

Falkirk Council

Response to NPF4 Consultation

1. Introduction

Falkirk Council welcomes the opportunity to contribute to the preparation of NPF4. The document provides an opportunity to provide new direction, focus and clarity for the spatial planning of Scotland up to 2050, taking account of the emerging priorities of climate change, well-being and inclusive growth. The merging of Scottish Planning Policy into NPF4, and its incorporation as part of the development plan is also an opportunity for a more consistent approach to policy and decision-making across Scotland. However, there is a need to ensure sensitivity to the needs of the different parts of Scotland, and to build flexibility into the approach so that planning authorities are still free to develop local policy responses to local issues and circumstances.

The Council's response includes:

- An overview of the Falkirk area's priorities and positioning within the national and regional context;
- Submissions on three National Developments which the Council would wish see included in NPF4; and
- Comments on key national planning policy areas.

2. Overview

Our Place

The Falkirk Council area lies at the heart of Scotland, and is home to a population of 160,000 people. Although a relatively compact area, its size belies its importance to the national economy, identity and sense of place. It is at the hub of the road and rail network. Historically, it was the cradle of the first industrial revolution in Scotland, and still retains strategically important sectoral strengths in manufacturing and logistics. At Grangemouth, it hosts Scotland's largest concentration of chemical and petrochemical industries, Scotland's only oil refinery, and the country's largest port, handling one third of national GDP. This highlights the area's importance as a manufacturing base for a wide range of industries with a secure source of critical materials. It is home to the Falkirk Wheel, the Kelpies and the Helix, which have become modern day icons of Scotland, and internationally recognised tourist attractions. We are an area of small to medium sized communities, each with a proud identity, which has seen substantial growth over recent years, partly due to excellent accessibility to the main employment centres of the Central Belt. This has put our physical and social infrastructure under some strain. We have been at the forefront of green network development for many years, and easy access to high quality natural greenspace is one the key attractions of the area.

Our Regional Identity

From a regional perspective, while Falkirk is a distinct sub region with a discrete housing market area, it has important interdependencies with neighbouring areas, notably the city regions of Glasgow and Edinburgh both of which are highly accessible by road and rail. However, we also have

strong functional and historic ties with Stirling and Clackmannanshire Councils to the north as part of a Forth Valley region, and it is with this regional grouping that we are actively exploring common issues as the 'buckle in the belt' of Central Scotland, and the link between the city regions. We have responded to the Scottish Government's invitation by jointly commissioning consultants to work with us to prepare an indicative Regional Spatial Strategy for the Forth Valley area. The outcome of this work will be submitted separately in June 2020.

Our Priorities

Falkirk Council's vision and priorities for its area, as expressed within our Strategic Outcomes and Local Delivery Plan, Local Development Plan 2, Economic Strategy and Investment Zone Growth Deal bid, align closely with the desired outcomes for NPF4. In terms of the questions posed in the NPF4 consultation, we would stress some national priorities which will be of particular importance to the future prosperity of the Falkirk area and the wellbeing of those live and work here.

Development needed to address climate change

The industrial complex at Grangemouth is one of the largest contributors to greenhouse gas emissions in Scotland, emitting some 4m tonnes of CO2 annually. Scotland cannot meet its zero net emissions commitments without **addressing Grangemouth's carbon footprint** and facilitating a transition to clean technologies. The basic ingredients of the transition – the town's industrial and port infrastructure, its transport and pipeline connections, its skills, research and innovation base – are present, but require further significant investment to deliver the change. Hence we have made a submission for the Grangemouth Investment Zone as a National Development to be retained and its scope broadened (see Appendix 1).

Changing travel behaviour and **reducing transport related emissions** presents challenges for areas such as Falkirk where population densities are lower and communities more dispersed than in the cities. There are issues with the quality of public transport infrastructure, and the quality, frequency and cost of public transport services, which need to be addressed. Although Falkirk has invested heavily in active travel infrastructure over recent years, with positive outcomes, there is still a need for substantial public sector investment to complete key connections described in the SEStran Regional Transport Strategy (RTS) and further developed by the specific SEStran Strategic Network study which seeks to achieve strategic links between communities, transport hubs and places of employment in Falkirk and beyond.

Likewise, notwithstanding the potential for use of waste heat in Grangemouth, lower population densities present issues with the **viability of heat networks and district heating schemes** which offer the potential to reduce the emissions associated with heat generation. The scale of investment needed to realise these opportunities, and the fact that this will not happen without public sector leadership and investment, and private sector buy-in, needs to be recognised.

There is potential in our area, and across Central Scotland, for **carbon offsetting through the creation of new woodlands and other habitats** which are able fix carbon. In our accompanying submission supporting the continuation of the Central Scotland Green Network as a National Development, we have suggested that action on climate change should become a key priority for the

project. We also consider that there is potential across the CSGN for upper catchment management measures to contribute to **natural flood risk mitigation** within our communities.

Support for quality of life, health and wellbeing

The Falkirk Council area is characterised by a number of **small and medium sized communities, each with their own strong character and identity**. Their modest scale, traditional local centres, and easy access to countryside and greenspace are what people value about these places. We are a popular, growing area, and whilst there is a recognition of the need for new housing, many of these communities feel that the character of their communities is under threat from new residential development especially where heavy car dependence impacts on the balance of movement and 'place' considerations in nearby town centres. This is exacerbated by the decline of local centres and local facilities. There are clearly limits to the capacity of our communities to accept ongoing, large scale growth without fundamentally changing their character, and this needs to be recognised. We believe that choices around housing growth, where it happens and at what scale, are driven too much by the pursuit of numbers, rather than **a place based approach which prioritises the character and needs of the community**.

The Falkirk Council area has an excellent track record of developing **multi functional green networks** which we believe have contributed enormously to the sense of place and well being of our communities. These provide high quality greenspaces for people to enjoy close to where people live, reducing the need to travel for recreation. We consider that the further development of green networks should continue to be a priority across Central Scotland, and that, alongside continuing public sector delivery, the level of investment in green infrastructure within new development needs to be increased. Therefore we continue to support the National Development status of the Central Scotland Green Network (see Appendix 1).

Development and investment in our economy to benefit everyone

Grangemouth makes a major contribution to the Scottish economy through its chemical and petrochemical sector, and its port and associated logistics sector. The INEOS site has over 100 hectares of brownfield land which presents an opportunity of national scale for further development. Our Investment Zone Growth Deal bid highlights the potential to develop Grangemouth as a centre for the development of carbon capture and utilisation technology, and biotechnology, allowing the industrial complex to successfully transition over time to a zero carbon economy. This will complement the wide range of manufacturing capability and potential in Grangemouth. The Falkirk area, including Grangemouth itself, continues to have significant pockets of deprivation, and we consider that there are major opportunities to improve the skills and education pathways to allow more local people to access employment opportunities in Grangemouth. There are also continuing opportunities to develop the freight handling capacity of the port and inter modal facilities to allow transfer of more freight from road to rail. All of these new opportunities are reflected in our continued support for National Development status for the Grangemouth Investment Zone, and are highlighted within SEStran's RTS, and SEStran's freight study for sea – rail connections, currently underway for SEStran ports including Grangemouth. They also need to be factored into the Second Strategic Transport Projects Review; key STPR2 transport interventions identified for immediate and other regions should be complementary to the aims of new NPF4 developments and be jointly designed to minimise negative transport impacts.

The Falkirk Council area has seen huge growth in visitor numbers and expenditure on the back of investment in key attractions such as the Falkirk Wheel, the Kelpies and the Helix. Tourism will continue to play a major role in the Scottish economy, and the area sees itself playing a part in this, complementing and diversifying what is available in the traditional tourist centres of the cities and the Highlands.

Improving, protecting and strengthening the character of our places

Our town centres are at the heart of our communities, and **healthy town centres will remain a vital ingredient of a sustainable Scotland going forward to 2050**. However, like many centres across Scotland, Falkirk Town Centre and the area's smaller District Centres have been hollowed out by changing shopping patterns and rationalisation of the retail sector. Whilst actions are in hand to improve our centres and assist in the process of adaptation and repurposing, the economic shock arising from the coronavirus pandemic is likely to further accelerate decline. The revival of our town centres needs to be a national priority, almost deserving of a thematic National Development in its own right.

Green belt has played an important role in successive planning strategies within the Falkirk area since the 1960s, albeit that it has taken a different form from typical metropolitan green belts. In the Falkirk context, it has supported regeneration, protected the identity and character of our communities, and created the opportunity more recently for green network development which has enriched its function and value to the community. We consider that green belt will have a continuing role in our area in defining land which should be subject to long term safeguarding from development.

The natural and built heritage of the Falkirk Council area has perhaps been undervalued in the past, but we have taken major steps in recent times towards **highlighting and enhancing assets of both national and local importance**, as a driver for regeneration and placemaking. This might provide an exemplar for other areas whose assets and role in the national story have been similarly underplayed. We would particularly draw attention to the Upper Forth Estuary, the Lowland Canals and the Antonine Wall World Heritage Site as strategic, cross authority assets which merit continued protection and investment to realise their full potential. Whilst the best of our heritage assets benefit from strong national designations, we would also highlight the importance of local designations and the weight that should be attached to these in planning decision making.

Infrastructure needed to realise our long term ambitions

The Council and its partners have identified **infrastructure required to support inclusive economic growth at Grangemouth** through both its Tax Increment Financing (TIF) initiative and its recent Investment Zone Growth Deal bid. This includes important road, rail, port, and active travel infrastructure, but most significantly the Grangemouth Flood Protection Scheme, which is the highest priority flood risk management scheme in Scotland. We consider that the scale and importance of this investment merit its identification within NPF4 as a discrete National Development (see Appendix 1). The Port of Grangemouth is currently the largest container port in Scotland, through which around a third of national GDP passes, and we consider that it will continue to be a key international freight gateway going forward to 2050.

Delivery of infrastructure to enable community growth has been more problematic and continues to be an issue both locally and nationally. Local people are generally supportive of new housing where a co-ordinated 'infrastructure first' is taken. However, this is rarely the case in practice. In the Falkirk Council area, strategic transport, drainage, and education infrastructure deficiencies continue to constrain new housing growth in certain parts of the area, particularly those which have experienced the most rapid growth over recent years. Capacity of healthcare facilities is also becoming an issue. Local authorities do not have the resources to deliver the scale of infrastructure upgrades required, and developer contributions are often a clumsy or ineffective tool, particularly where land values are not high. The infrastructure levy is unlikely to offer a solution to the problem. New delivery models, supported by the necessary resources, are needed to ensure that real communities are built over the coming years, and not just housing.

3. National Developments

The Council considers that the following projects should benefit from National Development status in NPF4:

- Grangemouth Investment Zone
- Grangemouth Flood Protection Scheme
- Central Scotland Green Network

Details of these are contained in the National Development Response Forms in Appendix 1 of this submission. We would highlight that the Grangemouth submissions have been informed by a workshop comprising stakeholders from key agencies and industry who sit on the NPF3 Grangemouth Investment Zone Action Programme group.

4. Policy Comments

General

With the setting of development plan policies being shared between NPF and local development plans, the relationship between the two must be clear, particularly the scope for national policies to be interpreted and elaborated at the local level.

Housing

Housing continues to be the most contentious and problematic national planning policy area, in terms of the translation of national priorities into delivery at the local level. This has been exacerbated by a lack of clear government guidance, and a skewed view of the reasons behind delivery issues.

Housing targets

The Planning (Scotland) Act 2019 requires NPF to include 'targets for the use of land in different areas of Scotland for housing'. This is a major change to current practice, whereby targets are set locally at the local authority or housing market partnership level, guided by HNDAs which are also prepared locally. The Scottish Government's discussion paper issued in conjunction with the NPF4

consultation aims to provide guidance on how the new process will operate. We would comment on it as follows.

In terms of the **geographical basis** for targets, a separate figure should be set for the Falkirk Council area, as it is a discrete housing market area. There is no basis or rationale for the setting of a figure at the Forth Valley level (Falkirk, Stirling and Clackmannanshire Councils), and the disaggregation of such a figure to the three local authority areas would create unnecessary difficulties. Although the three authorities are working informally to develop an indicative Regional Spatial Strategy to input to NPF4, there is no commitment yet to a joint Regional Spatial Strategy, and even if such a document were prepared, it is not part of the development plan and would not necessarily provide a robust and suitable vehicle for dividing up a regional target.

The housing land target should be expressed in **housing units**. The discussion paper seems to emphasise housing land, giving the impression that it will be expressed as a land area.

In terms of **establishing baseline need/demand**, the use of HNDA steps 1 and 2 is only the starting point for establishing targets. This is the simple part of the process, and whilst this can be done at the national level, it does not particularly save time or effort to do so. It is important that the most up to date household projections are used for this stage of the process (new household projections are due in July 2020). If authorities propose to accept the default (or principal) projection this should be considered robust and credible and not be questioned. As the guidance indicates, if authorities want to put forward alternative demographic scenarios, these should be justified. It would also be helpful not to call the consideration of these alternative projections 'scenarios' as this has a distinct meaning in a later stage of the HNDA model.

The product of the HNDA steps 1 and 2 is not the target. Other **local factors** – economic, social, environmental, capacity, resource and delivery – must be considered in the setting of the target. Without this 'policy view', the figures will have no local sensitivity, and there will be problems delivering the target. The discussion document accepts that 'a national approach needs to be informed by regional and local knowledge, analysis and input', but it is not clear how this is to be factored into the process. It is essential that the current flexibility for local authorities to adjust the figures to reflect local circumstances should remain, albeit that this needs to be evidenced.

In light of the foregoing, it may be more helpful for NPF4 to express its target for housing land as an estimate based on steps 1 and 2 of the HNDA which local authorities then use to produce detailed local area based targets for housing delivery.

The guidance does not tackle the issue of **base dates** for the calculation of targets in LDPs. It is not clear whether the base date would be the date of publication of NPF4, the adoption date of the LDP, or the base date of the HNDA/household projections. This became an issue of contention in our recent LDP examination. We consider that the base date should be the date of adoption, rather than the base year of the household projections, and whilst consideration could be given to the period before LDP adoption, notional historic shortfalls going back over a number of years are of limited relevance and should not be added into the target.

The issue of **timescales** and the impossibility of synchronising the NPF4, the LHS and the LDP cycles in any given local authority area is not properly addressed. Synchronising LDP and LHS locally has

been problematic, and this is going to get even more difficult with NPF4 becoming part of the process. It is possible for example that an LDP/HNDA could commence some time after NPF4 at which point new household projections were available. Would this mean that the new data could not be taken into account? The discussion document talks about 'testing the appropriateness of the target' when the interim HNDA/LHS is produced. It is not clear how this could be fed into NPF4 or LDPs. It is also unclear over what period the housing land target would be set, and for what period detailed allocations would be made.

The discussion paper indicates that the Scottish Government would add a **level of flexibility** to the output from the HNDA tool to establish the minimum housing land figure. In terms of the terminology used, clarification is sought that this 'flexibility' is effectively the same as the generosity allowance which is currently set at 10-20% in SPP, and that the 'minimum housing land figure' is the equivalent of the current housing land requirement. There are obvious questions as to what this level of flexibility would be set at. Would it be a standard figure across all authorities or varied according to circumstance, and if varied, on what evidence would the rate be based?

On **deliverability**, the guidance states that an agreed proportion of housing to meet the target should be deliverable. It is unclear what 'deliverable' means, to what period deliverability would relate, and who 'agrees' the proportion. It also needs to be recognised that planning authorities have relatively little control over delivery – in the main this is the responsibility of housebuilders.

On **tenure split**, whilst it is accepted that this is needed for LHS purposes, it is questionable whether there is any point defining this within the LDP. In practice, we treat the target as an all tenure target, and the split does not influence actual planning decisions.

Effective Housing Land Supply and the Housing Land Audit

The requirement to maintain a five year effective housing land supply, and how it is calculated, needs to be reviewed. It continues to be a source of confusion in the system, and the way it is applied is undermining the plan led system.

Planning authorities have the power to allocate land for development, but they have very limited control over the delivery of that development. Yet the five year effective land supply effectively measures programming and delivery of sites, rather than supply. Thus a 'shortfall' may occur, not through lack of effective land, but because of delays on the part of those promoting the sites, or macroeconomic factors which are, likewise, outwith authorities' control. This then renders the housing provisions of the plan out of date, and effectively leads to an ad hoc approach to the allocation of additional sites, often by appeal.

The performance of planning authorities in maintaining an adequate land supply should be judged in terms of the amount of unconstrained land allocated in plans or granted planning permission. It should not be based on past delivery or future programming which is dependent on the housebuilding industry, or wider economic factors. Where genuine shortfalls do occur, a more plan led approach is needed to enable the right sites to come forward, rather than the plan being considered out of date. Authorities could specify broad areas or settlements where there is available infrastructure, or identify key criteria to be met. It must also be clear that any additional sites will actually be capable of increasing build rates, and addressing any shortfall in a reasonable timescale.

Specialist and Affordable Housing

New planning policy should not be prescriptive in relation to specialist housing provision recognising that the later stages of the HNDA and the LHS will draw out local needs. It should also not assume that there is a need for a self build/custom build policy in every area. The planning system may not be the best mechanism to address the requirement for wheelchair accessible housing across all tenures. Insisting on an annual all tenure target without buy in from the private sector will not lead to a change in all tenure supply of such housing types and could put additional pressure on the affordable housing sector to deliver wheelchair accessible housing.

Affordable housing contributes to infrastructure pressure and national policy could address whether or not it should pay developer contributions, or benefit from an exemption. There is a wide difference of approaches across Scotland which RSLs and housing authorities find difficult to understand. If affordable housing providers do not make a contribution, the Council will have to take on that additional burden. Equally for housing authorities who may be paying market value for internal land transfers this can be an additional burden which limits the scale of housing delivery.

Sustainability

The current presumption in favour of sustainable development, as a concept and a material consideration, is a source of confusion and does not work well. In practice, what constitutes sustainable development should be defined by the policies of the development plan. The current sustainability criteria within SPP paragraph 54 are too vague and imprecisely drafted to be used as criteria for assessing planning applications, which is what frequently happens. If a new planning definition of sustainable development is seen to be required within NPF4, it needs to align closely with the NPF's defined outcomes, with emphasis in particular on climate change, inclusive growth and well being. However, it would be better to simply to rely on development plan policies.

Rural Development

The character and needs of rural areas vary widely across Scotland, and we support the existing differentiated approach to rural planning policy. Falkirk's rural area is characterised as accessible and pressured, and we need continuing strong policy tools to avoid unsustainable sporadic housing development, and promote the regeneration of our rural villages. We suggest that NPF4 should lay down a broad policy framework for each rural typology, within which planning authorities should have the freedom to set down detailed, locally sensitive criteria in local development plans.

Economic Development

There will be a continuing need to safeguard land for future economic development needs. In the Falkirk Council area the delivery of business and industrial property on new sites has been slow due to viability issues, and this has led landowners, even Scottish Enterprise itself, to seek alternative, more lucrative uses, to achieve immediate returns. Economic development land should be seen as a long term resource, and short term viability issues should not allow good employment sites to be lost. Care needs to be taken over concepts such 'over supply' since within our area, patterns of demand are unpredictable, and it is important that sites continue to be available to service a wide range of enquiries which may come in.

There is also a continuing need to protect existing core business areas from non-conforming uses which would compromise their function or flexibility. These can be distinguished from other business areas where a more flexible approach can be taken.

Better guidance on business land audits would be helpful, including criteria for defining marketability.

Infrastructure and Developer Contributions

The co-ordinated and timely delivery of infrastructure in conjunction with development is one of the most significant challenges facing planning in Scotland. In addition to providing a more rigorous requirement and framework to ensuring sustainable transport options to be 'built in' to new developments prior to occupation, NPF4 needs to provide a coherent framework for developer contributions, confirming topic areas where contributions can be sought, and providing guidance on methodology and certain common issues. Within this framework, detailed contribution rates reflecting local circumstances would be set out in local development plans. We would particularly welcome confirmation that primary healthcare facilities are a legitimate subject for developer contributions, as this is an area of social infrastructure which is being put under increasing pressure by housing growth in parts of our authority area.

Town Centres

Town centres continue to face severe challenges, and the 'town centres first' approach should continue to be the basis for national planning policy. The Falkirk Council has a well established hierarchy of town centres, comprising the Principal Centre of Falkirk, four District Centres, and a number of Local Centres. We also have two Commercial Centres. National policy should be flexible enough to accommodate different networks and hierarchies across Scotland.

Natural and Historic Environment

Assets and resources of national importance, and statutory designations, are obvious candidates for standardised national policy. However, it is also important that there is a strong framework for the protection and enhancement of locally designated sites, which could include local landscape areas, wildlife sites, sites of importance for nature conservation, geodiversity sites, areas of townscape value, and designed landscapes which are not included in the Inventory of Gardens and Designed Landscapes. There would be value to a more standardised approach to local designations.

Flooding

It would be beneficial if NPF4 set climate change allowances for flood risk assessments and strategic flood risk assessment. This would ensure a standardised approach to consideration of flood risk through development planning and development management. It would also future proof local development plans, ensuring increased flood risk from climate change is taken into account in the allocation of sites.

Energy

There needs to be a more structured and transparent review, at Scottish Government level, of the effectiveness of Section 3F policies in facilitating carbon reduction. If it is deemed that Section 3F

policies are the most effective means, NPF4 provides an opportunity to implement a national policy for implementation of Low and Zero Carbon Generating Technologies (LZCGT) in new development.

At present, planning authorities have the power to determine their own policies and the method of how this is applied to developments. This has resulted in a fragmented approach that is difficult for developers and the public to understand. Policies across Scotland vary widely and differ in how they are applied, with some being tied to percentage of emissions reduced using LZCGT and others using certifications such as “Bronze Active” as minimum standards. In addition, there is also confusion regarding at what point in the planning process relevant energy statements and information should be submitted. With a national policy there would be uniform requirements across Scotland, making it clearer to developers what standards are expected in new development, regardless of the planning authority. This would also provide a clear process for determining whether applications meet policy and when information should be submitted in the process to satisfy policy. If Scotland is to meet its target of becoming target neutral by 2040, it is important that the planning system contributes through effective use of Section 3F policies.

Minerals

Policy should address how the development of mineral sites relates to the net zero carbon agenda. The requirement to identify areas of search for surface coal extraction should be removed.

There is limited information on workable reserves available for aggregates in some local authority areas and the onus should be on operators to provide evidence to justify further workings or extensions to existing workings.

Waste

The relationship between the Zero Waste Plan, the Making Things Last Strategy and the planning system is not clear. SEPA produces annual capacity reports, however they do not appear to be widely disseminated and there appears to be little discussion on waste management requirements within the development plan particularly with regard to landfill. Given the coming ban on biodegradable municipal waste (BMW) going to landfill it would be useful to have a better understanding of the planning system’s role in supporting the circular economy. There is no analysis on what the capacity figures mean for waste management planning across the country and what the implications are for individual authorities.

The removal of BMW from landfills will not mean the closure of landfill sites but may require additional facilities to treat this waste stream. Local development plans need to be able to address national and regional requirements including the continued use of some landfill sites and an increase in Energy from Waste Plants and where they are best located. This also has implications for heat networks. Landfill sites may be seen by operators as sites with potential for other waste management uses which could have an impact on planned restoration and further guidance on this would be useful.

Appendix 1 National Development Submissions

Planning for Scotland in 2050
National Planning Framework 4



Scottish Government
Riaghaltas na h-Alba
gov.scot

National Developments – Response Form

Please use the table below to let us know about projects you think may be suitable for national development status. You can also tell us your views on the existing national developments in National Planning Framework 3, referencing their name and number, and providing reasons as to why they should maintain their status. Please use a separate table for each project or development. **Please fill in a [Respondent Information Form](#) and return it with this form to scotplan@gov.scot.**

Name of proposed national development	Grangemouth Investment Zone
Brief description of proposed national development	<p>The further development of Grangemouth as a nationally significant location for industry, energy and freight; its transformation into a centre for excellence and innovation in low and zero carbon technologies, facilitating the decarbonisation of Scotland’s industrial and energy sectors; the enhancement of industry and community links; the regeneration of the wider town to arrest its decline and ensure that benefits flow to the local community; and infrastructure required to support this process.</p> <p>This would include:</p> <ul style="list-style-type: none"> • The redevelopment of 100+ hectares of vacant land at INEOS for the development of co-located research and manufacturing facilities including but not limited to biotechnology and carbon capture utilisation and storage, and a range of supporting sites capable of accommodating supply side businesses • A link from Grangemouth to the Feeder 10 pipeline enabling transport of carbon dioxide, and delivering on national decarbonisation objectives • The development of the port’s freight handling capacity and the extension of rail freight facilities and capacity for energy related development.

	<ul style="list-style-type: none"> • Support for wider freight and passenger movement on the Forth • The improvement of the town and the port's accessibility through improved trunk road and sustainable transport connections • The delivery of the Grangemouth flood protection scheme to protect industry and homes in the town • The restructuring and improvement of the town centre to address high levels of commercial vacancies and to repurpose key public buildings • The delivery of a revitalised 'green heart' to the town through the restoration of Zetland Park • Energy solutions, including district heating, to provide affordable, low carbon energy to the local community • The delivery of compensatory investment in the town and its environment to meet placemaking and carbon offsetting objectives
<p>Location of proposed national development (information in a GIS format is welcome if available)</p>	<p>The town of Grangemouth, comprising the operational land of INEOS and Forth Ports, the Earls Road chemical industries cluster, other core business areas, the town centre, and residential neighbourhoods.</p>
<p>What part or parts of the development requires planning permission or other consent?</p>	<p>Most elements will require planning permission or other consents. Port-related development on operational port land may benefit from permitted development rights. The flood prevention scheme is being progressed under flood risk management legislation.</p>
<p>When would the development be complete or operational?</p>	<p>Development is ongoing and the transformation process will be long term extending at least to 2050. The current growth deal package presents a 15-20 year package of investment.</p>
<p>Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.</p>	<p>The development is already a National Development in NPF3, but this submission seeks to extend the scope and ambition of the project significantly in an effort to address current and future challenges and opportunities.</p> <p>Most of the key sites and infrastructure projects are identified in both the adopted Falkirk LDP1</p>

	<p>and the emerging Falkirk LDP2.</p> <p>Funding for certain key infrastructure elements is in place through the Council's TIF programme. Scottish Government funding is in place for the flood protection scheme, although additional funding is likely to be required to meet revised cost estimates.</p> <p>The Council's growth deal bid has a clear focus on the Grangemouth Investment Zone, and seeks funding for the projects necessary for Grangemouth to transition successfully to net zero carbon and ensure investment delivers truly inclusive growth.</p>
<p>Contribution of proposed national development to the national development criteria (maximum 500 words):</p> <p>Grangemouth is currently a key National Development in NPF3, reflecting its importance as the largest chemical manufacturing centre in Scotland, and the country's largest port. Major investment in its industrial and logistics capacity has continued since 2014, strengthening its position as a national economic asset. However major challenges and opportunities lie ahead, related to climate change and inclusive growth agendas, to which Grangemouth must respond over the period of NPF4.</p> <p>Climate Change</p> <p>The industrial complex at Grangemouth is one of the largest contributors to greenhouse gas emissions in Scotland, emitting some 4m tonnes of CO2 annually. Scotland cannot meet its zero net emissions commitments without addressing Grangemouth's carbon footprint and facilitating a transition to clean technologies. The basic ingredients of the transition – the town's industrial and port infrastructure, its transport and pipeline connections, its skills, research and innovation base – are present, but require further significant investment to deliver the change. The Council's current growth deal bid identifies proposals for public investment to support the process, including the development of carbon capture utilisation and storage (CCUS) technology and industrial biotechnology. Through a redefined National Development, NPF4 needs to support this necessary step change in Grangemouth's development in order to achieve national decarbonisation objectives.</p> <p>People</p> <p>As well as being host to a major industrial complex, Grangemouth is a community of some 16,500 people. Its population is declining, its town centre is struggling, and significant parts of the town are amongst the 10% most deprived areas in Scotland. The town no longer appears to derive significant benefits from the growth and investment in the chemical and petro-chemical industries. A</p>	

redefinition of the National Development in NPF4 offers the potential for a greater focus on the health, wellbeing and quality of life of the local population. It could support restructuring of the town centre; the potential for cheap, low carbon energy through district heating networks in the town; improved transport infrastructure to mitigate traffic impacts on the community; and the protection of residential properties through the flood protection scheme. The growth deal bid's Resilient Industrial Environments project will help to co-ordinate data and analytics across Grangemouth, thereby reducing risk to the community from major events such as flooding and pollution.

Inclusive Growth

Grangemouth has continuing potential for major economic growth, given the town's sectoral strengths and extensive industrial land availability. Infrastructure which is proposed through the current TIF programme, the flood protection scheme, and the Council's growth deal will safeguard and promote this potential over the period to 2050. At the same time, as indicated previously, parts of the area experience above average levels of poverty and inequality. There is major opportunity to create skills pathways to connect local people suffering economic disadvantage with the job opportunities that will be created.

Place

There are significant opportunities for place enhancement as part of a redefined Grangemouth Investment Zone. The restructuring and revitalisation of the town centre is a key element in reasserting the identity of the town as a good place to live, but there is also potential for 'greening' of the town through the Zetland Park project, which is underway and has obtained Heritage Lottery funding, and the extensive tree planting planned as carbon offsetting in association with the flood protection scheme.



National Developments – Response Form

Please use the table below to let us know about projects you think may be suitable for national development status. You can also tell us your views on the existing national developments in National Planning Framework 3, referencing their name and number, and providing reasons as to why they should maintain their status. Please use a separate table for each project or development. **Please fill in a [Respondent Information Form](#) and return it with this form to scotplan@gov.scot.**

Name of proposed national development	Grangemouth Flood Protection Scheme
Brief description of proposed national development	<p>The Grangemouth Flood Protection Scheme (FPS) will provide a minimum of 1 in 200-year standard of flood protection to approximately 3,000 residential and non-residential properties, plus Grangemouth’s refinery, petrochemical plant, port and associated nationally important infrastructure. It is identified as the highest priority flood risk management scheme in Scotland within the Forth Estuary Flood Risk Management Strategy published by SEPA in 2015.</p> <p>The FPS will provide protection from fluvial flood risk primarily from the River Carron, River Avon and Grange Burn (including the Westquarter and Polmont Burns) and coastal flood risk from the Firth of Forth. Some secondary measures shall also be integrated into the scheme to protect against pluvial flood risk.</p> <p>The FPS as currently proposed comprises a total length of approximately 25 km of flood defences (flood walls and embankments) and includes bank/ channel restoration, coastal revetment and flow control measures. The scheme design requires complex and innovative engineering solutions to address port and refinery infrastructure and difficult access, both within and outwith the industrial complex. The redesign and replacement of the lock gate arrangement in the port is a key closure. Numerous pedestrian and</p>

	<p>vehicular flood gates (both road and freight rail), ramps, footpaths and landscaping are incorporated. Environmental mitigation and the provision of compensatory habitat to fulfil legislative requirements will complement the scheme.</p> <p>Falkirk Council is promoting the FPS under the Flood Risk Management (Scotland Act) 2009. Extensive work has been carried out to date including hydrological modelling, ground investigation, environmental studies, option assessment, consultation, and outline design. Formal scheme notification is expected late 2020.</p>
<p>Location of proposed national development (information in a GIS format is welcome if available)</p>	<p>The FPS is divided into six flood cells which cover a high proportion of the urban area of Grangemouth (including the port, the estuary frontage, the town centre, most of the residential part of the town, and land immediately to the south of the town) and areas of Carron/ Carronshore/North Falkirk falling within the floodplain of the River Carron west of the M9.</p>
<p>What part or parts of the development requires planning permission or other consent?</p>	<p>The FPS is being progressed under the provisions of the Flood Risk Management (Scotland) Act 2009, and when confirmed will benefit from deemed planning consent. There will be a number of other consenting processes required including HRA, marine licence, CAR licence, scheduled monument consents and protected species licences</p>
<p>When would the development be complete or operational?</p>	<p>Scheme notification is scheduled for later in 2020, and timescales will depend on the need or otherwise for a public local inquiry. Construction of the main scheme works is not anticipated to commence until 2024, and the full project will take up to 10 years to complete, with discrete sections being completed in phases within that time.</p>
<p>Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt</p>	<p>The FPS is identified as the highest priority flood risk management scheme in Scotland within the Forth Estuary Flood Risk Management Strategy.</p> <p>Flood defences are already referenced as part of the Grangemouth Investment Zone National</p>

of funding etc.	<p>Development in NPF3.</p> <p>It is highlighted in the adopted Falkirk Local Development Plan and the merging Local Development Plan 2.</p> <p>Funding discussions with the Scottish Government, which is expected to provide the majority of funding, are ongoing. The scheme will also draw some funding from the Council's ongoing TIF initiative.</p>
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Contribution of proposed national development to the national development criteria (maximum 500 words):

Although flood defences are already referenced as part of the Grangemouth Investment Zone National Development in NPF3, it is considered that the scale, importance, and level of investment of the FPS (latest estimate of some £220m) merits status as a National Development in its own right. It will contribute to the national development criteria as follows:

Climate Change

Flood risk to the community, industrial complex and port is potentially exacerbated by climate change predictions. Given the contribution of Grangemouth to the national economy, consideration to climate change has been incorporated within the design. Where appropriate and practical, scope for adaptability will be considered and an adaptation plan prepared. This is particularly important within residential areas where building with climate change, given the uncertainties, may not provide a palatable solution at the outset. National guidance in respect of climate change predictions is being utilised. There is an aspiration to incorporate carbon offsetting within the project. The form and appropriateness of the likely measures is currently being considered.

People

The scheme will offer protection to thousands of residents in the town whose homes are at risk of flooding. This includes areas identified within the 10% most deprived areas of Scotland. The scheme will also protect key social and community infrastructure. As such, it will therefore support the health, wellbeing and quality of life of Grangemouth's population.

Inclusive Growth

Grangemouth's petrochemical/ chemical sector and port is of major importance to the national economy. The port is Scotland's largest sea container port, and it facilitates the flow of over £6 billion worth of goods annually, around one third of the country's GDP. Grangemouth hosts Scotland's only crude oil refinery which provides the country with the majority of its fuel needs. The petrochemical plant employs approximately 1,400 staff, with an additional 2,000 contractors and 10,000 jobs reliant on the Grangemouth site. The scheme will protect this strategic

economic asset, and the potential for future investment and growth in the site.

Place

The scheme area has a number of environmental assets, not least the intertidal area of the estuary which is part of the Firth of Forth Special Protection Area, and the Victorian heart of the town which boasts a number of listed buildings and Zetland Park, which is subject to a current regeneration project. The scheme will inevitably have a range of environmental impacts, which are being assessed through the scheme EIA, with mitigation and compensation opportunities being highlighted. A large amount of bird data has been assembled in relation to the SPA, which is enabling a greater understanding of species distribution and behaviour. The design of the scheme aims to limit the impact on cultural and heritage assets and maintain access to parks and green spaces which may be affected by the scheme. The scheme has an aspiration to be carbon neutral, which may provide opportunities for environmental enhancement through tree planting in and around the town.



National Developments – Response Form

Please use the table below to let us know about projects you think may be suitable for national development status. You can also tell us your views on the existing national developments in National Planning Framework 3, referencing their name and number, and providing reasons as to why they should maintain their status. Please use a separate table for each project or development. **Please fill in a [Respondent Information Form](#) and return it with this form to scotplan@gov.scot.**

Name of proposed national development	Central Scotland Green Network
Brief description of proposed national development	<p>Falkirk Council supports the continuation of the Central Scotland Green Network (CSGN) as a National Development. Its transformational vision for the creation of a multifunctional green network across Central Scotland, delivered at a variety of scales, is even more relevant than when it was first conceived.</p> <p>However, CSGN’s focus and priorities within NPF4 need to be updated and broadened to address current and emerging policy agendas. In NPF3, the priorities are stated as active travel, vacant and derelict land, and disadvantaged communities. While these are commendable in themselves, they are now too narrow and output focused for the challenges and opportunities we face up to 2050. The new assessment criteria set out for National Developments – climate change, people and well being, inclusive growth, and place - provide a more ambitious, comprehensive and outcome focused set of priorities for the CSGN, setting out the wide ranging benefits of large scale ‘greening’ which could accrue to Scotland as a whole.</p> <p>In particular, addressing climate change should be put at the centre of CSGN’s agenda. The CSGN area offers huge scope for the carbon offsetting which will be needed if Scotland is to achieve its zero net carbon objectives. The</p>

	<p>origins of the CSGN lie in the Central Scotland Forest project of the 1980/1990s and attention should turn again to tree planting at scale, as envisaged in our own Forestry and Woodland Strategy, together with other complementary rewilding and habitat restoration schemes. There should also be an increased focus on surface water management in upper catchments to mitigate escalating flood risk in our urban areas.</p> <p>Consideration also needs to be given to delivery across the CSGN area, including co-ordination of local strategy development (how the various local authority greenspace, open space and forestry strategies link up, support CSGN objectives, and find expression in local development plans and regional spatial strategies), local project implementation (funding and staff resources to deliver projects on the ground), and the future role of CSGNT in supporting these processes, and monitoring overall progress. A 'one size fits all' approach is not necessarily recommended across the whole area, as the capacity of different authorities and the issues they face will vary.</p>
<p>Location of proposed national development (information in a GIS format is welcome if available)</p>	<p>The current 19 local authority areas across Central Scotland.</p>
<p>What part or parts of the development requires planning permission or other consent?</p>	<p>As at present, many environmental works will be of a scale and nature that do not require planning consent. Larger schemes involving engineering works or structures will of course require planning permission. Other consents may be relevant depending on the nature and location of the works.</p>
<p>When would the development be complete or operational?</p>	<p>This is an ongoing, long term project which will run to 2050 and beyond.</p>
<p>Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.</p>	<p>CSGN is recognised as a National Development in NPF3 and is widely referenced in development plans across Central Scotland.</p>

Contribution of proposed national development to the national development criteria (maximum 500 words):

Climate Change

As described above, the scope of CSGN to contribute to carbon reduction objectives is extensive. Large scale tree planting, rewilding and habitat restoration (e.g. peatland) will deliver carbon sequestration. Surface water management schemes in upper catchments have the potential to mitigate increased flood risk arising from climate change. Active travel projects will support modal shift away from the car, and the development of attractive recreational opportunities close to where people live will reduce the need to travel.

People

The contribution which accessible, high quality greenspace and good path networks make to the health and well being of local people is now well established. They promote outdoor exercise which promotes fitness and combats obesity, but also have proven benefits for mental health. These issues are recognised as national priorities.

Inclusive Growth

CSGN can promote inclusive growth by creating high quality environments which are more likely to attract inward investment. Through the Helix, the Kelpies and the broader Falkirk Greenspace Initiative, Falkirk has also demonstrated the power of investment in greenspace and associated outdoor activities to build a tourism product which generates additional visitor numbers and spending, and supports the creation of tourism-related businesses.

Place

The contribution of greenspace to place quality is self evident. Well designed and maintained open spaces enhance the identity of places and how they are experienced by residents and visitors alike. CSGN also supports biodiversity through promoting the creation of new habitats, the better management of existing habitats, and the better linking up of habitats to create wildlife corridors for the movement of species.