clyde Valley Strategic Development Planning Authority

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Tait

Forename

Stuart

2. Postal Address

Lower Ground Floor

125 West Regent Street

Glasgow

Postcode G2 2SA

Phone 0141 229 7733

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

PRINCIPAL POLICIES

- | 1 | Sustainable Economic Growth | Y | N |
|---|---|----------|--------------------------|
| | Do you think that the measures outlined in paragraphs 15 to 23 are appropriate to ensure that the planning system supports economic recovery and sustainable economic growth? | ✓ | <input type="checkbox"/> |
| | Are there other measures to support sustainable economic growth that you think should be covered in the SPP? | ✓ | <input type="checkbox"/> |

The GCVSDPA considers the planning system can support economic recovery and sustainable economic growth through support for development proposals that accord with SPP, through land allocations and policy responses in Development Plans, and through the granting of planning permission for acceptable development proposals in sustainable locations through the development management process.

The GCVSDPA supports a planning system where Development Plans are up to date with preparation and development management activities undertaken in an efficient and proportionate manner in support of the Scottish Government's performance indicators. SPP should recognise that even once planning permission is granted the planning system can have little influence over when or even whether, development is delivered.

Experience and statistics reveal that even when planning permission is granted, there are remaining challenging economic and fiscal impediments that militate against development delivery. Given the current economic conditions, there is a major issue with stalled development sites to which SPP could give significantly higher priority. A practical response would be to specifically task Planning Authorities and Homes for Scotland to identify stalled developments as part of their annual Housing Land Audit process. To support this a clear definition of what constitutes a 'stalled' site is required to be set out in SPP.

In order to support economic recovery and work towards the delivery of sites that support spatial strategies, the identification of stalled development sites and appropriate responses and solutions could form an important strand of the policy response to current economic conditions. This is a particularly important agenda for the Glasgow and the Clyde Valley area to support its recently approved SDP and its sustainable development strategy.

The GCVSDPA welcomes the final sentence of paragraph 16 where the Scottish Government's aim is to achieve the right development in the right place, rather than development at any cost.

The Scottish Government central purpose of promoting sustainable economic growth and the 'positive' role that planning can play in achieving that is emphasised at paragraph 15. At paragraph 17, the planning system "should foster a business environment which is supportive to new investment across Scotland", and "attach significant weight to economic benefit".

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

The GCVSDPA considers that SPP paragraph 17 should give greater clarification as to what the Scottish Government intends by "significant weight to economic benefit of proposed development as a material consideration". Any consideration of economic benefit should be based upon net gain taking into account the effect of potential displacement.

There is little reference to the current National Transport Strategy which should be the transportation response to the land use direction of the NPF. There is considered to be merit in taking the opportunity in NPF3 to realign the two strategies with a refreshed National Transport Strategy.

2 Location of New Development – Town Centres

Do you think that local authorities should prepare town centre health checks, as set out in paragraph 55?

Y N

✓

Are there other health check indicators you think should be included in the SPP?

The GCVSDPA in general is supportive of town centre health checks, however, there are likely to be issues relating to the availability of data and resources. Much of the data itemised is potentially available however it is unlikely to be currently held in a manner readily accessible to the Local Authorities. This is not an insurmountable issue however, it will require some consideration and coordination in order to streamline this data collection and collation activity. The GCVSDPA would be happy to assist the Scottish Government in the development of guidance on this approach.

The GCVSDPA consider for this policy to be successful, an understanding of the current and future role and function of town centres is imperative. Town centre health checks and developing appropriate responses through Town Centre Strategies is fully supported. However much of the detail in SPP relating to this, deals with operational matters and could be potentially be better located in Planning Advice rather than in SPP.

In terms of related paragraph 43 2nd bullet point the term 'liveliness' is a new one and would benefit for being defined. Also in terms of the 3rd bullet point the term 'previously developed land' requires to be defined or preferably the term brownfield land should be reinstated.

3 Location of New Development – Town Centres

Do you think that local authorities should prepare town centre strategies, as set out in paragraph 56?

Y N

✓

The GCVSDPA supports the preparation of town centre strategies by local authorities recognising the need for a joined up local authority corporate

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

response. Although many local authorities will be currently engaged in some form of town centre regeneration activity, the range of actions set out at paragraph 56 may be outwith the normal sphere of activity of the planning services of local authorities. It may be useful to develop specific advice on the nature and scope of Town Centre Strategies.

4 Location of New Development – Town Centres

Y N

Do you think the town centre first policy should apply to all significant footfall generating uses and the sequential test be extended to this wider range of uses, as outlined in paragraphs 63 to 67? ✓

An alternative would be to apply the sequential test to retail and 'all' leisure development, no longer limiting leisure to 'commercial' development. Do you think this is the appropriate approach? ✓

The GCVSDPA supports the retention of the sequential approach and its application to all significant footfall generating uses as outlined in paragraphs 63 to 67 as this recognises the challenges facing town centres and the need to continue to focus a wider range of development, other than just retail, in town centre locations.

5 Location of New Development – Rural Development

Y N

Do you think the approach to spatial strategies for rural areas outlined in paragraphs 68 to 71 is the appropriate approach? ✓

The GCVSDPA welcomes the approach set out particularly in respect of paragraph 70 though the terminology of 'accessible and pressured rural areas' and 'remote rural areas' requires to be clarified.

BUILDINGS

6 Housing

Y N

Do you think explaining a 'generous' housing land supply as allowing an additional margin of 10 to 20%, as set out in paragraph 85, is the appropriate approach?

An alternative would be to state that a generosity factor should be added to the land supply, and that this may be smaller in areas where there can be confidence that the sites identified in the plan will be developed in the plan period, and larger in areas where there is less confidence in the deliverability of the land supply. Do you think this is the appropriate approach?

See Appendix

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

- | | | Y | N |
|--------------|--|--|--|
| 7 | Housing
Do you think that authorities should be able to include an allowance for windfall development in their calculations for meeting the housing land requirement, as set out in paragraph 86? | <input type="checkbox"/> | <input type="checkbox"/> |
| See Appendix | | | |
| 8 | Housing
As set out in paragraph 87, do you think strategic development plans should set out the housing supply target:
a. only for the strategic development area as a whole;
b. for the individual local authority areas;
c. for the various housing market areas that make up the strategic development plan area; or
d. a combination of the above | <input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/> |
| See Appendix | | | |
| 9 | Housing
Do you think the approach to how national parks address their housing land requirements, as set out in paragraph 90, is the appropriate approach?
An alternative would be for national park authorities to assess and meet housing requirements in full within their areas. Do you think this is the appropriate approach? | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| See Appendix | | | |
| 10 | Housing
Do you think the approach to identifying the five year effective land supply, as set out in paragraph 91, is the appropriate approach?
An alternative approach would be for the supply in strategic development plan areas to be calculated across local development plan areas. This would require strategic development plans to set out housing supply targets for each local development plan. Do you think this is the appropriate approach? | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| See Appendix | | | |
| 11 | Housing
Do you think that the level of affordable housing required as part of a housing development should generally be no more than 25%, as set out in paragraph 97? | <input type="checkbox"/> | <input type="checkbox"/> |

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

See Appendix

12 Housing

Do you think that the approach to addressing particular housing needs, as outlined in paragraphs 100 to 103, is appropriate?

Y N

See Appendix

13 Business & Employment

Do you think the regular review of marketable sites for business, as set out in paragraph 110, should take the form of 'business land audits' in order to ensure identified sites are marketable?

Y N

✓

The GCVSDPA supports the principle of preparing Business Land Audits although no detail of what the Audits are expected to cover is provided. The SPP, or related advice, should provide further detail in this regard. In particular under the glossary wording for "Marketable Sites (Business), the term, 'meet business requirements' should be clarified. The GCVSDPA undertakes an annual industry and business land survey which includes information on marketable and quality land and take up and would be happy to work with the Scottish Government to develop an approach to this issue.

A consideration for any future Business Land Audit should be the identification of stalled business land sites (see response to Question 1 with regard to comments in respect of stalled sites). In addition any National Planning Performance Indicators should align with the data requirements from any Business Land Audit.

Paragraph 108 states that Strategic Development Plans should identify clusters of industries which handle hazardous substances and safeguard them from inappropriate development. Further clarification is sought on how this should be reflected in an SDP and the added value of such an approach. It could be viewed as an unnecessary level of detail given the existing responsibilities of the Health and Safety Executive and the aspiration for 'concise and visionary' SDPs. It may be that this could be a consideration in respect of the approach to future Business Land Audits.

With regard to paragraph 106 reference is made to potential growth sectors, however, the terminology does not reflect the terminology of growth sectors set out in the Scottish Government's Economic Strategy 2013. Consistency of terminology would be welcomed.

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

NATURAL RESOURCES

- 14 Green Infrastructure** Y N
- Do you think that the provision of green infrastructure in new development should be design-led and based on the place, as set out in paragraph 163? ✓
- An alternative would be to continue with a standards based approach. Do you think this is the appropriate approach? ✓

The GCVSDPA strongly supports a design led, place based, approach to green infrastructure within new development. A standards based approach is overly prescriptive and can limit the ability to take account of local circumstances.

It is also considered that the benefits of fully integrating an approach to landscape and green infrastructure from the outset of the design process could also usefully be given emphasis within the Placemaking section of SPP (paragraph 41).

The reference at paragraph 162 stating that Local Development Plans should encourage the temporary use of unused or underused land as “green infrastructure” is supported, however it is suggested that this is widened to include “appropriate temporary uses including green infrastructure”. This would align with initiatives such as Glasgow City Council’s Stalled Spaces Project where a range of uses have been supported including for example, community arts projects.

UTILITIES

- 15 Heat & Electricity** Y N
- With reference to paragraphs 214 to 215, do you think heat networks should be developed ahead of the availability of renewable or low carbon sources of heat? ✓
- An alternative would be for heat networks to only happen where there are existing renewable and waste heat sources or networks. Do you think this is the appropriate approach?

The GCVSDPA supports the development of heat networks ahead of the availability of renewable or low carbon sources of heat. The issue of heat requires a significant shift in current thinking around the provision of heat infrastructure. Provision of this can be costly as can the provision of a renewable heat source and may impact on development viability. It is therefore preferable to proceed with non-renewable heat sources that will allow transfer to renewable heat in the future. Heat networks using non-renewable heat sources are likely to offer significant carbon savings compared to current heat provision of individual gas boilers. It therefore makes sense to allow this interim position and this is preferable to developing heat networks only where there are existing renewable

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

and waste heat sources or networks.

16 Heat & Electricity

With reference to paragraph 218 and subsequent groups, do you think that the proposed increased community separation distance of up to 2.5km is appropriate? ✓

Y

N

The community separation distance of up to 2.5km is almost arbitrary since sensitive and well designed siting within the landscape relies on many factors including topography. However, if it is stated clearly that this is a guideline for indicative spatial frameworks, the GCVSDPA believes it is appropriate to highlight the need to protect communities from undue development pressures and in this sense an indicative community separation distance of 2 or 2.5km seems reasonable. However, clarification is sought on whether this separation distance applies to all wind development or for wind farm developments of a certain scale, in which case this scale should be clearly stated.

17 Heat & Electricity

With reference to paragraphs 216 to 219, do you think the proposed approach to spatial frameworks achieves the right balance between supporting onshore wind development whilst protecting the natural environment and managing visual impacts on communities? ✓

Y

N

In theory, yes. However, in the GCV area the SDPA has had difficulty in commissioning a GCV-wide landscape capacity study to determine where wind turbine development is suitable and where cumulative impact is likely to be an issue. Producing 'robust' spatial frameworks would appear to require up-skilling in planning and possibly also in consultancies. The relative weight given to these issues should remain the duty of local authorities.

Notwithstanding the above comment, there is a need to consider the relationship between onshore and offshore wind development.

18 Heat & Electricity

Do you think the SPP could do even more than is drafted in paragraphs 222 to 224 to secure community benefits from renewable energy developments while respecting the principles of impartiality and transparency within the planning system? □ □

Y

N

The GCVSDPA has no observations.

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

- 19 Digital** **Y** **N**
Do you think the planning system should promote provision for broadband infrastructure (such as ducting and fibre) in new developments so it is designed and installed as an integral part of development, as set out in paragraph 230?

It is noted that no role has been identified for the SDP in respect of digital communication. The requirements in respect of this element of infrastructure, can be cross boundary in nature and Scottish Enterprise have previously mooted that there may be a role for SDPs in coordinating digital infrastructure provision and activity in a similar manner to the SDP's role in the Metropolitan Glasgow Strategic Drainage Partnership (MGSDP). The Scottish Government may wish to give this further consideration and the SDPA would be happy to assist.

In respect of the consultation question, specific to broadband infrastructure in new developments, in principle, this is supported. Responses from Development Management will be useful and regard will require to be given to the impacts on development viability.

- 20 Flooding & Drainage** **Y** **N**
Do you think that Strategic Flood Risk Assessment should inform the location of development, as set out in paragraph 239? ✓

The GCVSDPA supports this approach however there are related resource implications as well as training requirements in order that planning authorities can adequately protect against strategic flood risk.

- 21 Flooding & Drainage** **Y** **N**
With reference to paragraphs 245 to 247, do you think that where the Scottish Environmental Protection Agency (SEPA) has already granted a Controlled Activities Regulations (CAR) license then there should be no need for consideration of water and drainage issues by the planning system?

The GCVSDPA has no observations.

- 22 Reducing & Managing Waste** **Y** **N**
With reference to paragraphs 248 to 262, do you think that planning policy for waste management should be consolidated into the SPP to be clear on the messages and to remove the need for further narrative in Annex B of the Zero Waste Plan? ✓

The GCVSDPA considers the approach to waste, given experience to date since

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

the publication of the Zero Waste Plan in 2010, to be proportionate and pragmatic and supports the direction set.

23 Overall

Do you think the proposed new structure and tone of the draft SPP is appropriate?

Y N

✓

The GCVSDPA considers that in general the structure and tone of the document is an improvement on the current SPP and this is welcomed. In particular, the language and the use of colour coding relating to NPF3 used throughout the document is considered to be helpful.

There are a few references which could be expressed differently to reflect planning roles more appropriately and accurately.

For example paragraph 14 states that:

“This illustrates the important role of planning in promoting a more resilient and adaptable economy that creates jobs, increases productivity and enhances the environment, whilst reducing emissions, inequalities and disparity between regions.”.

It should perhaps read:

“This illustrates the important role of planning [in providing a land use strategy and policy framework that assists] in promoting a more resilient and adaptable economy that creates jobs, increases productivity and enhances the environment, whilst reducing emissions, inequalities and disparity between regions.”;

Similarly paragraph 20 states that:

“Action programmes should be actively used to deliver planned developments”,

It should perhaps read:

“Action programmes should be actively used [to assist with the delivery of] planned developments.”

The above points may seem minor, however when adopting an outcomes focused approach, it is important and useful to specify with clarity, what planning can achieve, and indeed what it cannot deliver on.

24 Overall

Do you think the SPP should and can be monitored? If so, how?

Y N

✓

The GCVSDPA considers that given the Scottish Government’s approach to outcomes and the National Performance Framework that it would be consistent, appropriate and important to monitor the implementation of SPP.

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

Indicators should directly relate to the Planning Outcomes set out on page 5 and in the interests of a proportionate approach to this matter, they should focus on land use and development delivery.

At least one key indicator (effective housing land: years supply) is already collected through the Planning Performance Framework (PPF) and this approach, (use of the PPF), should be extended to monitor the implementation of SPP.

As well as effective housing land supply, other key indicators, based on the Planning Outcomes, could include:

- a measure/measures of town centre health to align with the Town Centre Health Checks;
- a measure/measures relevant to Business Land Audits (currently the PPF measures relate to commercial floorspace and further consideration is required, including through the use of Business Land Audits, to identify more meaningful measures);
- delivery measures such as: housing units completed/business land floorspace take up and employment/green infrastructure delivered/enhanced
- an indicator relevant to the active travel agenda such as modal split for journey to work;
- an indicator relevant to the delivery of green infrastructure and/or place making.

25 Overall

Do you think the SPP could be more focused? If so, how?

Y N

✓

The GCVSDPA considers there remains some repetition and imbalance between topic areas in the Draft SPP with a mix of policy and contextual guidance, which could benefit from a revisit. For example in relation to comments on Town Centres, the policy and the approach to operational matters including the recommended Health Checks and Town Centre Strategies, could be separated out, with the latter removed to Planning Advice or similar.

26 Overall

In relation to the Equalities Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on any particular groups of people.

The GCVSDPA has no observations.

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

27 Overall

In relation to the Equalities Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

The GCVSDPA has no observations.

28 Overall

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on business.

The GCVSDPA has no observations.

29 Overall

Do you have any other comments? If so, please specify the relevant section and/or paragraph.

Delivery

The GCVSDPA supports the views expressed in the Heads of Planning response regarding the need for a fundamental consideration of the delivery issues given current economic conditions and the scale of the problem with respect to stalled and unviable or less viable development locations.

This is a particular issue for Glasgow and the west of Scotland with its legacy of brownfield land. These sites are in areas which if developed would enhance the offer of the Glasgow city region, provide employment, enhance and regenerate communities, provide sustainable development locations close to established settlements and transport links, reduce health and social inequalities and protect the development of less sustainable greenfield locations.

Delivery and development of these sites and locations would strongly accord with the policy agenda of the NPF3, GCVSDP and related LDPs in the area. The recommendation to address this through initially an approach to Stalled Development Sites Audit and Strategies, supported through funding initiatives that are commensurate to the scale of the problem is vital to deliver on policy priorities around sustainable economic development and placemaking which are the stated priorities for this SPP.

Outcomes: How Planning Makes a Difference

The embedding of an outcomes focused approach (Paras 8-14) is welcomed and the adoption of the three Planning Outcomes is supported. However, the

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

three Planning Outcomes that have been provided are worded as activities rather than as outcomes and some further consideration may require to be given to this.

The Outcome focused approach follows through the document where each Policy topic includes a section on delivery. This usually includes specific guidance on the role of the Development Plan and Development Management. This approach is supported but could in some cases go further by referencing consistently the role of Strategic Development Plans, Local Development Plans, Development Management and Developers. Additionally, further clarity is suggested around terminology used to describe the role of decision makers which will often be the Planning Authority but can include the DPEA and Scottish Government.

Further clarification or guidance on “greater integration between land use planning and community planning” referenced at paragraph 10, would be welcomed.

It is also noted that despite numerous references to health within the document, the Scottish Government National Outcome on health “we live longer healthier lives” has not been identified as a relevant National Outcome. The inclusion of a health orientated planning outcome should be considered as this is an important and relevant agenda, particularly in the west of Scotland. It is noted that health inequalities in this area, merited specific mention in the NPF3 MIR where it stated at page 72 that: “low life expectancy is a stark characteristic of the region’s most disadvantaged communities”.

‘Sustainable development’

It would be helpful if this term was clearly defined either in text at paragraph 24 or in the glossary.

Climate Change

The explicit role of Development Planning and Development Management in relation to mitigation and adaptation is not clearly described in paragraph 34 on Climate Change. Mitigation and adaptation are useful terms, but it would be more directional and outcomes focused to describe the specific responsibilities of developers, development planning and development management, in this context.

Placemaking

The emphasis given to placemaking is welcomed and supported although some further clarification on delivery and the respective roles of development planning, development management, and delivery would be welcomed.

At paragraph 37, 2nd sentence should read “following six qualities of successful places” to align with the text of the first bullet point of paragraph 38; also page 13 diagram requires a title ‘key stages of the design process’ to align with the

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

text of the first bullet point of paragraph 38; diagram at paragraph 40 requires a title 'Design Tools'.

Although the general aim of paragraph 39 and the associated diagram on page 13 are understood, this section could be given a sharper focus by documenting how the, design guidance and diagram, are to be used and by whom. Specifically, it is assumed that the guidance and diagram, are aimed at all those involved in the design process including local authorities engaged in design projects, (either as lead developers or in formulating design guidance), but primarily it is assumed to be aimed at developers. Additionally, unlike other sections of the Draft SPP, no specific guidance is provided on the role of Development Management, which in respect of design issues, plays a significant role. Textual clarification of the foregoing would assist in providing a sharper and more outcomes focused approach to the delivery of design guidance.

Relating to earlier comments in relation to Question 14 on Green Infrastructure, the benefits of fully integrating an approach to landscape and green infrastructure within the design process, and from the outset of the design concept, could usefully be given emphasis within the place making section of SPP.

In addition it would be helpful if health and well being was strongly referenced within the SPP.

Tourism

In terms of paragraph 109 the GCVSDPA recognises the important contribution of tourism and leisure developments to the Scottish and GCV economy. However, given the existing responsibilities of Visit Scotland and the new 'Tourism Development Plan for Scotland', alongside the aspiration for 'concise and visionary' SDP's, further clarification is sought on how this should be reflected in an SDP. The concern is that there may be little added value of such an approach which may require an unnecessary level of detail.

'Brownfield'

The removal of the terminology 'brownfield' and associated glossary reference is considered to be detrimental for those authorities who are predicating their spatial strategies on such an agenda.

Natural Resources

Given the cross boundary issues relating to the extraction of coal it is considered that the SDP has a role and this should be recognised.

Green Belt

In terms of the green belt it would be helpful if references to coalescence referred to in paragraph 160 of the current SPP were reintroduced in addition it would be helpful if the linkages between the role of the Green Belt and Green Networks for providing access and connectivity etc was included within this

Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

section.

APPENDIX- Draft SPP Consultation Response

Glasgow and the Clyde Valley Strategic Development Planning Authority

Buildings - Enabling Delivery of New Homes

Overview

The comments on the 'Enabling Delivery of New Homes' section are made before the revised HNDA and LHS Guidance have been published. It is possible that some of these issues will be addressed in these documents, however, in the absence of their publication the issues are raised through the consultation on Draft SPP.

It is considered that the consultation questions asked makes it difficult to respond to this section in the round therefore the main points are signposted below. Where alternative wording is suggested this text is shown in red. The flow of the housing section could be improved to better reflect the sequence of events particularly in Strategic Development Plan areas where advice is currently spread across a number of paragraphs.

There are a number of planning for housing issues arising in Draft SPP that are interrelated that will impact upon the process for SDP2:

- Alignment/Sequencing of HNDA, SDP, LHS and LDP (refer Q8 and Annex 2)
- Determining Housing Supply Targets (refer Q8 and Annex 1)
- Effectiveness of Housing Land Supply (refer Q10)
- Generosity Allowance (refer Q6 and Annex 1)
- Housing Market Areas (refer Q10)

Overall the draft SPP is welcomed, however it presents an opportunity to provide greater clarity in relation to planning for housing. It is important that SPP recognises that many of the current constraints in the housing market are related to financing development which is outwith the scope of planning.

Planning provides a balance between the interests of developers, the public and the environment amongst others and the desire to build new homes should be managed within the relevant geographic context, allowing for brownfield development and regeneration where appropriate. The omission of the term brownfield land from SPP is detrimental in this regard and should be reinstated.

HNDA Tool

It is considered that the introduction of the HNDA Tool has provided a consistent method to assess housing demand across Scotland and for authorities to build capacity to undertake their own housing need and demand assessment which is welcomed. In a strategic development planning area there are complexities in trying to align the SDP with the Local Housing Strategy process and these issues require further consideration by the Scottish Government. The relationship and timescales between the LDP and LHS are much simpler in a unitary authority, however, 19 local authorities are part of strategic development planning areas and SPP would benefit from providing clarity for SDP areas to ensure a straightforward process and desired outcomes for the second round of SDPs.

Consultation Question 6

Do you think explaining a 'generous' housing land supply as allowing an additional margin of 10 to 20%, as set out in paragraph 85, is the appropriate approach?

An alternative would be to state that a generosity factor should be added to the land supply, and that this may be smaller in areas where there can be confidence that the sites identified in the plan will be developed in the plan period, and larger in areas where there is less confidence in the deliverability of the land supply. Do you think this is the appropriate approach?

The introduction of the term generosity in SPP 2010 was generally considered unhelpful as it was not quantified so the attempt to quantify it is welcomed. It is considered that the presumption will always be to the high end of any suggested scale therefore it would be more helpful to have one value rather than a range and 10% seems an appropriate aspiration to achieve the Scottish Government's agenda to increase land availability for house building.

However, in an area like Glasgow and the Clyde Valley, regeneration is the cornerstone of development in the region and the generosity allowance and housing land allocations will be sought firstly from brownfield sites as opposed to greenfield sites. A blanket approach to the generosity allowance may not be appropriate across Scotland and the alternative approach given in question 6 is in principle an appropriate way forward, adding a generosity factor to the land supply and allowing local flexibility. It is considered that availability of land is not the main issue in the GCV area. The term generosity was introduced to planning in a buoyant housing market and it is considered that it may not be as relevant in the current market.

It is not clear in Draft SPP at what stage in the process generosity should be applied and this should be clarified in the revised SPP. We have set out in Annex 1 the GCVSDPA's preferred approach. The GCVSDPA believes that the generosity allowance should be appropriately applied to the land supply and not the Housing Supply Target. The Housing Supply Target is determined through a detailed technical exercise using the HNDA Tool and evidence based scenarios and assumptions. These results are then considered further to take account of '*wider economic, social and environmental factors including issues of capacity, resource and deliverability*' (paragraph 84). It would not be appropriate to then apply generosity to the Housing Supply Target but it could be applied to the land supply. For example if demand is for 1,000 units and supply is 1,000 units, then there would be no shortfall. However, if a 10% generosity allowance was applied to the land supply then there would be a shortfall. To achieve a 10% generosity allowance would require 1,100 units to be made available through the land supply.

It is considered inappropriate to apply a generosity allowance to the Housing Supply Target e.g. for the GCVSDPA for private sector alone in the 2011 SDP the land requirement 2009-25 was 97,000 units. 10% above this would be 9,700 units and 20% 19,400 units (this is equivalent to the 13 Community Growth Areas at the GCV scale). These are significant figures and additional land release of this scale is contrary to the regeneration agenda in the Glasgow and Clyde Valley city region in the circumstances where the land supply is considered appropriate for development. Furthermore, demand over the time period of the plan has been methodically estimated and it would be ineffective to plan for more households than are realistic as this could undermine the urban renewal strategy of the city region. There are a limited amount of newly forming households in Scotland and it is appropriate that all city regions in Scotland plan for growth that is both reasonable and sustainable. This is something which should be addressed as part of the context of National Planning Framework 3.

The alternative approach given in consultation question 6 relates to confidence in the deliverability of the land supply i.e. the effectiveness of sites. Effectiveness only relates to the minimum five year land supply as formally audited by the Local Authorities and Homes for Scotland and does not relate in any way to urban capacity sites. It is important that this distinction is made clear in the SPP to prevent misinterpretation of the term 'effectiveness'. It is considered that the local planning authority is best placed to make judgments on the longer term land supply in terms of confidence in its deliverability.

It is suggested that **paragraph 85** could read;

'Plans should set out the housing land supply and identify the number of homes to be provided through new land allocations in the plan period. This should be sufficient to accommodate the Housing Supply Target, plus a margin of 10% where appropriate, taking account of the contribution of sites in the established supply that are effective, or capable of becoming effective within the plan period.'

In meeting the housing requirement including generosity allowance, SPP could usefully comment on the role of higher density developments which within settlements, can contribute to multiple policy objectives including the maximisation of the use of development land in sustainable locations and the reduction of the need to utilise green field sites in less sustainable locations. These objectives and specific reference to the role of higher densities aligns with the general policy context of SPP, as well as the NPF MIR which includes numerous specific references to the role of higher density development.

Annex 1 - Housing Supply Targets and Housing Requirement Process



Consultation Question 7

Do you think that authorities should be able to include an allowance for windfall development in their calculations for meeting the housing land requirement, as set out in paragraph 86?

In the GCV city region an allowance for windfall has never been counted towards future supply. This has historically been considered to add flexibility to the process. For each plan the housing land audit and urban capacity study, assess future supply and form the basis of a comparison of supply and demand. Additional development comes forward in two ways: small sites (less than 4 units are not counted in the housing land audit) or windfall sites that by their very nature are unexpected.

Measuring the number of windfall sites can be challenging, particularly in larger authorities as a comparison between the housing land audit, urban capacity study and planning applications is required. In the GCV area it would be the preferred approach to continue to use windfall as an element of flexibility, however, the terminology flexibility has been removed from Draft SPP. We would welcome the reintroduction of the term flexibility. It is also considered that windfall completions can be inconsistent in some authorities which makes it challenging to incorporate an assumption made on past completions.

The wording of [paragraph 86](#) is considered confusing *'Any assessment of the contribution to the Housing Supply Target which may be expected to be provided by windfall sites should be informed by an urban capacity study or clear evidence from past completions.'* An urban capacity study does not identify windfall sites as these are by definition unplanned development. This sentence should be removed or the meaning clarified. It also contradicts the definition of windfall given in the Glossary on page 66, which is correct. Windfall should also be cross referenced to [paragraph 47](#).

Reference is made to urban capacity studies in [paragraph 47](#) as part of developing spatial strategies however an explanation of the role of such studies, as set out in the current SPP paragraph 81, is missing from the Draft SPP and should be reinstated. Additionally, the role of such studies in anticipating additional land that may come forward within key development plan time periods, particularly for Strategic Planning purposes, could usefully be explicitly stated.

It is suggested that [paragraph 47](#) could also include (extract from paragraph 81 in SPP 2010);

'Urban capacity studies assess opportunities for further housing development within existing settlements, focusing on previously developed land and conversion of existing buildings, and reviewing land currently allocated for uses other than housing. Planning authorities are encouraged to use urban capacity studies to inform the settlement strategy. Where possible, planning authorities should involve the private sector in urban capacity studies. The results of the study should be publicly available.'

Consultation Question 8

As set out in paragraph 87, do you think strategic development plans should set out the Housing Supply Target:

- a. only for the strategic development area as a whole;*
- b. for the individual local authority areas;*
- c. for the various housing market areas that make up the strategic development plan area; or*
- d. a combination of the above*

Consultation question 8 raises similar issues to consultation question 10 and both responses should be considered together.

Alignment/Sequencing

It is considered that [paragraph 87](#) sets out the appropriate timescales for planning for housing; however, there is an important change in function in that the SDP is now required to set out the Housing Supply Target. This task latterly sat with the Local Housing Strategy. Accompanying this change are alignment issues in regard to the HNDA, SDP, LHS and LDP that require further consideration. The issues relating to alignment in the context of the GCVSDPA are shown in Annex 2 and are related to the policy changes outlined below:

- SDP to set out the Housing Supply Target (HST) ([paragraph 87](#)).
- HNDA should be completed in good time to inform the SDP MIR along with local authorities' views on Housing Supply Targets ([paragraph 82](#)).
- In city regions LAs may wish to wait until the SDP has been approved before finalising the LHS, to ensure that any modifications to the plan can be reflected in the LHS and LDP ([paragraph 83](#)).
- Housing Supply Targets in Plans should equate to the Housing Supply Target identified in the LHS ([paragraph 84](#)).

Previously HSTs were set in the LHS and LHSs could be finalised after the end of the SDP MIR consultation period.

The LHS will need to be at draft stage at the latest in summer 2014 to allow the Housing Supply Target to be determined for the SDP MIR. If the LHS is not finalised until SDP approval, anticipated in May 2017, then there will be 3 years between the draft and the final LHS. The next 5-yearly cycle of LHSs are due to be published in 2016/17. There is an inconsistency relating to these timescales that requires to be addressed as a matter of priority by the Scottish Government. This situation is compounded in an SDP area where 8 draft LHSs will be required to feed into the SDP HSTs.

Determining the Housing Supply Target

There is a shift in Draft SPP in that the SDP has to set out the Housing Supply Target ([paragraph 87](#)) see also Annex 1. In order to be able to do this consistently across the local authorities there needs to be clear direction about how this part of the process should be undertaken. Housing Supply Targets were derived in Local Housing Strategies after the publication of SDP1 to inform LDPs. Authorities undertook this process using the limited guidance provided which was supplemented by the Reporters report to the GCV SDP1, paragraph 4.86a.

It will be the responsibility of each individual local authority to undertake this process for SDP2, however, the key difference is that the HSTs will have to be undertaken consistently as they will be aggregated and reported at HMA level in the SDP2 MIR as set out in Draft SPP paragraph 82. It is considered that SPP may not be the appropriate place to set out how to calculate the Housing Supply Target, this may sit better in revised HNDA guidance however, the process does need to be set out clearly in one of the housing guidance or policy documents.

It is suggested that [paragraph 82](#) could read;

*'Plans should be informed by a robust housing need and demand assessment (HNDA), prepared in line with Scottish Government's HNDA Guidance³⁵. This assessment provides the evidence base to inform both local housing strategies and development plans. It should be completed in good time to inform the main issues report, along with local authorities' views on Housing Supply Targets. **Guidance on how to derive Housing Supply Targets is provided in paragraph X or revised HNDA Guidance.** It should produce results both at the level of the functional housing market area and at local authority level, and cover all tenures'.*

Geography

In an SDP area the plan sets out housing requirements for the SDP area as a whole, for the HMA framework and then approximate results for LDP areas. The principal geography is the HMA framework, which for the GCV area crosses local authority boundaries. The SDP has an important role in the planning of city regions, regardless of local authority boundaries, and this role is particularly clear for the private sector functional housing market areas which operate across local authority boundaries reflecting an understanding of how and where people move house. The requirement to produce housing figures by LDP area gives an artificial picture of how the housing market operates in a city region context and HMA results should be seen clearly as the appropriate geography to assess, monitor and strategically plan for the housing requirements in a city region.

Terminology

It is considered that term 'housing land requirement' is confused with 'housing land supply' and we suggest the following changes to clarify this in [paragraph 87](#);

*'Strategic development plans should set out the Housing Supply Target for **each housing market area and local development plan area.** They should also state **how the Housing Supply Target will be achieved setting out the amount of land from the housing land supply and the broad location of additional land requirements** which should be allocated in local development plans to meet requirements up to year 12 from the expected year of plan approval. Beyond year 12 and up to year 20, the strategic development plan should provide an indication of the possible scale and location of housing land, including by local development plan area.'*

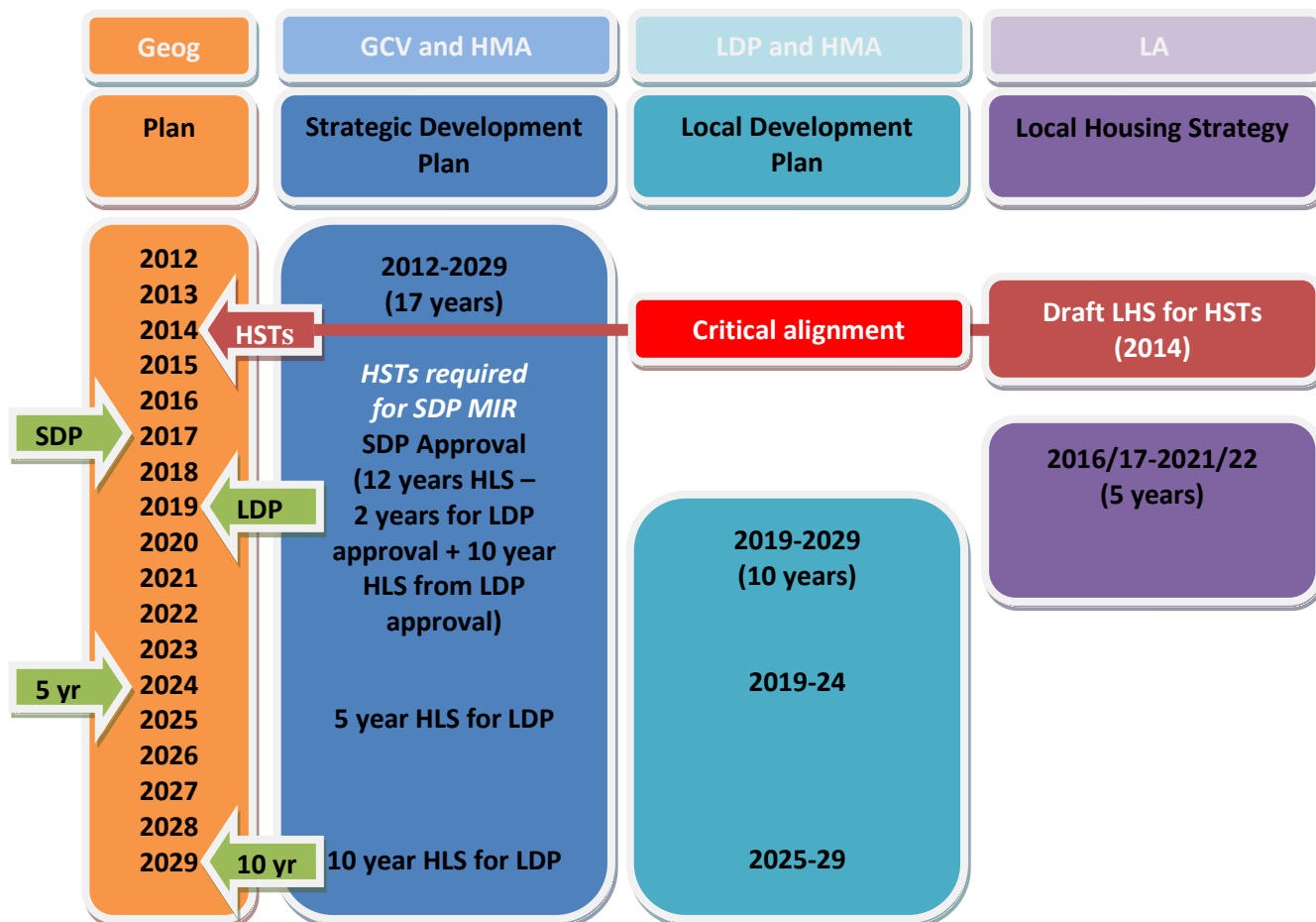
It is considered that the glossary definition of Housing Supply Target is incorrect and contradicts the text in this section. The Housing Supply Target and the housing requirement are not the same thing. The Housing Supply Target is the demand for housing plus the wider considerations outlined in [paragraph 84](#). A housing requirement is determined after a comparison of supply and demand, and is the additional land required over and above the supply identified in the housing land supply and urban capacity study. See also response to Consultation Question 6 including Annex 1.

Suggested definition of Housing Supply Target

'The net requirement for new build housing plus demolitions gives gross new build housing required. Planning authorities then take account of 'wider economic, social and environmental factors, including issues of capacity, resource and deliverability' through the draft Local Housing Strategy process resulting in the Housing Supply Target. This housing target is then compared to available supply to determine if there is an additional housing land requirement'.

Annex 2 - Alignment between SDP/ LHS and LDP

This is an illustration of the alignment issues between the three interlinked plans, the relationships and timescales that the GCVSDPA are likely to encounter for SDP2



- Under current arrangements the LHS is not required until 2016/17 and the LHS sets out Housing Supply Targets.
- Draft SPP advises that Housing Supply Targets should now be set out in the SDP MIR.
- The LHS is a critical stage in determining Housing Supply Targets therefore a Draft LHS is required to inform the SDP MIR in 2014 – 2 or 3 years before LHS submission is required.
- The inconsistency in the alignment of the three plans needs to be addressed.
- The SDP is required to provide housing figures for 17 years in order to provide the LDP with housing figures to years 5 and 10.
- Supply/demand comparisons will therefore be undertaken at years 2024 and 2029.
- An LHS is only required to provide figures for 5 years and is out of sync with the SDP and LDP.
- This is an issue the needs to be addressed now that the HSTs have to be set out in the SDP.

Consultation Question 9

Do you think the approach to how national parks address their housing land requirements, as set out in paragraph 90, is the appropriate approach?

An alternative would be for national park authorities to assess and meet housing requirements in full within their areas. Do you think this is the appropriate approach?

West Dunbartonshire Council is the housing authority for the whole council area. They are the strategic and local planning authority for the council area minus the National Park. The GCV strategic HNDA covers both housing and planning functions. There is therefore an inconsistency about the geography that the GCV HNDA should cover. It is considered that the Scottish Government should liaise with West Dunbartonshire Council, the National Park Authority and the CHMA regarding this inconsistency.

Consultation Question 10

Do you think the approach to identifying the five year effective land supply, as set out in paragraph 91, is the appropriate approach?

An alternative approach would be for the supply in strategic development plan areas to be calculated across local development plan areas. This would require strategic development plans to set out Housing Supply Targets for each local development plan. Do you think this is the appropriate approach?

Consultation question 10 raises similar issues to consultation question 8 and both responses should be considered together.

The GCVSDPA is supportive of the housing land audit process and works closely with its constituent authorities and Homes for Scotland. In a city region housing market areas are important and the housing land audit is undertaken consistently across the eight authorities to allow cross boundary housing figures to be assessed and requirements identified during the plan preparation process. The housing land supply in the city region has traditionally been programmed for 7 years, with the support of Homes for Scotland, to enable LDPs to maintain a minimum 5 year effective land supply and this approach will be continued.

It is considered that the approach to identifying a minimum five year effective land supply in a city region is appropriate; however, there should be acknowledgement that the housing market area is the most appropriate way to monitor and strategically plan for housing supply in a city region and not the local development plan area which is an administrative boundary that does not reflect functional housing market areas. SPP requests results at both levels to ensure clarity in the LDP; however, it is important that the primary assessment is within the housing market area framework, accurately reflecting how city region housing market areas operate.

Housing Market Areas

SPP should emphasise the importance of housing market areas and mobile demand to strategic planning in city regions and explain clearly what housing market areas are.

It is considered that this clarity has been diminished in planning policy and guidance in recent years. There was a clear definition in PAN 38 and subsequent publications: SPP3, HNDA Guidance, SPP 2010 and PAN 2/2010; have eroded this definition and all that remains is [paragraph 81](#) in Draft SPP which provides insufficient detail.

'Local authorities should define functional housing market areas i.e. areas within which demand for housing is relatively self-contained.'

This omits an important sentence from SPP 2010 paragraph 68 which states that *'Housing market area may significantly overlap and will rarely coincide with local authority boundaries.'*

More direction is given in HNDA Guidance (2008), page 10 which states that:

'Generally local housing needs assessments have in the past been based on local authority administrative boundaries. However these boundaries do not generally reflect housing market areas. Assessments should therefore have regard to functional housing market areas, which are defined in SPP3 Consultative Draft as "a geographical area which is relatively self-contained in terms of housing demand i.e. a large percentage of people moving house or settling in the area will have sought a dwelling only in that area".'

[Paragraph 81](#) may remain relevant in unitary authorities, however, in SDP areas more detail is required from the revised SPP acknowledging that housing market areas cross local authority boundaries and may operate at more than one level incorporating mobile demand. Mobility is an inherent characteristic of metropolitan housing market areas and this was

recognised in SPP3 and PAN38, although this was unhelpfully omitted from SPP and PAN 2/2010 and now Draft SPP. The GCVSDPA would like to see support in revised SPP for the twin concepts of mobile demand and a tiered system of HMAs which are a feature of metropolitan HMAs and have been incorporated into the way in which the comparison of supply and demand has been managed in the GCV conurbation first by Strathclyde Regional Council and subsequently for the GCV Structure Plan and Strategic Development Plan. This approach is based on the premise that while most demand is localised, there is an element that cannot simply be allocated to a particular area and can be considered to be mobile using Sasines evidence of house-buying moves and evidence of housing search patterns.

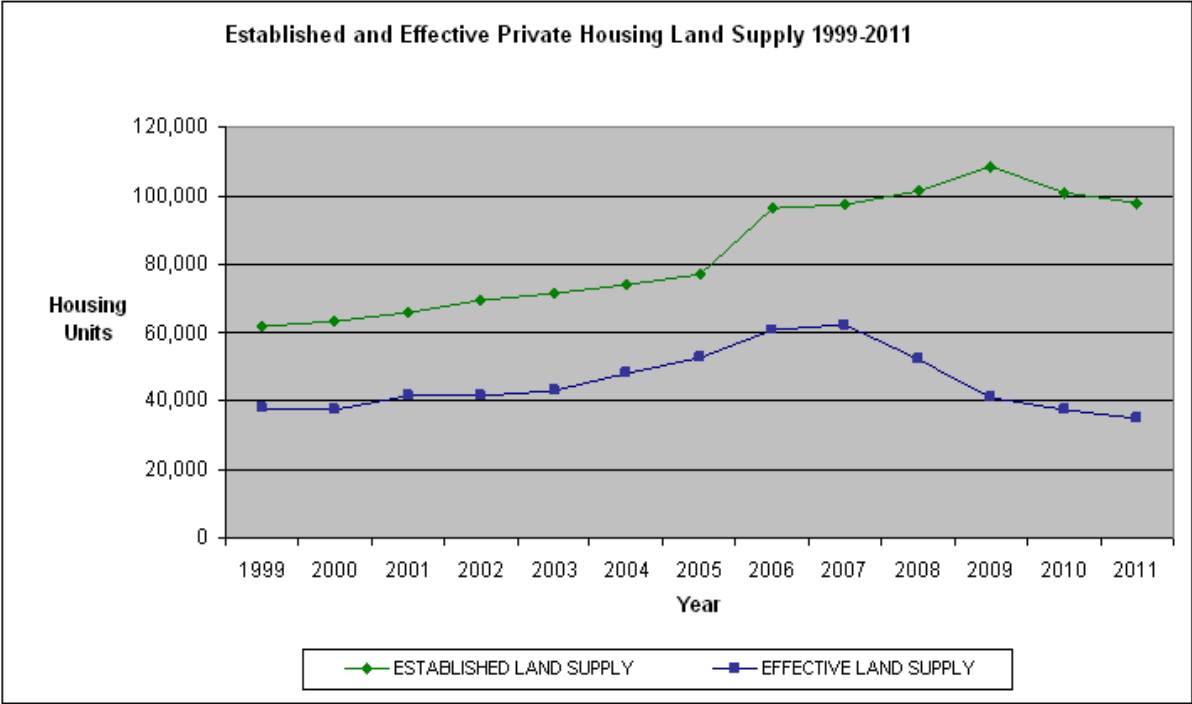
It is suggested that the following excerpt, paraphrased from former PAN 38 (paragraph 21), is included in the revised SPP at [paragraph 81](#) to provide clarity and direction to SDPAs:

‘Local authorities should define functional housing market areas. A housing market area is a geographical area where the demand for housing is relatively self-contained, i.e. where a large percentage of the people moving house or settling within the area have sought a dwelling only within that area. Housing market areas may significantly overlap and may not coincide with local authority boundaries. Around larger housing markets (i.e. city regions), an element of “mobile demand” may overlie more specific requirements focused on a number of more local housing market areas. Planning for housing...continue as is’

If greater clarity is not given in SPP then this should be specified in the revised HNDA guidance or a revised PAN 2/2010. However, it is important that the SPP reflects the role of strategic planning in the city region and the housing market area framework is a crucial component of how a city region operates.

Effectiveness

Determining the effectiveness of a site has become more challenging in the recent economic climate. Over a very short period of time sites that were deemed effective became non-effective, mainly on the grounds of financial viability. The balance of effective land as a percentage of the established land supply across the GCV area dropped from 65% in 2005 to 36% in 2011. Since Structure Plan records began in 1996 effective land as a percentage of the established land supply has consistently been above 60% (refer graph below).



Sites that otherwise would have been developed are now non effective and it is considered that releasing alternative sites is not a sustainable approach to delivering a coherent spatial strategy for the city region in the long term. This is particularly the case in an area covered by a strategic development plan with a twenty year time horizon. It is considered that the approach to effectiveness should be revised and has to give consideration to sites where the only constraint is the commercial prospect of the site in the short term.

Paragraph 20 states that *'Plans should be deliverable, identifying sites that can be developed within the life of the plan.'* **Paragraph 91** states that *'A site is only considered effective where it can be demonstrated that within 5 years it will be free of constraints relating to ownership, physical factors, contamination, deficit funding, marketability, infrastructure provision and land use policy, and can be developed for housing'*.

Plans can identify sites and deliver the ability to grant Planning Permission for housing on those sites. It is important that SPP is clear on the role of Planning, including its limitations, as well as the role and responsibilities of house builders and developers in meeting the delivery and design agenda.

The approach recommended under comments in relation to Question 1, (Sustainable Economic Growth) on stalled sites, is highly relevant to the discussion of effectiveness and the delivery issue. It is recommended that a more realistic approach to the impediments to development and stalled sites, is introduced within SPP, recognising that the supply of an "effective" 5 year land supply by current definitions and the addition of generosity to that land supply, is unlikely alone to significantly change current levels of delivery. The solutions to the delivery issue, lie in part outwith the scope of the Planning system and a recognition and understanding of that, will assist in identifying where the solutions lie.

Consultation Question 11

Do you think that the level of affordable housing required as part of a housing development should generally be no more than 25%, as set out in paragraph 97?

Level of Affordable housing contribution

The GCVSDPA considers that 25% as a benchmark for the level of affordable housing (as set out in SPP 2010 paragraph 88) is a more appropriate approach than the proposal in Draft SPP that the level of affordable housing should generally be no more than 25%.

It is considered that having a benchmark gives local authorities the flexibility required to reflect local circumstances, evidenced on the findings of the HNDA. Local Development Plan policy within some GCV authorities has been developed to achieve no less than 25% affordable housing on site and a restriction on this could affect authorities' ability to address housing need.

It is suggested that the second last sentence of [paragraph 97](#) should be deleted and replaced with;

'The benchmark level of affordable housing required by each site should be 25% unless evidence from the HNDA and LHS justifies otherwise.'

A further sentence should be added which continues the policy direction set out in paragraph 88 of SPP 2010 and [paragraph 5](#) of Consultative Draft SPP, specifically referencing authorities right to exercise local flexibility: *'The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances.'*

Type of Affordable housing developer contributions

In terms of developer contributions for affordable housing it is stated that *"...this should generally be for a specified proportion of the serviced land within a development site to be made available for affordable housing. Planning authorities should consider the level of affordable housing contribution which is likely to be deliverable in the current economic climate"*.

It is considered that it is for local development planning authorities to determine the appropriate type of affordable housing developer contribution. It is also considered that the level of affordable housing contribution should not be affected by the current economic climate if a need is identified in the HNDA.

In terms of developer contributions further clarification is required. PAN 2/2010 does not provide guidance on how a specified proportion of serviced land within a development site should be measured. For example, if there is a 25% requirement is this 25% of the site area, or an area of land capable of accommodating 25% of units. Furthermore, in terms of units provided should it be an average of what is proposed in the planning application or an average of what is needed in terms of housing need identified in the HNDA. Further guidance on this in a revised PAN would be useful in order that there is consistency of approach.

Affordable housing and specialist housing needs

It is considered that the final sentence in [paragraph 97](#) is new to Draft SPP and should be removed. Where an HNDA and LHS identify a requirement for specialist housing then it may be appropriate to apply an affordable housing quota policy.

[Paragraph 97](#) cross references [paragraph 100](#) where the reference to *'including housing for older people'* is considered too general. This is not considered sufficient to cover the range of housing authorities would expect to see delivered to meet these requirements. For example an affordable housing contribution should not be sought where sheltered housing is provided for the particular needs of older people at an affordable rent / sold at an affordable level or

where a Use Class 8 development is provided, for example a care/nursing home for residents requiring care. However, many housing developments referred to and marketed as 'housing for older people' are actually mainstream residential in nature and are often not affordable to local people on modest incomes (and there is no separate use class for older persons housing). Therefore unless the proposed development is Use Class 8 in nature, exemptions should only be made where the housing to be provided can be shown to be affordable to local people on modest incomes i.e. provided at an affordable rent or sold at an affordable level. If this is not the case, and contributions are not made to affordable housing, the result will be a significant affordability issue for older people.

It is suggested that the last sentence of **paragraph 97** should be deleted and replaced with; *'Where permission is sought for specialist housing, as described in paragraph 100, and evidence in the HNDA and LHS identifies an affordable specialist housing need, then it may be appropriate for the developer to make a contribution to affordable housing'*.

Delivering Affordable housing

The revision of SPP is also an appropriate opportunity to clarify the practicalities of delivering affordable housing. **Paragraph 99** states that *'Where it is considered that housing built to meet an identified need for affordable housing should remain available to meet such needs in perpetuity, supplementary guidance should set out the measures to achieve this.'*

It is considered that there are legal complexities surrounding affordable housing products and those that can be held in perpetuity. PAN 2/2010 would benefit from a revision investigating these issues and providing guidance to authorities to help the delivery of affordable housing and the most efficient use of available funding.

Intermediate housing

There is no reference in SPP to 'Intermediate housing'. The Scottish Government's Centre for Housing Market Analysis has produced an HNDA Tool to assist authorities in preparing their housing need and demand assessment. The Tool identifies net new housing requirements for Market, Private Rent, Intermediate Rent and Social Rented housing. It could be assumed that Intermediate Rent is a proxy for all forms of affordable housing excluding social rented housing. It would be helpful for SPP to reflect the terminology used in the HNDA Guidance and Tool and vice versa to ensure that the housing need and demand identified can be delivered through development plans on a basis of consistent interpretation.

Consultation Question 12

Do you think that the approach to addressing particular housing needs, as outlined in paragraphs 100 to 103, is appropriate?

There are many specialist housing requirements that will be identified in the HNDA. It is considered that these needs are most appropriately dealt with through the LHS and LDP.

Particular Needs housing

Paragraph 100 states *“As part of the HNDA, authorities should consider new build requirements for particular needs including housing for older people, sheltered housing, and other accommodation for residents requiring care.”*

It is considered that the term *‘housing for older people’* is not sufficient to cover the range of housing that authorities would expect to see delivered to meet these requirements. Please also refer to comments on **paragraph 97**.

Gypsy, travellers and travelling showpeople

Paragraph 101 states that *‘Within city regions, the strategic development plan will have a role in addressing cross-boundary considerations’* (referring specifically to gypsy, travellers and travelling showpeople).

It is considered that a national study by the Scottish Government into these specialist housing requirement would be appropriate to evidence base the HNDA. The transient nature of these groups significantly limits the effectiveness of more local studies.

Self-build plots

Paragraph 103 states that *‘Where planning authorities consider that self-build plots have a role to play in meeting housing requirement, they should identify suitable sites as part of their wider housing land allocations.’*

There is another reference to self-build plots in **paragraph 84**. This is the first time that self-build plots have been referred to in SPP as having a role to meet housing requirements and it is considered that further explanation would be helpful.

Glossary

Brownfield land should be reinstated in SPP and use the definition from SPP 2010:

'Land which has previously been developed. The term may cover vacant or derelict land, land occupied by redundant or unused buildings and developed land within the settlement boundary where further intensification of use is considered acceptable'.

Established Housing Land Supply should be defined as it is in PAN 2/2010:

'The total housing land supply - including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development.'

Five year effective land supply should be deleted as it is incorrect. The five year effective land supply is the programmed land supply through the housing land audit and is not a proportion of the Housing Supply Target. Supply and demand are being confused here.

Housing Supply Targets could be revised to read:

'The net requirement for new build housing plus demolitions gives gross new build housing required. Planning authorities then take account of 'wider economic, social and environmental factors, including issues of capacity, resource and deliverability' through the draft Local Housing Strategy process resulting in the Housing Supply Target. This demand for housing is then compared to available supply to determine if there is an additional housing land requirement'.

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Inverclyde Council

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Jamieson

Forename

Stuart

2. Postal Address

Regeneration and Planning

Inverclyde Council

Municipal Buildings

Greenock

Postcode PA15 1LY

Phone 01475 712401

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?

Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

2. How should we provide spatial guidance for onshore wind?

Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government's proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

Is spatial guidance for onshore wind best left to local authorities?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

3. How can onshore planning best support aspirations for offshore renewable energy?

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

4. How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

n/a

5. What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

6. Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement.

In addition in relation to Inverclyde being noted as a potential port site to support the offshore wind turbine sector, under the National Renewables Infrastructure Plan (NRIP), this is welcomed.

A NATURAL PLACE TO INVEST

7. Can NPF3 do more to support sustainable use of our environmental assets?

Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

Refer to GCV SDPA response with which Inverclyde Council is in agreement, and in particular, would stress the significance of safeguarding high value peat lands, of which there is a considerable resource in the Clyde Muirshiel Regional Park in Inverclyde, and the contribution it can make to mitigating the effects of climate change.

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

9. Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

In addition, references in the 'Areas of Coordinated Action' section to the roll-out of the £430 million investment over 16 years in new electric class trains for Ayrshire/Inverclyde (albeit already underway), should assist not only overcrowding but also benefit the tourism sector. Furthermore, the strategic significance of the Lower Clyde within the GCV 'Clyde Waterfront' Flagship Initiative should be emphasised in relation to its tourism potential as a growth sector, particularly in relation to the berthing of cruise ships at Ocean Terminal, Greenock. The volume of cruise traffic has increased greatly year-on-year and is projected to continue to do so.

The finalised NPF3 should make reference to this growth sector with particular reference to Inverclyde and this facility, once the 'Tourism Development Plan for Scotland' has been finalised by Visit Scotland.

10. Can NPF3 do more to support sustainable resource management?

Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

Refer to GCV SDPA response in relation to the approach to waste, with which Inverclyde Council is in agreement.

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

Refer to GCV SDPA response in relation to the important role of city regions and the town centres within them, with which Inverclyde Council is in agreement.

In addition to the GCV SDPA response and with particular reference to Inverclyde, while it is welcome that the GCV SDP, its Spatial Development Strategy and Spatial Frameworks are supported and taken a stage further in NPF3, it is disappointing to note that recognition is not given to the limited time that is left of the main implementing agency's 10 year designation, Riverside Inverclyde URC, and the clear need for a similar special regeneration agency or the local authority, to have continued levels of funding beyond the immediate period. This seems a curious omission for a 15-20 year Plan.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

In addition, with particular reference to Inverclyde and as in previous NPF documents, there is little recognition given to the role and purpose of regional parks. Regional parks should be accorded higher status in NPF3 (and the

finalised SPP) in recognition of the importance of their designations for the purpose of safeguarding these areas as significant environmental resources and landscapes for informal recreation, and the contribution they make to health and wellbeing. Regional parks cut across local and strategic authority boundaries, and their importance extends beyond the local or regional area.

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

Refer to GCV SDPA response with which Inverclyde Council is broadly in agreement, in particular the first and second paragraphs which concern Inverclyde greatly; while in the final observation regarding regional targets, yes it should be 'appropriately informed at the regional level' but within a national context which is now being encouraged through use of national-level data in the CHMA HNDA Toolkit. Rather than talking of 'targets', the correct terminology should be 'requirements' and these in turn should be related to consistent national and regional sustainable development and planning strategy objectives.

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

16. How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?

Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

In addition, the increasing role that Ocean Terminal in Greenock plays in regard to the attraction of cruise ships to the West of Scotland and beyond, alongside its significant freight handling function, should be recognised in the International Connections section. It is acknowledged that Map 25 identifies a number of ports and harbours on the Clyde.

Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?
2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?
3. Taking into account the environmental effects set out in the report, what are your views on:
 - a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
 - b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
 - c) The proposed suite of national developments to be included in the Proposed Framework?
 - d) Alternative candidate national developments?
 - e) The policies proposed for the Draft SPP?
 - f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?
5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?
6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

Inverclyde Council has no observations to make.

Business and Regulatory Impact Assessment (BRIA)

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

Inverclyde Council has no observations to make.

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RESPONDENT INFORMATION FORM

This is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Inverclyde Council

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Jamieson

Forename

Stuart

2. Postal Address

Regeneration and Planning

Inverclyde Council

Municipal Buildings

Greenock

Postcode PA15 1LY

Phone 01475 712401

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

PRINCIPAL POLICIES

- 1 Sustainable Economic Growth** Y N
- Do you think that the measures outlined in paragraphs 15 to 23 are appropriate to ensure that the planning system supports economic recovery and sustainable economic growth?
- Are there other measures to support sustainable economic growth that you think should be covered in the SPP?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

- 2 Location of New Development – Town Centres** Y N
- Do you think that local authorities should prepare town centre health checks, as set out in paragraph 55?
- Are there other health check indicators you think should be included in the SPP?

Refer to GCV SDPA response with which Inverclyde Council is in agreement and in addition, would stress the following.

The SPP should be consistent in its terminology - planning authorities or local authorities (refer to paragraph 55).

Agree that town centre health checks should be undertaken, but unclear as to whether the list of indicators is exhaustive or could be built upon. There should be flexibility as to what should be included as data for some of the indicators is not readily available – a set of core, essential, indicators should be identified to ensure some consistency, with others optional where resources allow. Core indicators could include those where data can be easily be collected through a basic survey, i.e. space in use for different functions, vacancy rates, leisure facilities.

More information as to what is meant by cultural and social activity and community activity would be welcomed, particularly in how they relate to leisure facilities – these can be inferred by the presence of e.g. community halls, leisure facilities and museums/theatres, as well as attitudes and perceptions. Greater clarity as to how indicators should be measured would also be welcomed, again to provide some consistency. For example, where/when footfall should be measured, should prime rental values be an average across the town centre or the highest value?

The number of indicators that should be included within a town centre health check should reflect how the data is to be collected and by whom. A wider set of indicators would be appropriate if the town centre health check is being undertaken by the community planning partnership at corporate/SOA level where a number of partners are feeding into the process as recommended in the National Review of Town Centres External Advisory Group Report. If they are

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being undertaken by planning teams, even with input from partners, it is unlikely that the same level of detail could be covered due to resource constraints.

Town centre health checks should be updated as often as reasonably possible, at least every 2 years.

3 Location of New Development – Town Centres

Do you think that local authorities should prepare town centre strategies, as set out in paragraph 56?

Y N

Refer to GCV SDPA response with which Inverclyde Council is in agreement and in addition, would stress the following.

Agree that local authorities should prepare town centre strategies as set out in paragraph 56 but feel it is important that this is done at the right level, i.e. through the community planning partnership rather than falling to planning departments to co-ordinate. There needs to be buy-in at a corporate level, perhaps by including town centres, health checks and strategies within the SOA process to ensure the full engagement of a wide range of partners.

4 Location of New Development – Town Centres

Do you think the town centre first policy should apply to all significant footfall generating uses and the sequential test be extended to this wider range of uses, as outlined in paragraphs 63 to 67?

Y N

An alternative would be to apply the sequential test to retail and 'all' leisure development, no longer limiting leisure to 'commercial' development. Do you think this is the appropriate approach?

Refer to GCV SDPA response with which Inverclyde Council is in agreement and in addition, would stress the following.

Agree the town centre first policy should apply to all significant footfall generating uses and that the sequential test should be extended to a wider range of uses as outlined in paragraphs 63 and 67, although there should be scope for planning authorities to make exceptions to the sequence of locations where appropriate. Reference to this should be made earlier in the Town Centres section, paragraph 54 could state: "The planning system should promote town centres first for a mix of uses particularly where they generate significant footfall..." in order to accord better with para 63 and make sure this important and different aspect of policy is stated upfront.

5 Location of New Development – Rural Development

Y N

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

Do you think the approach to spatial strategies for rural areas outlined in paragraphs 68 to 71 is the appropriate approach?

Refer to GCV SDPA response with which Inverclyde Council is in agreement, but would note in addition, that the word "prosperous" should be removed (para 68), as Planning should support all sustainable communities, whether prosperous or not.

BUILDINGS

6 Housing

Do you think explaining a 'generous' housing land supply as allowing an additional margin of 10 to 20%, as set out in paragraph 85, is the appropriate approach?

An alternative would be to state that a generosity factor should be added to the land supply, and that this may be smaller in areas where there can be confidence that the sites identified in the plan will be developed in the plan period, and larger in areas where there is less confidence in the deliverability of the land supply. Do you think this is the appropriate approach?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress a number of additional matters.

The introduction of the term 'generous land supply' into the glossary of housing has proved unhelpful. This is due to the absence of a clear definition. As a generic term it still lacks clarity in its meaning, especially when applied across all local authority and SDPA circumstances. The term 'flexibility', which it seems to replace is better understood and allows for an interpretation more suited to the wide range of individual circumstances across the country and also has the advantage in that it can apply to both the demand/need and supply side of housing assessment. So, the answer to the question is 'No'.

The term 'generous housing land supply', as currently understood, also has the potential to undermine sustainable development and 'planning for housing' in the city regions, particularly in Glasgow and the Clyde Valley. The longstanding and primary rationale for strategic planning in the Glasgow City Region has been to ensure that the legacy of vacant and derelict land (our 'brownfield inheritance') remains the preferred focus of new development. Without this focus there will be less sustainable urban containment and therefore, no continuation of the long term rewards that regeneration and urban renewal has brought to the area.

Generosity of supply is a concept that may be relevant to areas undergoing growth and development, and where that can only be accommodated through expansion beyond the current urban area. It may also be a concept more relevant for a time of forecast economic growth and necessary expansion, not for the current depressed economic circumstances – forecast to continue for some years to come – and for areas where planning is concerned more with

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

managing the restructuring of the urban area and in some parts, managing decline.

Reflecting on the above, the supplementary question appears to be counter-intuitive. If there is less confidence in the deliverability of the land supply, then presumably that is where adding additional flexibility would have a role, not the reverse? If by definition that generosity could only be found on sites that are more readily effective and more easily developed, this would in all likelihood undermine strategic objectives and set back currently faltering progress on urban renewal.

Linked issues : HNDA - Housing Supply Targets - Alignments

The introduction of the term generous land supply coincided with the introduction of the HNDA and the concept of Housing Supply Targets (HSTs). This is another illustration of the limitations of the draft SPP, failing to provide a clear definition and understanding of new concepts. The need for clarity in the use of HSTs and what they are is essential if it is to be of value in the assessment of the requirements for additional land to meet the housing requirements in the city regions. It is vital that not only a clear definition of HSTs is provided, not least to ensure a consistent approach to its use in all local authorities within the four SDPA areas, but also to provide a clear 'roadmap' for the different professionals involved in using the outcomes of HNDAs for the purposes of both the development plan (SDP and LDPs) and LHSs.

The draft SPP Glossary for HSTs does not help. The definition is equated with 'housing requirement', which is surely incorrect. Housing requirement is the total amount and type of housing necessary to accommodate the assessed demand and need for housing, as calculated in the HNDA, having taken into account the existing land supply and other factors such as the wider social, economic and environmental factors which would influence the final assessment. Housing land requirement is the expression of this in terms of ensuring there is an adequacy of sites, with capacity, to meet the housing requirement, having allowed for other means of provision, eg. better use of existing buildings and the use of the existing stock.

HST's as a rule will always be less and therefore different from the housing land requirement, since this concept equates more with the capacity and resources (in all respects) to deliver housing, not unlike the 'effective land supply'. Targets should be more concerned with deliverability, ie. the potential and/or likelihood of the requirement being met, over set timeframes. HSTs are therefore both a subset of the 'effective land supply' calculation, but also a measure which takes into account the potential to provide housing through means other than new land supply. This full range of provision is part of the HST calculation, including the use of empty properties, better use of existing properties, management of the existing stock and importantly the role of re-lets in the social rented sector. It is not the same as housing requirement, or indeed housing land requirement.

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

7 Housing

Do you think that authorities should be able to include an allowance for windfall development in their calculations for meeting the housing land requirement, as set out in paragraph 86?

Y N

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would make the following point in relation to what the Draft SPP seems to be suggesting on this matter.

'Windfall' is such a constant in the churn of land falling out of use and being made available for development and has always been an important component of land supply, so the answer to the question would tend to be 'Yes'.

However, in addition to the confusion noted over this matter with urban capacity in the GCV SDPA reponse, windfall could be readily outted by adopting a recognisable assumption on its contribution, based on the previous 10 years experience. In many respects, windfall should provide the additional flexibility that is important in maintaining an 'effective land supply' and in that regard is relevant to the approved GCV SDP Strategic Support Measure No. 10, providing LDPs flexibility over new housing development. This would replace any notions of adding more land to have a 'generosity' of supply, which asa indicated above (question 6), has the potential to add artificially to the total land supply and which in many cases would be counter productive in meeting estimated future demand and need.

8 Housing

As set out in paragraph 87, do you think strategic development plans should set out the housing supply target:

- a. only for the strategic development area as a whole;
- b. for the individual local authority areas;
- c. for the various housing market areas that make up the strategic development plan area; or
- d. a combination of the above

Y

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress a number of additional matters.

The posing of this question suggests a misunderstanding of the role and purpose of strategic planning, and the SDPA areas in Scotland.

The raison d'etre of SDPs is to plan at the regional / strategic scale, so why would strategic planning be undertaken other than to get a better understanding of the requirement for housing land across local authority boundaries, within

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recognisable functional housing market areas?

'c' defines the purpose of strategic planning in this regard, not 'b', otherwise what is the point of legislating for the SDPAs?

Restricting the exercise to 'a' similarly would undermine the purpose of the SDPAs.

The requirement to calculate the provision of housing land by local authority areas within the city regions has resulted in artificially increasing the supply, as it does not take into consideration the important cross-boundary movement that defines the housing market areas that they form a part. This insistence that the assessment be made on this artificial geography has already resulted in unrealistic housing land requirements being required in a number of authorities, creating real tensions between these requirements and the overall sustainable development objectives espoused in NPF and SPP documents and approved for the GCV SDP.

9 Housing

Do you think the approach to how national parks address their housing land requirements, as set out in paragraph 90, is the appropriate approach?

Y N

An alternative would be for national park authorities to assess and meet housing requirements in full within their areas. Do you think this is the appropriate approach?

Inverclyde Council has no comment to make on this matter.

10 Housing

Do you think the approach to identifying the five year effective land supply, as set out in paragraph 91, is the appropriate approach?

Y N

An alternative approach would be for the supply in strategic development plan areas to be calculated across local development plan areas. This would require strategic development plans to set out housing supply targets for each local development plan. Do you think this is the appropriate approach?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress a number of additional matters.

The calculations for both housing market areas and local development plan areas is unnecessary (refer to response to Question 8 above). The latter is artificial and misleading in relation to the private sector and most likely a large part of the 'intermediate' rented sector, since the assessment and comparison is appropriately at HMA level.

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

There has been considerable confusion introduced by the desire to have an 'all-tenure' effective land supply, given (1) the two main sectors of housing provision operate on different geographies; and (2) HSTs are more applicable for judgements in relation to the affordable sector and not conducive to assessing 'effectiveness', which is more applicable for the private sector. They are therefore, not measuring the same thing, hence the confusion in suggesting they are.

The supplementary question does not follow logically on from the first, but that relates back to a misunderstanding of what HSTs are (Question 6). There is no equivalence between housing supply targets and the 'effective land supply'. Housing supply targets refer more to 'deliverability', which when applied across all-tenures, introduces more uncertainty to the calculation, particularly for the affordable sector, which also cannot be looked at with any degree of certainty over a 5-7 year timeframe as has always been appropriate and required for the private sector.

11 Housing

Do you think that the level of affordable housing required as part of a housing development should generally be no more than 25%, as set out in paragraph 97?

Y N

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress a number of additional matters.

The existing benchmark level of a 25% contribution for affordable housing provision is a reasonable one, so stipulation of 'up to 25%' is neither helpful nor appropriate. Because circumstances do vary greatly over the country, and indeed within city regions and individual local authorities, there should be a more general acceptance of variation around the benchmark level, with local authorities having the scope to negotiate with developers a higher or lower, contribution, depending on the prevailing economic circumstances, housing market conditions and levels of identified need. Negotiation on a site-by-site basis may have more validity and there is a case for drafting affordable housing policies to allow for this flexibility.

12 Housing

Do you think that the approach to addressing particular housing needs, as outlined in paragraphs 100 to 103, is appropriate?

Y N

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

- 13 Business & Employment** Y N
Do you think the regular review of marketable sites for business, as set out in paragraph 110, should take the form of 'business land audits' in order to ensure identified sites are marketable?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, and in relation to the specific question, yes.

NATURAL RESOURCES

- 14 Green Infrastructure** Y N
Do you think that the provision of green infrastructure in new development should be design-led and based on the place, as set out in paragraph 163?
An alternative would be to continue with a standards based approach. Do you think this is the appropriate approach?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress the following.

Green infrastructure in new development should be design led to ensure existing green networks are taken account of and incorporated into the plans for the site at the earliest opportunity. This could be facilitated by the preparation of Supplementary Guidance. It also ensures that the features of individual sites are addressed rather than trying to apply general standards to all types of sites.

UTILITIES

- 15 Heat & Electricity** Y N
With reference to paragraphs 214 to 215, do you think heat networks should be developed ahead of the availability of renewable or low carbon sources of heat?
An alternative would be for heat networks to only happen where there are existing renewable and waste heat sources or networks. Do you think this is the appropriate approach?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress the following.

Heat networks should be developed prior to renewables or low carbon sources of heat being available. If they were to wait until these sources of heat were available in great enough numbers to create a network, there could be a long delay and the opportunity missed to make use of non-renewable networks that are already in existence. Even if these are not the ideal type of heat source, something beneficial can be taken out of them while they are in use.

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

- 16 Heat & Electricity** Y N
With reference to paragraph 218 and subsequent groups, do you think that the proposed increased community separation distance of up to 2.5km is appropriate?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress the following.

An increased community separation distance to 2.5km should be an option to allow for the larger turbines greater visibility. There should, however, still be the option to reduce this distance depending on the topography of the location for the wind energy development.

- 17 Heat & Electricity** Y N
With reference to paragraphs 216 to 219, do you think the proposed approach to spatial frameworks achieves the right balance between supporting onshore wind development whilst protecting the natural environment and managing visual impacts on communities?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to stress the following.

The new groups clarify the categories although regional designations (including regional parks) would be expected to be given greater protection by inclusion in group 2.

The proposed removal of the 20MW threshold would be consistent with the approach to be taken in the wind farm landscape capacity study currently being prepared for authorities within Glasgow and the Clyde Valley.

- 18 Heat & Electricity** Y N
Do you think the SPP could do even more than is drafted in paragraphs 222 to 224 to secure community benefits from renewable energy developments while respecting the principles of impartiality and transparency within the planning system?

Inverclyde Council has no observations to make on this matter.

- 19 Digital** Y N
Do you think the planning system should promote provision for broadband infrastructure (such as ducting and fibre) in new developments so it is designed and

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

installed as an integral part of development, as set out in paragraph 230?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would agree with the principle of this.

20 Flooding & Drainage

Y N

Do you think that Strategic Flood Risk Assessment should inform the location of development, as set out in paragraph 239?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would agree, yes.

21 Flooding & Drainage

Y N

With reference to paragraphs 245 to 247, do you think that where the Scottish Environmental Protection Agency (SEPA) has already granted a Controlled Activities Regulations (CAR) license then there should be no need for consideration of water and drainage issues by the planning system?

If a CAR license has already been granted by SEPA, this should be taken into account when water and drainage issues are given consideration by the planning authority.

22 Reducing & Managing Waste

Y N

With reference to paragraphs 248 to 262, do you think that planning policy for waste management should be consolidated into the SPP to be clear on the messages and to remove the need for further narrative in Annex B of the Zero Waste Plan?

Refer to GCV SDPA response with which Inverclyde Council is in agreement.

23 Overall

Y N

Do you think the proposed new structure and tone of the draft SPP is appropriate?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement, but would wish to make some additional points.

The layout of the draft SPP enables subjects to be found more easily, with the Key Documents and the Policy Principles sections welcomed. Much of the background text has been reduced, especially in the Historic Environment section, which will make the document more suitable for planners and other development professionals, but less so for new and occasional users. Should

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this not be a consideration for the final version of SPP?

- 24 Overall** **Y** **N**
Do you think the SPP should and can be monitored? If so, how?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement.

- 25 Overall** **Y** **N**
Do you think the SPP could be more focused? If so, how?

Refer to GCV SDPA response with which Inverclyde Council is in broad agreement.

- 26 Overall**
In relation to the Equalities Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on any particular groups of people.

Inverclyde Council has no observations to make.

- 27 Overall**
In relation to the Equalities Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

Inverclyde Council has no observations to make.

- 28 Overall**
In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on business.

Inverclyde Council has no observations to make.

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29 Overall

Do you have any other comments? If so, please specify the relevant section and/or paragraph.

Refer to GCV SDPA response supporting the views of the Heads of Planning, with which Inverclyde Council is in complete agreement.

In addition, there are a number of specific matters worthy of mention.

(1) There is little recognition given to the role and purpose of regional parks and the importance of their designations for the purposes of safeguarding their significant environmental resources and landscapes for informal recreation. Appropriate recognition is sought in the finalised SPP which would be of great benefit in preventing inappropriate development within their boundaries, including the cumulative effects of onshore wind turbine development.

(2) An issue that requires clarification in the final SPP concerns the status of green belts. In paragraph 49 it is stated clearly that 'Where necessary, the development plan may designate a green belt to support the spatial strategy' followed by the reasons for doing so and the types and scales of development which would be appropriate within the green belt. However, at the conclusion to this section in paragraph 52, it states 'For most settlements a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations.' These two statements present a rather ambiguous stance on the future of green belts.

(3) The section on the Historic Environment has been significantly reduced, with a greater focus on conservation areas. Others such as Scheduled Monuments, Gardens and Designed Landscapes are covered superficially, reduced to one sentence in some cases. Would question whether this is adequate and appropriate.

(4) The stronger wording on the preparation of conservation area appraisals, ie 'Article 4 Directions should be supported by conservation area appraisals...' as opposed to 'Planning authorities are encouraged to undertake conservation area appraisals' is to be welcomed. It is considered this could give greater leverage to funding requests to carry out this work.

(5) 'Enabling' is mentioned in both the Policy Principles and Development Management as possibly being acceptable if it is the only means of retaining a listed building. This is the same as SPP2010 but the wording 'the new development should be designed to retain and enhance the special interest, character and setting of the listed building' is no longer included. Although this is likely to be expressed in some form in the development plan, it is worth stating in the SPP for extra weight, especially since the wording 'the effect of a proposed development on a designed landscape should be a consideration in decisions on planning applications' has also been removed from the Gardens and Designed

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Landscape section, which only refers to 'protect and enhance'.