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GLASGOW CITY COUNCIL - NPF4 CALL FOR IDEAS SUBMISSION

Thank you for the opportunity to support the production of NPF4 and have welcomed the spirit of co-production that the Government has promoted in this Call for Ideas. This submission represents the input of officers from planning and a range of other disciplines who are in some way involved in the delivery of the planning service or whose activities are affected by its delivery.

Purpose of Planning

Before responding to the questions it is helpful to consider how the Planning (Scotland) Act 2019 has introduced a Purpose of Planning which states:

- (1) *“The Purpose of planning is to manage the development and use of land in the long term public interest*
- (2) *Without limiting the generality of subsection (1), anything which-*
 - a. *Contributes to sustainable development, or*
 - b. *Achieves the national outcomes (within the meaning of Part 1 of the Community Empowerment (Scotland) Act 2015)*

Is to be considered as being in the long term public interest.”

The key messages in the purpose are therefore:

- Planning should operate in long term public Interest, which
- Includes activity that contributes towards sustainable development or delivers on the national outcomes.

The clarification of this purpose is pivotal in directing how planning is expected to manage and direct the development of land going forward. “Long term public interest” provides clarity that there must be a common and shared benefit from the decisions made and that these are based on an understanding of the outcomes for the medium and long term and respond to implications for future generations. A key element of this is considering how much weight is given to short term economic benefit in decision-making and how this should be balanced against broader outcomes including sustainability, wellbeing or health that may only become recognised when considering long term cumulative impacts.

The inclusion in the Purpose of contributing towards “sustainable development” is also significant. This marks a shift from previous iteration of the National Planning Framework where position was delivering Sustainable Economic Growth. That focus provided clear scope that policy was to be weighted in a way that economic growth was to be afforded high prominence in decision making but that this was still to pay heed to the necessity to achieve sustainability.

The position in the Purpose of Planning in the 2019 Act refers explicitly to sustainable development which, it is reasonable to conclude, is intended to give balanced or equal weight to economic, social and environmental outcomes.

The reference to planning helping to deliver National Outcomes is also vital as these represent tangible aspirations relating to National Performance Framework (NPF) and cover a broad range of outcomes that inevitably go beyond the delivery of economic growth. While it is important to recognise that economic growth is represented and vital in order to deliver services and facilities and

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create opportunities, this is framed in the terms of “Inclusive Economy” where there is “Fair work for everyone”

Examining these intentions from the newly introduced Purpose of planning, it is clear that the planning system is to play a core role in delivering the NPF Purpose to achieve a “successful country with opportunity for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth”.

While this refinement for the context of NPF4 is significant, it is also important to recognise that throughout the existing planning policy framework, much of the necessary policy approaches are already aligned with the principles the NPF seeks to achieve. However, the Act cements an important refinement that emphasis upon the non-economic outcomes must now be given as much weight. The challenge for NPF4 and upon decision makers will be ensuring this is translated into outcomes on the ground and ensuring focus upon the “long term public interest”

Approach to the Questions

Each of the questions have first been considered in terms of how they align with the Purpose of Planning and how the Purpose should frame how they are answered. Within the scope this sets out, the overarching questions are specifically answered reflecting the early level of this engagement process. This has informed an attempt to avoid overlapping answers, however there are inevitably topics that span many of the questions.

In preparing responses, it was considered that the first four questions can be translated to describing specific outcomes that the Planning system should aspire towards in alignment with the Purpose of Planning. The fifth, Infrastructure question, was treated differently as it was recognised that infrastructure will be the driver that supports the delivery of the outcomes in the first four questions. However, it is worth emphasising that while infrastructure is seen as an enabler rather than outcome, this does not preclude an Infrastructure First approach, rather it should inform it, where providers are engaged early and the focus is upon enabling long term decisions that are future proofed and reflect the long term public interest.

Role of Governance and Co-ordination

In preparing the Council officers’ response it was also recognised that spanning all of the questions is the need for co-ordinated governance and alignment of ambitions towards the National Performance Outcomes. Without a joined up approach in service delivery, where achieving the national outcomes is the clear ambition, it is likely that NPF4 will fail to deliver the step change in the planning system that the Act targets. Therefore, it is encouraging that there is broad recognition that planning must be regarded at the heart of investment decisions in delivering our national outcomes. On this basis every effort must be made to ensure that NPF4 matches these collaborative expectations by mapping out key interactions and relationships. However, this must also ensure that the expectations of NPF4 are matched by all other partners in delivering Scotland’s future, particularly in terms of long term funding arrangements.

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COVID19 Consequences

As we go through the COVID 19 outbreak and the consequences of the lockdown we are experiencing new challenges and our living environments are being used in new ways. It will be necessary to examine the evidence to inform a response to this. However, anecdotal and intuitive reactions would suggest that many of the themes covered in this submission are endorsed by the recent experiences. Access to open spaces, access to facilities and the opportunity to live in a more resilient community are all factors that will play a role in improving our environment.

1 What Development will we need to address Climate Change

Climate change presents society with a 'whole-system problem' that requires a holistic approach to rethinking our human made systems. Climate change is arguably the most pressing long term issue facing Scotland's human population and ecosystems. It is also shifting the scope of public policy toward a longer-term horizon which is challenging the recent focus on short-term economic growth.

The Planning (Scotland) Act 2019 states that the 'purpose of planning is to manage the development of land in the long term public interest'. Town and Country Planning is central to addressing climate change because *how* and *where* we build the environments we spend our lives in directly impacts the health and wellbeing of the planet and society. This question is central to the development of NPF4 and the future practice of town and country planning in Scotland.

Climate Change Mitigation and Development

Scotland has a successful track-record of reducing carbon emissions. For example, energy sector emissions have declined by ¾ of their 1990 levels primarily led by advances in renewable energy. Nevertheless, other carbon emitting sectors have not seen the same level of decline over the same period. Transport related emissions, for example, have increased over the past 5 years. Carbon emitting sectors have strong interrelationships, requiring an inclusive policy approach to their long term reduction.

► **Recommendation 1: NPF4 should align with the work of the Scottish Infrastructure Commission to create a spatial framework for carbon emission reduction.**

This framework would express where the Government will seek opportunities for carbon emission reductions in at least two key areas:

Reducing Scotland's reliance of fossil fuels by supporting the development of:

- Renewable electricity generation and storage;
- Local heat generation and storage;
- Zero carbon transportation systems (integrated within the National Transport Strategy) and;

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Enhancing Scotland's carbon sinks, such as its:

- Oceans;
- Forests;
- Soil;

Climate Change *Adaptation* and Development

Adaptation to climate change will expose new and unpredictable vulnerabilities to Scotland's human population and its ecosystems. It is also likely to bring some new opportunities, such as longer growing seasons. The degree of adaptation required in various parts of the country will be contextual. Localised frameworks to climate change threats that enable place-based decision making. Partnerships such as Climate Ready Clyde will address local risks related to climate change.

To ensure that the national land use planning policy, national planning policy and placemaking objectives are aligned, NPF4's message should be link with the following policy frameworks:

1. Regional Adaptation Strategies
2. Scottish Infrastructure Commission recommendations (and future development)
3. National Performance Framework outcomes:
 - Community Resilience
 - Supporting Infrastructure
 - Inclusive Economic Growth
 - International Partnerships
 - Climate Justice for Vulnerable Groups
 - Increasing the Resilience of the Natural Environment
 - Protecting and Enhancing Scotland's Coasts and Marine Environments

Additionally, NPF4 will need to demonstrate how the government will support the development of green infrastructure, increasing biodiversity, and utilizing Nature Based Solutions across the country. National level projects should be identified in the plan whereas other commitments are likely most appropriately carried out at the local level. Finally, digital connectivity across the country could have transformative effects for society and reduce our need to travel between places to conduct business.

► **Recommendation 2: NPF4 fully aligns with the Climate Change Act (2009), supporting the delivery of local climate change adaptation frameworks**

Reestablishing Compact Urban Form in Scotland

The design and morphology of the built environment plays an critical role in determining carbon emissions and the carbon intensity of a given population. The infrastructure we build today, 'will

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determine patterns of land-use, transport choice, housing and [human] behavior' for many decades to come.

Dense, compact settlements require less infrastructure than sprawling development patterns. They also support a range of placemaking objectives which can influence less carbon intensive lifestyles. Compact urban forms promote a number of mutually reinforcing co-benefits for climate resilience and health and wellbeing, such as:

- Walkability;
- Mixed uses;
- Public transit links;
- Public amenities and public spaces in close proximity

Challenging the 20th century Suburban Model

Despite good examples of this successful urban density throughout the country, the post-war period has seen the expansion of a lower density suburban development model which is still popular today.

The biggest challenge that these environments pose is a general lack of infrastructure that can facilitate behavioral change that is both climate and resource conscious. This includes but is not limited to:

- Embedded car dependency;
- Lack of walkable amenities;
- Segregated land uses;
- Lackluster open spaces

When compounded, this creates long term challenges, potentially undermining mitigation and adaptation, health and wellbeing. Many of the neighbourhoods being built today will likely require some degree of 'place-mending', whereby solutions are sought that adapt them to 21st century requirements for both climate resilience and the health and well-being of residents. By 2050, we can expect that 80% of what is already built will still be around, making place-mending imperative in delivering climate mitigation and adaptation.

If the Scottish Government is to realize its goal of creating environments which are environmentally sustainable and encourage better health and wellbeing, it needs to consider the status of this development model as a means of achieving that aim.

Glasgow's Compact City Region Model

The Glasgow City Region (including both Glasgow's City Development Plan and Clydeplan) support a compact city model that is based on prioritizing inner urban growth by focusing on the regeneration of vacant and derelict land. Nevertheless, infrastructure constraints have made this policy aim difficult to achieve at scale within meaningful timelines (doubly challenged by the city region's post-recession economic recovery).

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While Glasgow has seen progress in repurposing its vacant and derelict land it still retains the largest amount of urban VDL in Scotland totaling over 1000ha and making up almost 10% of the national total. It is probable that those positive conversions to use are likely to be the cases of “low growing fruit” and the reality is that a high proportion of VDL that remains has been in that state for decades. Therefore, a concerted effort will be needed to capitalise of the climate change aspirations set out in the NPF and Act.

► Recommendation:

- 3 NPF4 explicitly supports the compact urban model across Scotland but also focuses on the *delivery constraints* associated with this policy (in Glasgow, especially, but equally applicable in the west of Scotland).**
- 4 Coordination and governance structures may need to change to enable this to happen at scale. The Clyde Mission project may be best suited for this task.**
- 5 Commit to an acceleration in eliminating urban VDL including a focus on tackling long term sites.**

Scaling Compact Urban Form

The compact urban form concept is equally applicable outside of Scotland’s major urban centres. Indeed, Scotland has a long history of dense urban settlements. Future development will need to be less resource intensive to build as well as less intensive to sustain (future proofed). Across our urban settlements we have gradually accepted that place matters in design. Fitting in buildings to the existing townscape is more commonly practiced than at any time in the post war period. However, it is new settlements where context is missing that the stark differences are revealed in terms of aesthetic values, but also at the most basic level of accessibility and livability. Thus it is imperative that new urban forms can be scaled throughout the country from Aberdeen to Fort William.

Adaptation for Flood risk

Future, sustainable, places need to manage rainfall closer to where it lands – including re-using it, where possible. This helps to attenuate the impact of rainfall on the drainage system, which reduces flood risks / impacts both for new and existing development.

Reducing flood risk will have significant beneficial impacts in terms of carbon associated with the recovery from flooding, and the mental health and wellbeing of communities that already live with flooding.

The planning system should be much stronger in its requirement for the delivery of sustainable blue-green interventions for surface water management – both for new build / regeneration, as well as enabling interventions to reduce existing flood risk.

Due to the uncertainty and challenges of the climate emergency, the Planning system should also require the use of adaptation pathways when planning interventions. This would ensure consideration of multiple possible futures, and allow analysis / exploration of the robustness and

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flexibility of various options across multiple futures. This reduces risk of 'lock-in' to unsustainable decisions that lack potential to adapt.

Governance

The Infrastructure Commission findings have confirmed that Scotland's infrastructure delivery model needs to be addressed and this will be vital to deliver a step change in outcomes. Coordination between stakeholders will be essential to change the current infrastructure delivery paradigm. What is also required is a vision for the future of the country that has buy-in between stakeholders with often conflicting priorities. Climate change focuses the long-term goals of society and thus needs to be central to all institutions' efforts to realize the benefits of acting sooner than later and doing so in a coordinated way.

2 How can planning best support our quality of life, health and wellbeing in the future

Current Position

Clearly each of these factors have been given far greater prominence in the new Planning Act and represent National Outcomes in the NPF. Quality of life, health and wellbeing have permeated into Planning policy over recent years and many LDP's are recognised as containing constructive statements and policy positions in terms of health outcomes as highlighted in the Government's efforts to reinforce collaboration between Health Boards and Local Planning Authorities.

Despite this positive step, it is highly likely that a review of planning decisions in recent years would cast some doubt over whether the amount of weight given to quality of life, wellbeing and health outcomes actually reflects the importance national and local documents give them. It is encouraging therefore that the prominence given to health and wellbeing is higher than ever and hopefully the alignment with Public Health Scotland around how the planning system can play a tangible role in health will assist.

Place Based Approach

Critically this direction is entirely consistent with the new Purpose of Planning and the alignment with National Performance Framework Outcomes, as set out at the start of the response, where health and wellbeing are considered as core National Outcomes. How this translates practically to what the planning system can do is inevitably best approached from a Place perspective. The different functions and services of urban and natural environments that all contribute towards our quality of life and physical and mental health are all inter-related and are all components of the overall quality of place.

These components reflect different functions including our housing, public services such as education, health facilities, open space and green infrastructure, as well movement networks and access to services like water, waste digital connectivity, all of which also represent infrastructure as set out in the National Definition. However, the inter-relationship and management of these all affect how successfully they combine and perform to serve communities and individuals. This means that the opportunity we are afforded to access employment, to benefit from social contact, to access natural environments, to learn and be comfortable and safe are all dictated by these individual components. The role of the planning system in how these different services are protected and delivered is considerable but it also is clear that planning has the key control in determining how these services are located, distributed in most significantly, the spatial relationships and functionality between them all.

This is where the concept of placemaking becomes most relevant. Rather than merely looking at physical form and function in isolation it becomes vital to evaluate the overall function of a place and the range of different services that serve the community that inhabit and use that place. (the detail of how the components perform and are managed individually is given more focus in question 4)

Places that serve communities with many of these components provided accessibly are the most likely to reinforce behaviour that supports healthy outcomes. Where this is the case people will be more likely to walk to destinations and services, be more likely to earn a fair income and have a

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stimulating environment and build stronger emotional relationships with their place and the community that inhabits it.

This reinforces the need to evolve a system that is better suited to responding holistically to the characteristics and needs of a place and its community rather than addressing delivery of specific components of place in isolation.

A case in point where there has been a failure in the delivery of the planning system is disaggregating land uses and focusing upon the quantum of delivery. The most telling example is housing delivery which has been informed by an overarching priority of delivering a target number of units. This long term focus has seen examples throughout Scotland where other necessary and policy-based outcomes have been set aside and the core focus placed on delivering units. Consequently large developments have emerged in poorly connected locations, exclusively delivering housing, often along with sub-standard green infrastructure insufficient to serve the new residents. The consequence has been a community that is utterly dependent on the car to access any services and too often poorly served in the ability to access those vital components that determine the strength of a community and positive characteristics of place that ultimately improve health and wellbeing.

NPF4 must, therefore, reinforce the emphasis given to delivering successful placemaking and applying the place principle. However, it must also ensure that all other policies that inform decisions are aligned to achieve this, in accordance with the new Purpose of Planning. Therefore, NPF4 must establish a position whereby targeting delivery is not seen as a means to dilute the importance of delivering on all of the National Outcomes.

► Recommendation:

- 6 **NPF4 to reflect the Purpose of Planning to give weight to all NPF outcomes in a holistic way**
- 7 **NPF4 to effectively focus on place outcomes and ensure these cannot be outweighed by other discrete policy outcomes.**

Vacant and Derelict Land

How the Place based approach informs the spatial direction of new development is critical. Throughout towns and cities and in particular in the Glasgow City Region, it is the case that there is a considerable amount of Vacant and Derelict Land that remains undeveloped, dispersed throughout communities and neighbourhoods as well as concentrated in strategic locations including the River Clyde Corridor. This represents both a challenge and an opportunity. The harm VDL creates in terms of health and wellbeing are well understood and set out in the Scottish Vacant and Derelict Land Survey and other documents, particularly where it has existed for a period of decades and generational problems persist. However, the potential to concentrate new development and regeneration on such sites is an incredible opportunity to catalyse a place based regeneration that will deliver the homes and other components described above to reinforce existing communities and help to sustain and support existing services and facilities that in turn support new communities.

The challenge in achieving this is that VDL sites are often not seen as attractive to the development industry being considered as non-marketable and therefore dismissed as opportunities. Ultimately this represents a market failure, and while significant investment does take place via public investment programmes, the scale of the challenge persists.

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If NPF4 is to reflect the realignment of the Purpose of Planning and deliver the right development in the right places, emphasis and effort must move to looking at how to support development on VDL at scale to support the delivery of healthier and more sustainable places. This will involve remediating where necessary, preparation through a co-ordinated infrastructure first programme and overall, the foresight to recognise the opportunity such investment would realize.

The scale of addressing the challenge is considerable. The failure of the National Infrastructure Commission to recognise the role of Vacant and Derelict land or brownfield land in the role of transforming infrastructure delivery was disappointing. However, this must not take away from the key challenge and opportunities investing in VDL represents. A national scale and co-ordinated effort to regenerate VDL that builds upon work that has progressed in recent years will rely upon the re-direction of investment. However this is viable while still supporting the aspirations of National Outcomes.

One opportunity to boost investment in VDL would be to redirect spending based upon analysis of the budget against the aspirations of the NPF. One option that this could identify is to reduce spending in unsustainable transport infrastructure that fails to align with climate emergency priorities. This could serve to support a shift towards delivering better connected places, thereby removing the need for large scale roads investment.

It is the case that investment of billions of pounds has taken place in order to cut a small amount of minutes off journey times. (Raith Interchange, EGIP for example). However, as illustrated in Ian Docherty's NPF4 Think Piece Paper, delivering infrastructure to support travelling further, rarely translates into benefits for communities. Therefore NPF4 must take a lead in making sure that budget investment actually reflects policy commitments to support achieving the National Outcomes.

It could be that the River Mission (covered in detail in question 4) could provide an initial spatial opportunity to direct this refocused investment. The scale of the VDL challenge in Glasgow and the city region means that such a redirection of investment would undoubtedly be in the long term public interest not only locally but nationally as it would translate to a considerable preventative spend in terms of health and infrastructure costs in the longer term.

► **Recommendation 8: NPF4 to identify Vacant and Derelict land as a thematic priority to inform budgetary decisions towards supporting sustainable development**

Other Interventions

While there are overarching priorities in delivering better places and tackling vacant and derelict land to improve health and wellbeing outcomes, there are multiple ways planning can improve on health and wellbeing outcomes. Some of these are reflected in the following ambitions and interventions for informing the production of NPF4:

- As part of place making and place mending opportunities need to be provided for urban populations to engage with nature on their day-to-day lives, providing benefits for mental health and wellbeing.
- ecosystem services - new development should deliver biodiversity net gain and biodiversity should be retrofitted into other areas where viable. This is something our new Open Space Strategy seeks to achieve and is an ambition that should go to the heart of NPF4.

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- Delivering for the housing needs of everyone is an important target and includes the need for good quality accommodation. However, it is vital that this is done on an evidence based approach. The needs of the population (reflecting the range of demographic and specific need circumstances) should be established through evidence gathering and comprehensive input through engagement. If this Call for Ideas does not garner views from all elements of the population, further targeted work will need to be undertaken to ensure these views about housing needs are properly reflected. Thereafter, it is vital that any policies or targets are only prepared on the basis of that evidence.
- Air quality must be given greater emphasis in the Planning process. Vulnerable and disadvantaged people are disproportionately affected by the impacts of poor air quality. It is vital therefore that Impact Assessments of the NPF4 are thoroughly tested in terms of managing harmful impacts but also emphasising opportunities to manage health impact. It is also critical that greater emphasis is placed on Planning Authorities to undertake necessary action, supported by effective resourcing.
- Green Networks should seek to connect not only other elements of the green network, but also expand to link housing areas wherever possible, with town centres and employment locations in order to provide the opportunity to better access these places, particularly by cycling. By connecting housing with more types of places, green networks can contribute to climate change mitigation, health and habitat improvements and food growing opportunities,

Other positive aspects of places working effectively that can nurture health and wellbeing and must therefore be prioritized include:

- well maintained streets and public spaces
- feelings of safety
- opportunities for local food production
- street and urban design
- effective public transport
- having places to meet people
- a sense of belonging and a sense of control
- thriving communities with an abundance of local businesses and good access to job opportunities.

In contrast negative aspects of place that must be avoided can include:

- feeling unsafe
- high traffic volumes
- poor air and noise quality
- lack of public transport links
- lack of contact with other people
- poor access to services and shops
- poorly maintained streets and public spaces
- being near to derelict land and sites of pollution.

The extent to which a place exposes its community to either positive or negative aspects of place has a bearing on overall wellbeing and mental and physical health. The disparity between experiences of these positive and negative effects in different neighbourhoods illustrates the way in which the built environment can lead to health inequalities. This becomes polarized, as in Glasgow, where negative

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environments combine to create a cyclical harmful impacts that become extremely challenging to overcome. Therefore aligning place outcomes to NPF outcomes must be at the heart of NPF4.

Effective Engagement

As a final but extremely important point, the role of communities in this process must be embedded. We have set out some of the directions and priorities to be focused on in delivering health and wellbeing. However engagement with communities, who are the experts at living in their neighbourhoods, will also be vital in informing the approach towards regeneration. This is particularly the case where an aspiration towards compact urban form means that new development will take place adjacent to existing communities.

There are clearly vital tools like the Place Standard that can guide this process along with the need to reinforce obligations to engage in both Development Planning and Development Management regulations. However, it would be beneficial if the co-ordination of this engagement was led by the local policy context which sets out the spatial strategy and is based upon local context, circumstances and indeed knowledge in the preparation of LDP's. Funding programmes controlled at national level, (RCGF, Sustrans, Charrettes) while boosting local ambition don't always align with how local place planning and priorities need to be focused. This has led to distraction and diversion of focus away from those areas that are of greatest need in terms of delivering healthy neighbourhoods and tackling long term health inequalities. Therefore there must be more confidence to allow authorities to guide how these investments are directed to ensure alignment with spatial priorities.

► **Recommendation 9: NPF4 should inform a decentralized approach towards directing and resourcing key spatial engagement to ensure alignment with local spatial strategies.**

3 What does planning need to do to enable development and investment in our economy to benefit everyone

The NPF outcomes set an aspiration that the opportunity to earn and the wealth that it creates are shared more equally, that transactions and consumption are equitable and that people are not disadvantaged in accessing these. Of equal importance from the Act is that the economy achieves this in a way that facilitates good health and wellbeing and does not create harm to the environment, and preferably supports and enhances it.

A key challenge in promoting the environmental and wellbeing outcomes is that the current economic system has reinforced inequality, typified in Glasgow and in the City Region where there is a disproportionately high level of population in multiple deprivation. Given this context and the immediate disadvantage created by a lack of income and opportunity it is easy to see why priority is given to economic outcomes and how these can often influence decision making more than other outcomes that are established in the NPF.

At the same time, the role of planning has been diluted and is often restricted to facilitating the market meaning its role in the delivery of sustainable economic growth has focused disproportionately on the short term economic outcomes.

It is vital, therefore, that spatial development decisions do all they can to accommodate all elements of how we measure a successful economy. But it is also vital that this is consistent with other investment decisions in how Scotland achieves those national outcomes and operates in 2050. Without a coherent and co-ordinated realignment of all drivers of the economic system, this realignment of the planning system for a re-imagined economy will be an isolated and ineffective exercise.

It is therefore welcome that the Scottish Government has signaled its intention, through various policies, such as the National Performance Framework, and national projects, such as the Scottish National Investment Bank, to move the country toward a new era that promotes the broader ambitions and outcomes in driving the national economy.

Before looking at the scope of the planning role in the future economy, it is recognized that it will be difficult for planning decisions to influence equity in terms of earning and wealth in a direct way. However, planning can play a pivotal role in how economic development is supported and how the population can access the opportunities to earn income which should all help to support a more inclusive economy in alignment with other economic levers. Furthermore, planning clearly has a key role in directing how economic activity affects wellbeing and sustainability outcomes through directing development and supporting positive and accessible working environments as well as restricting harmful activities.

Scotland's Future Economy

We must acknowledge that we will not be able to predict what the economy will look like in 30 years. The nature of technology, social and political factors will make it difficult to forecast what the structure of economic drivers and breakdown of employment will be. However there are some factors we can use to at least guide the short to medium term steps. These include:

- The need to mitigate for and adapt to climate change and the ecological emergency

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- The changing demographics of the population with more older people than ever
- The changing face of retail and impact upon our town centres
- The poor level of productivity nationally
- The high level of graduate educated workforce, particularly in our cities; and
- The opportunity for renewable energy and potential of our other natural capital.

This list of factors highlight a few things. Firstly we have to address deep rooted challenges if we are to achieve a fairer economy. Secondly, the nature of our economy is going to be the subject of change that we have little control over but that we can at least anticipate. Thirdly, we have to capitalize on the assets we have to help us address the future.

Connecting People to Economic Opportunities

Planning must be responsive to how the different factors that influence the economy evolve. However this can be done in a proactive way by preparing for what factors we do know about and acting with the tools we have.

Accessibility to opportunity is vital to tackling inequality and low productivity. The inability to travel due to time or costs limits the most disadvantaged in terms of accessing employment, training or education thereby restricting options for the future. There is therefore a need to increase the opportunities to distribute employment to sustainable locations throughout communities. This means furthering the support of diversification of town and local centres to accommodate businesses providing jobs and institutions offering training and learning. As well as improving access to employment and training this can support improving the level of skilled employees in the economy thereby boosting our low productivity levels. In addition this will also serve to support our centres as they go through the challenges of the change in retail activity and face more empty accommodation.

This approach could also translate to shifting a focus away from employment zoned land which is often located in areas that are often less easy to access by sustainable modes of transport which compounds both their poor accessibility to disadvantaged residents but also increases reliance on private vehicles. Therefore redirecting more jobs and training to sustainable centres could lead to positive outcomes including an improvement in public transport patronage sustaining and promoting its use, along with providing more stimulating working environments.

Glasgow would certainly benefit from such a direction with a high number of Economic Areas identified and having already committed to an intention to rationalise how these are used in order to maximise the productivity of our sites.

► **Recommendation 10: Explore the promotion of employment activities to town centres in preference to employment designated lands and the repurposing of employment sites**

Flexibility and Adaptability

The West of Scotland has seen the risks of having a disproportionate reliance on a limited set of industries. As inevitable changes in economic drivers occur this can lead a risk of mass unemployment as experienced through demise of shipbuilding on the Clyde. These factors compound the frailties of global economic performance meaning that an economy is more

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vulnerable to impacts than it needs to be. Accordingly, it is vital that Scotland's economy can target as broad a range of economic activities as possible to support a resilient economy that will withstand the sudden changes our economy can bring. Planning can support this by broadening the scope in what economic activities it will seek to support. This can be reflected by widening the locational options for accommodating new business, including in town centres and moving away from overly restrictive land use policies that limit a sustainable mix of development to accommodate compatible business activities in most locations. This would need to be aligned with national and local economic strategies, but if planning policies can demonstrate as broad a capacity as possible to accommodate a range of businesses, then the more effective it will be in supporting inclusive and resilient economic growth.

In tandem to this, while focusing on growth sectors makes sense in terms of attracting new growth and attracting highly skilled workers, which Glasgow is proving adept, this must not exclude the prospects for the entire working population to access a range of opportunities. Therefore the potential for inward investment that will support local employment and can contribute towards sustainable outcomes should be supported irrespective of whether they satisfy align with specific ambitions. What is more important is that they are attracted to the most sustainable locations that make that as accessible as possible.

► **Recommendation 11: NPF4 to support a move away from land use restrictions to support more flexibility for employment generating uses.**

Capitalising on our Assets

Scotland, like any other brand, relies on authenticity. If Scotland is to be an attractive proposition then it must make the most of its existing assets which are what makes it unique but are also in natural abundance. The strength of degree educated workforce in Scotland and in Glasgow and other Central Belt Cities and towns makes it a Research and Development opportunity that will appeal to high tech businesses. This is reflected in Glasgow's competitive status in attracting foreign direct investment.

At the same time, as the global economy strives to adapt to the effects of climate change, our strength in natural capital and resources will maintain our resilience and capacity to support economic activity. Therefore this is a context that must be valued and protected as a valuable commodity going forward.

Both of these factors reflect strengths that are to be nurtured to support an overall drive towards establishing as broad a range of employers as possible, both spatially and sectorally. This breadth will serve to increase the range of opportunities available but also allow us to sustain these opportunities in the longer term making us resilient to economic change.

► **Recommendation 12: NPF4 should support the identification of social and physical assets to direct and prioritise how policy supports economic growth.**

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Planning for Sustainable Economy

If the future economy is to support the broad outcomes of sustainable development, it must maximize opportunities for repurposing of our existing assets. In planning and building standards terms, this will require new approaches to building and retrofitting to allow our built stock to be capable of accommodating future business. However, this is by no means an insurmountable task and we are already seeing the scope to carry out high performing retrofitting to vastly improve sustainable performance in existing buildings. The imperative to adapt will undoubtedly see improvements in providing flexible accommodation to meet the needs of future occupiers too.

The Scottish infrastructure Commission has included in its recommendations a 'Fabric First' approach to be applied that utilizes existing facilities and assets wherever possible. This will potentially constrain our ability to direct development to new locations if we promote the re-use of existing facilities, however this must play a role in supporting a circular economy. Furthermore, by adopting a flexible approach to where and how we accommodate employment uses (particularly within town centres) then these principles could be mutually achieved.

Part of this alignment must also recognise that cranes do not automatically translate to great news, although cranes delivering the right development in the right location are certainly good news. One option could be to borrow from the sequential approach whereby developers are expected to rule out viable options for conversion and repurposing existing buildings in a proximity before they are able to construct new development. (This may need to align with a change in the Prior Notification requirements to illustrate alternative options have been investigated). This will need to be a balanced methodology and might give weight to requiring greater evidence on need before the demolition of any building. It will also involve a substantial rethink about how landowners can seek to develop their land. In essence, the planning system will have far more control over how new development is directed rather than the market and the circumstances of land ownership.

► **Recommendation 13: NPF4 should support the re-use of existing buildings to support new economic activity and should explore a sequential approach to support this.**

4 How Can Planning Protect, Improve and Strengthen the Character of our Special Places.

Different places serve different roles and functions and planning has a role in supporting all of these. Many types of environment are already afforded protection in recognition of their important status, be it historic or environmental significance, others play key roles in serving day to day needs like town centres or open spaces while some play a role in protecting us through delivering ecosystem services. As outlined in question 2, the inter-relationship between all of these and many other components of our habitat all dictate how successfully a place functions.

Many of these places have characteristics that serve to support the outcomes in the first three questions (climate change, health and inclusive economy). However, the opportunity to consider their operation individually allows for specific examination of what they offer, how they operate, how they are protected or supported and from this and how NPF4 should protect improve or strengthen them.

River Clyde (Clyde Mission)

For Glasgow there is perhaps one place above all others that has been regarded as being of significant importance in recent years in terms of the performance and success of the city. Following increased focus through the City Development Plan and with regional recognition of its potential role and existing and emerging challenges, the River Clyde now been highlighted as being of national significance through the creation of the National Mission. The justification for this status is through the need to manage the immediate effects of climate change and also to support and co-ordinate multiple opportunities the river and its surroundings represents. It is important to emphasise also, that not unsurprisingly these opportunities align well with the outcomes in the NPF.

Data from Glasgow City Region demonstrates that the immediate River Clyde Corridor (in that case using a 500 metre margin) contains a population of 115,000 people and is the location for 21,000 companies supporting 158,500 jobs. At present the majority will be drawing energy from the national grid. However the River Clyde has significant potential as a source of renewable energy both in terms of Water Source Heat and Tidal Energy. The Queen's Quay Heat Pump Scheme being delivered by West Dunbartonshire is being taken forward as proof of this concept

The River Clyde Corridor flows through the centre of the Glasgow City Region passing through densely populated urban areas in South Lanarkshire, Glasgow, Renfrewshire, West Dunbartonshire and Inverclyde. At this location the Clyde is dominated by tidal dynamics and as a result will be impacted by rising sea levels driven by global carbon emissions. Work is ongoing to quantify the potential impact of rising sea levels. SEPA has provided guidance on Climate Change allowances to be used for the purpose of Flood Risk Assessment (+850mm to 2100 and +150 for every decade thereafter) Inclusion of these figures suggest that a 1:200 coastal flood event in 2100 would have a considerable physical and economic impact in the Clyde Corridor.

A policy of 'Managed Retreat' from the River Corridor would appear to be practically undeliverable given the number of different properties and ownerships involved. This is particularly the case given the location of the City Centre which plays such a key role in the operation of the regional and

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national economy (see below). The 'Managed Retreat' approach would also have significant environmental consequences with properties relocating from existing urban areas that are generally well connected to the region's strategic transport network to less sustainable locations within greenfield locations, entirely at odds to the compact city form and place based ambitions set out in question 2. It is essential, therefore, that NPF 4 should promote a long-term staged intervention ('Adaptation Pathway Planning') to reduce future risks associated with a coastal flood event. In the short-term this approach should focus on deliverable, low capital cost interventions such as the use of Green Infrastructure to provide additional flood storage capacity within the Clyde Corridor. In the longer term focus should be on delivering a strategic flood defence in the form of a tidal barrier/barrage. The delivery of a tidal barrier offers the opportunity to incorporate technology that supports the generation of renewable energy.

While this intervention will support the creation of a stable adaptation, it should also support and stimulate a co-ordinated approach towards how the river is seen as a cohesive and functioning place. There are deep rooted market failures and wider challenges that constrain activity in the delivery of holistic waterfront regeneration and allowing Glasgow and the City Region to capitalize on having such a valuable asset running through it. To achieve this, key factors must be addressed including the need to:

- stimulate development in areas where it is presently constrained by the costs of remediation, site access or other issues;
- provide high quality and effective links along both sides of the River Clyde, between the City Centre and the West End, and between business and research clusters, key institutions, existing and planned visitor infrastructure, and residential communities; and
- maintain and enhance the quality of this part of Glasgow as a place to invest, live and work in, with a focus on 'gateway' routes and entry points for the areas main business, cultural and institutional facilities.

Glasgow City Council has recognised this opportunity and the river corridor is already the location of City Deal Investment in terms of the Water Front project as well as producing a River Corridor Strategic Development Framework (SDF) and a Govan Partick SDF as pieces of spatial statutory Supplementary Guidance which have now been submitted to the Scottish Government for approval before being formally adopted and becoming part of the Development Plan for Glasgow.

The City Deal project area has a number of economic assets, these 'key anchors' will be used to drive sustainable and inclusive economic growth and tackle physical and social deprivation within waterfront communities. Through adopting a strategic and holistic approach to waterfront regeneration, the project will:

- Contribute to increased GVA across the city region;
- Facilitate regeneration of vacant and derelict sites within the locality for employment and housing purposes;
- exploit opportunities offered by the QEUH and Glasgow University to enhance clustering and stimulate growth in the Life Science and Further Education sectors and to further connect to and maximise the benefits of existing high value added industries in the locality; and
- spread the benefits of the City Deal investment to reduce the incidence of multiple deprivation particularly in Govan.

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The River Clyde Development Corridor SDF establishes the following vision:

“Our vision is for the River Corridor to become a vibrant, inclusive, liveable and well-connected place. It will be a world-class destination at the heart of the city, with an accessible waterfront and attractive spaces where people want to spend time. It will be climate-resilient and support a mix of uses. New houses and flats will be linked to existing neighbourhoods. The historic character will be protected and enhanced, while innovative design will help create a distinct identity. The River Corridor will form part of a wider network of urban waterways, will support continuous walking and cycling routes, and will be celebrated as the city’s largest, continuous open space.”

As part of this process, the following overarching priorities have been identified:

- Recognising the River Corridor as a major regeneration project of national significance;
- Unlocking sustainable development along the River Corridor by addressing immediate challenges, and developing a long-term, responsive approach to manage the predicted increase in flooding in future years;
- Promoting a design-led, placemaking approach to enhance and protect the townscape, heritage and environment of the River Corridor while delivering a well-connected and liveable city.

Govan-Partick SDF

The SDF establishes the following vision:

“By 2030 Govan-Partick will be recognised as an urban district of well-connected but distinct neighbourhoods, which provide a very high quality of life, creating a context for nationally significant economic development and for a narrowing of social inequalities. The area will become recognised as a leading Innovation District, where technical excellence contributes to inclusive growth and building a liveable place. The City Council, partner agencies and the wider network of stakeholders will share knowledge and resources to affect a fundamental shift over the next decade in the image and performance of this city-district. This process of change will benefit all of the community and will contribute to the overall social and economic success of the city-region.”

The following overarching priorities have been identified:

- To create the spatial conditions for a new era of economic development, building from the strengths and unique innovation assets of the place while defining a strategy for post-industrial evolution.
- To nurture the social structure of the place, building on the strengths of existing communities and world-class visitor attractions
- To layout a framework for the transition of the area to become an exemplar of a connected low carbon place, where the urban structure promotes wellbeing
- To provide the spatial framework to support the partnership structures required to deliver these priorities over a 10 year period

In addition to those assets and opportunities in the Glasgow City Council area, we would draw attention to the list outlined in the Indicative Regional Spatial Strategy that serves to reinforce the importance of the river as a clear candidate for National Development status.

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It is clear that the context of the river is that there are substantial challenges in protecting assets from the effects of climate change to support the delivery of both a compact city and reinforce the role of the city centre at the heart of the region. Decisive forward thinking has been undertaken to map a coherent path towards delivering a sustainable and successful future for the River, which illustrates there is credible commitment and momentum to advance this project. However, the scale of the challenge clearly spans beyond Glasgow City Council and success will rely on a collaborative approach among all public and private stakeholders. Giving the River Clyde national status within NPF4 will play a key role in supporting the successful delivery of these aspirations to benefit, not only the Glasgow City Region, but all of Scotland in achieving the national outcomes in accordance with the Purpose of Planning.

► **Recommendation 14: NPF4 should identify the River Clyde as a National Development to support Clyde Mission and direct addressing climate challenges and co-ordinate sustainable regeneration opportunities.**

Open Space and Green Infrastructure

The role of Open Space and Green Infrastructure are vital in delivering the broad range of outcomes as set out in the Council's recently adopted [Open Space Strategy](#). Health, economic and social impacts are all derived from effective open space and it is very encouraging that the Planning (Scotland) Act 2019 places an obligation on authorities to produce an Open Space Strategy and ties this to Development Planning.

The benefits of food growing, enhancing biodiversity, supporting sport and recreational use of open spaces as well as the capacity to capture carbon and support a resilient and more liveable environment are all provided by open space as articulated in the detailed Strategy.

Of vital importance is how innovative approaches towards delivering the ambitions of protecting, supporting and benefiting from all our open spaces are being developed. This is illustrated through the Council's partner role in EU Horizon 2020 which is designed to embed Nature Based Solutions throughout the preparation and delivery of the Open Space Strategy's Delivery Plan. The intention is to embed multiple benefits including enhancing biodiversity in how we manage our Open Spaces to maximise the long term benefits in the broadest terms. In the longer term it is hoped that once established this NBC approach will be adopted and developed throughout more Council strategies and plans and it should be noted that it is already helping to inform the production of the Glasgow Indicative Regional Spatial Strategy.

While the Glasgow OSS maps an ambitious and innovative plan leading to 2050 for how we use, managed and benefit from open space, there needs to be a change in the budgetary context if it is to be achieved all of its ambitions. In the current financially constrained climate it is a major challenge to ensure the investment needed to translate all that open spaces can offer into the tangible long term public benefits. As part of the realignment of public finances promoted throughout this submission it is essential that the longer term opportunities presented by open spaces are recognised and acted on, particularly as these clearly match the Purpose of Planning and deliver national outcomes through capitalising on the value of our natural capital. This underlines again the vital context that the NPF4 must not be produced or implemented in isolation and must act as a lever towards co-ordinating all key decisions in delivering our national outcomes.

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► **Recommendation 15: NPF4 should promote the importance of green infrastructure delivery and protection and consider incorporating a Nature Based Solutions approach to policy development.**

Historic Environment

At national level the role of the historic environment is one of character and identity and illustrating what special places mean to us as a population. The over-riding ambition of protection and enhancement is the correct approach to value and retain our historic environment for as long as possible.

While conservation areas and listed buildings are rightly a focus for protection, the historic environment goes far beyond these contexts and must also be recognised for the role it plays.

The National Outcomes recognise the importance of valuing our built environment in promoting high quality expectations for housing, connectivity sustainable planning and design. However, the monitoring indicators go further, in particular looking at pre 1919 housing stock condition. This is a vital measure of how we value our historic environment in going beyond the elements that are already afforded protection, by considering how we value and protect the housing infrastructure that characterises so much of our urban form throughout Scotland.

It is this stock that possibly requires urgent attention as the condition has deteriorated over time and the scale of maintenance requirements and need for investment grows. To establish a clear picture on this the Council has undertaken a survey of 500 units and is currently evaluating the results to prepare reports and budget estimates. The direction suggests that it is vital that NPF4 addresses this challenge going forward if we are to retain the special character that our pre-1919 stock creates in our towns and cities. Therefore, it would be a welcome intervention to see a strong commitment to how a collaborative approach to protecting and supporting this stock can be embedded.

The Network of Centres

The role of the network of centres has had to evolve as out of town retail and internet shopping along with changing behaviours have all impacted in how we use our centres. Policy has evolved at the same time and has been responsive to changing demands. In Glasgow we recognise that the network of centres represents a series of sustainable hubs that support their catchment communities providing access to goods and services as well as a means to accessing employment and supporting interactions. Ensuring these are as accessible as possible to all members of community is therefore vital to supporting health and inclusivity as well as opportunity, all of which are key National Outcomes.

NPF4 should seek to support new development at density where possible in proximity to centres. It should recognise that proximity need not be limited to “on the edge” or perhaps even traditional walkability distances of 500m (see Transport section in question 5). But should give weight to new development that can introduce population to support town centres and bring population closer to the services and facilities town centres provide. This should then inform how mobility infrastructure provision can be directed towards promoting maximum accessibility to population, particularly in its most sustainable forms.

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This will require stronger emphasis towards the role and spatial importance of town centres than currently appears in SPP. It should also include consideration of whether Commercial/retail Centres should retain their status and whether their imposed reliance on car borne journeys are really the most appropriate approach.

It would also be helpful to recognise the different roles of town centres in different environments. As questioned in the SPP supporting propositions, a rural centre will function differently to an urban centre and the scope to apply different principles and priorities to these different circumstances would be beneficial. Therefore, this flexibility should be recognised in the drafting of NPF4.

It would also be worthwhile exploring what other ways the role of town centres could evolve, particularly where they do play a role within a network and populations can access goods and services from a range of centres. While current SPP currently suggests this approach it may be beneficial to actively promote more innovative ways of thinking about how a specific town centre could operate within a larger network and catalyse regeneration and vibrancy. For example, could a place based analysis and health check inform a completely refreshed approach towards how uses are managed and directed in a bespoke manner for that centre to evolve it to a new role within the network.

In order to align with the health outcomes outlined above it is desirable to pursue further green infrastructure delivery within town centres, either through public investment or by co-ordinating developer contributions. As outlined above, town centres should play a pivotal role in enhancing place quality and therefore it makes sense to maximise investment in urban design solutions and in opportunities to meet and play to attract people to use and value their centres.

- ▶ **Recommendation 16: NPF4 should consider how it directs high density development in proximity to town centres to maximise sustainable access to services and facilities.**
- ▶ **Recommendation 17: NPF4 should reconsider the support provided to commercial centres and retail parks given their unsustainable role.**
- ▶ **Recommendation 18: NPF4 should encourage greater flexibility to evolve how a particular centre operates where the network of centres would still ensure accessibility to services.**
- ▶ **Recommendation 19: In alignment with infrastructure prioritisation for green infrastructure delivery, NPF4 should proactively promote the enhancement of town centres through creating new green infrastructure.**

Glasgow City Centre

The city centre is the principal focus for culture, creativity, innovation and prosperity generation at the heart of Scotland's only metropolitan region. As a key driver of the regional and national economy, protecting and enhancing this role and contribution is of national interest.

While city centre's reinvention over the last thirty years is a world renowned example of regeneration, there remain prevailing challenges around social and health inequalities and persistent vacant and derelict land and buildings. A step-change in the scale and pace of transformation of the city centre's physical environment will be needed in order to address these deficiencies, sustain the centre's future economic competitiveness and respond to the urgent demands of climate change in transitioning towards a zero carbon future.

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The **Draft Glasgow City Centre Strategic Development Framework (SDF) 2050** articulates the spatial ambitions for the future development and adaptation of the centre and establishes the following vision:

“In 2050, the city centre will be a more vibrant, inclusive, sustainable and liveable place. A green, attractive and walkable city centre will create a people-friendly place that fosters creativity and opportunity and promotes social cohesion, environmental sustainability and economic prosperity.”

The SDF asserts that the city centre’s ‘place quality’ needs to significantly improve if it is to attract residents, investors, workers and visitors in future as well as become climate resilient. Place improvement interventions are proposed under six place ambitions to:

- Reinforce the centre’s economic competitiveness –supporting the changing needs of business, responding to retail landscape, diversifying uses through a placemaking approach
- Re-populate the centre and improve liveability - promoting growth and reinforcing community to foster health, wellbeing and social cohesion
- Reconnect the centre with the river and surrounding communities to improve access to opportunities in and around the centre for all and address the negative impacts of the M8
- Reduce traffic dominance and car dependency and create a pedestrian and cycle friendly centre, with improved public transport, that is healthier and cleaner
- Green the centre and make it climate resilient with a network of high quality public spaces and green/blue infrastructure that caters for a variety of human and climatic needs
- Repair, restore and enhance the urban fabric, reinforce distinctive heritage and character

The future transformation of the city centre will involve significant adaptation and retro fit in the public interest; in public space creation, streetscape reconfiguration and installation of climate resilient infrastructure and so on. This will require multi-sectoral collaboration and partnership - between Scottish Government, the City Council, key agencies, city institutions, business and investors, and all who live, work and visit the centre - to ensure creative, joined-up, aligned and integrated change. National policy support will be crucial to signify intent, reinforce the status and role of the centre and galvanise partners around a unified improvement vision (as within the SDF). The public sector will need to demonstrate strong leadership in coordinating the delivery of the vision, using policy and other resources (including future financial resources) to lever private sector and other partners’ contributions and ensure sustained commitment to holistic and sustainable change.

- **Recommendation 20: NPF4 should recognise the unique role of Glasgow City Centre and support its ongoing transformation as a national spatial priority.**

5 What infrastructure do we need to plan and build to realise our long term aspirations

The preceding answers set out how planning should approach some of the challenges facing Scotland and highlights spatial priorities for Glasgow along with thematic priorities that exist in Glasgow but are replicated nationally. Consistent reference has been made to the need for national co-ordination with various professional disciplines outwith planning to make these outcomes viable. This will depend on budget allocations that are supportive but ensuring there is a consistent message spanning all disciplines about how these planning priorities can clearly translate to delivering national outcomes will also be vital.

Generally the recommendations for how NPF4 can address the different challenges are not time specific, however with investment and collaboration they are all achievable before 2050. However, whether they are delivered or not will also depend significantly on the scale of investment in the infrastructure that helps to realise these long terms ambitions.

It is encouraging therefore, that the findings of the National Infrastructure Commission has focused on clear messages that reflect the approaches set out in the answers above. At the heart of its findings the Commission recognized that the Climate Emergency meant that the drive towards zero carbon must be at the heart of how infrastructure is provided in the future. It also promoted the revision of the breadth of infrastructure provision to include the role of natural infrastructure. It recognised the need to deliver inclusive growth and sustainable growth reflecting national outcomes and that a systems-wide approach towards infrastructure investment and prioritisation should be developed, along with recognition that alignment around both Leadership and regulation is critical, reflecting the need to co-ordinate towards common national objectives. Finally it was extremely welcome to see that “The need to assess all of this in the context of place, and what is appropriate for a given geography has also helped frame the work of the commission.”

In recognition of this close alignment, it is not necessary to repeat those actions and options that are set out by the Infrastructure Commission Findings Report in detail. However, the delivery of outcomes highlighted in the earlier answers do generate the following specific demands for infrastructure.

Supporting Place through Connectivity

The ambition to create better served and more accessible places will be dependent on the right mix of development. However, their success will also depend on connectivity decisions that enable mobility and accessibility for all parts of communities to access the services and goods that are needed, as well as the opportunities for employment. The delivery of better local active travel infrastructure and supporting public transport that provides a range of options will, therefore be vital.

This approach needs to be aligned with a national effort to move away for car borne journeys altogether. While transition to electric or hydrogen vehicles will support reducing emissions they will still generate whole life costs that exceed the impact of alternative options. Therefore a transition to greater public transport through greater local connectivity and accessibility will be of greater importance as a long term approach.

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Investment in Vacant and Derelict Land

The redirection of investment in preparing vacant and derelict land that is deemed non effective by the market is essential to support the compact city model. This will involve remediation and de-risking to support public led interventions to support more sustainable built form.

Where this is in sustainable locations the focus should clearly include housing and the other components that make a healthy place. But it is vital that a balance is also struck to include co-ordinated green infrastructure that is aligned to existing and emerging green networks. Whilst the opportunity to mitigate climate change is there to be taken, a balanced approach towards repurposing these spaces will help to deliver long term public benefits.

Transport

In addition to the need to looking at how connectivity can be supported by focusing on place outcomes, it is worth highlighting some key factors in relation to areas with high accessibility to public transport where it is now observed to be common to approve new development without any car parking or reduced car parking. The transport market is changing and it is noted there is lower demand for private parking in high accessibility areas. However, different matters are emerge:

- We need to make sure we understand the relationship between travel choice and socioeconomic status and understand the reasons why people decide to live car free: “Is it because they don’t want, don’t need or can’t afford a car?” If car ownership/modal choice are essentially affluence matters, we should then be concerned about equity issues and consider the implications of increased incomes on car ownership levels.
- The self-selection effect should be taken into account when drawing conclusions about accessibility and car ownership: we assume that people travel more by public transport in areas with high accessibility to public transport and deduce that, by improving public transport, people do not drive and may decide not to own a car. However, residential self-selection explains how, for example, people who prefer public transport decide to live in areas with high accessibility to public transport. Taking into consideration the self selection bias means accepting that car dependence may simply be a preference. Nevertheless, this should not divert from an emphasis on making alternative, more sustainable options more accessible and attractive.
- In relation to the above, fundamental questions about the nature of planning and its potential in deciding what people should or should not need are raised as summarized by Prof Docherty’s think piece on accessibility.
- Residential self-selection could however simplify some of the complex issues around public transport provision as investments in areas with low accessibility and low car ownership should be prioritized. Understanding where the demand for public transport is crucial to a transition to a sustainable future.

In addition to the comments on connectivity it would be good to see clearer and more specific guidance on car parking standards to stop local authorities being able to pick and choose what to apply and avoid reference to outdated guidance to generally discourage car ownership in years to come. This would align well with the statements above supporting better located development that are easier accessible to essential functions and services.

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In terms of specific interventions there should be clearer guidance on what constitutes a walkable distance and a cycleable distance for new development. There is little national evidence on this and while mobility and capability are clearly relevant and dependant on circumstances, planning for whole population should support an ambitious approach, even taking account of demographic ranges. Transport Scotland's 2030 active travel Vision (not a statutory document, <https://www.transport.gov.scot/media/33649/long-term-vision-for-active-travel-in-scotland-2030.pdf>) states by 2030 journeys up to 5 miles will be routinely made by bike, up to 2 miles on foot. But this needs underpinning in a piece of technical guidance and/or legislation to give it weight and application in development management so that local authorities can require developers to have cycling infrastructure in place for journeys to key destinations say within 5 miles of that development. And do these trip destinations actually need formal definition again to give weight e.g. schools, key employment sites over x no. of employees or by square area, medical facilities, community facilities etc?)

Government guidance should not be on providing infrastructure for trips generated by the development (predict and provide) but a much stronger focus on building infrastructure and services to make the majority of trips by sustainable modes, (tied to a more sustainable urban form) and then the residual private car trips to be mitigated where needed (and combined with some kind of policy test in principle as per my 2nd point above). Hopefully this would end developments where the distributor road is the first and biggest part of the transport response, and instead plan the development around sustainable transport access first and foremost with the private car almost being treated as a "guest"?

Evolving Economy

We don't yet have a clear understand of the relationship between inclusive growth and infrastructure. While the evidence of infrastructure enabling growth exists, the evidence that improving infrastructure translates to more improvement is far weaker. Intuitively, the ability to improve local and sustainable accessibility would reasonably lead to an improvement in opportunity and even if it does not it will lead to improvements in accessing the services and goods that will support and sustain a community as well as improving health and wellbeing. Therefore, these present a reasonable focus for investment.

Heat

The context of long term public interest must be maintained in how we approach tackling heat and transport. The Infrastructure Commission rightly identifies these as the core sources of carbon emissions nationally and therefore as the first priorities in tackling climate change mitigation. However, with extremely ambitious targets set in Glasgow and Edinburgh there may be a risk that short term solutions will be implemented that are simply not sustainable and will lead to longer term consequences for example through the introduction of quick but short lived retrofitted building heating to improve performance.

As the Infrastructure Commission sets out, the vast majority of accommodation we are using by 2050 already exists, so the approach towards retrofitting, whilst important to progress quickly, must not be rushed as we want to ensure that it is long lasting and does not need replacing in the short term.

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Overall Council officers would endorse the approach set out in the HOPS Climate Change, Energy and Resources Sub Committee submission.

Natural Infrastructure

As outlined in relation to Open Spaces and green infrastructure, investment in open spaces to help realize the range of benefits they can provide should be given higher priority as an infrastructure solution. It is welcomed that a net benefit for biodiversity is being explored, however, it would be a very positive step if the concept of Nature Based Solutions were embedded as a core methodology in how planning policies seek to deliver Natural infrastructure that maximises resilience and multi-functionality.

Pre 1919 Housing Supply

As highlighted earlier, the value of the pre 1919 housing supply, particularly in tenements throughout Glasgow is substantial. The tenement stock characterises Glasgow and is world renowned as a recognisable form of housing that must be protected for future generations. Therefore it would be encouraging to see recognition of this in NPF4 and a commitment to supporting the long term retention of tenements.

Digital Connectivity

As an enabler for mobility, digital connectivity has a key role. Current monitoring of modal shares targets as part of existing policies (e.g. travel plans) is not effective. In addition to this, the context of travel plans and residential travel packs is often circumstantial and left to the hands of developer without clear requirements. Both travel planning and monitoring needs to be more effective in making developers accountable for their footprints. The increased use of phone apps for journey planning and the transition to shared transport (via digital devices) may allow us to get greater insights into the way people move about at the residential development scale.

However, the public sector should maintain its leading role in bringing together and advocating for the public interests as private companies are, by definition, inclined to favor private over public interests. This means there is an urgent need for transport authorities to step up and ensure it is them and not the private sectors who will facilitate the bridging between their citizens and multiple emerging transport services. Coordination at a national level will ensure lessons are learned from one city to another and Mobility as a Service is delivered through public channels.

Finally, it is critical digital divides between different socioeconomic groups are addressed. With the increased importance of digital connectivity (especially in this emergency context) there is a risk that some communities are socially marginalized and a digital connectivity programme is required to avoid the widening of existing societal gaps.

In terms of digital infrastructure NPF4 should seek to support availability and access to digital connectivity by setting requirements that fibre is deployed in development sites to maximise connectivity for all. Investment in future proofing digital accessibility now will provide the capacity for accommodating new demands that emerge and would support longer term public interests.

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Whilst potentially beyond the remit of planning, it would be good to see future buildings accommodating greater Smart operation capability to manage building performance, monitoring and communications.

Water Infrastructure

Scotland needs to plan and deliver a network of strategic surface water conduits for its urban areas to receive discharges from new and existing development. This is a challenge for Scotland's urban areas where historic watercourses have been lost over time. This puts additional strain on the existing combined sewer networks which are often the only available discharge location for new development, in addition to existing development discharges that are increasing through urban creep and the loss of permeable surfaces. Existing assets should also be considered for their potential to deliver additional benefits to their core purpose – ie the canal network.

Where new infrastructure is delivered, it should be blue-green in nature, ideally managing water on the surface, to be able to realise the multiple benefits of reducing flood risk, improving biodiversity, improving air quality and reducing urban heat island effects.

Existing drainage assets should be considered for their potential in terms of 'smart' water management – where data and remote automation can be used to provide additional capacity prior to storm events. An example of this is Glasgow's Smart Canal - <https://www.youtube.com/watch?v=MFykgGeee1o>

The potential for 'smart' water management should also be considered for any new development, including at individual property level, where the dynamic management of rainfall in response to weather forecast data can attenuate runoff and mitigate flood risk. This would be achieved by emptying storage tanks ahead of a forecast rainfall event to ensure capacity to collect and attenuate runoff when the storm arrives.

Both retrofit and new smart water management systems, including greywater recycling, will reduce demands on existing drainage infrastructure capacity, helping to both reduce flood risk and provide headroom for new development.

Planning needs to ensure that climate change, and sustainable blue-green surface water management, is considered early in the planning for any new development, and on a strategic basis in terms of retrofit for urban areas – with the aim of delivering infrastructure in a coordinated manner, ahead of development, rather than a reactive, piece-meal approach. A strategic approach should consider the location / potential of vacant and derelict land in terms of both potential to manage surface water and the potential discharges from such sites, and Development Plans should safeguard land to allow space for sustainable water management to both enable new development and reduce risk for existing development.

Retrofit of SuDS is usually expensive and often disruptive, so the planning system should do more to require that any urban realm projects / programmes must consider the opportunities for retrofit surface water management early, to be able to deliver multiple benefits in the most cost effective manner possible.

To become resilient to climate change we believe that there is a need to completely reimagine what an urban street looks like in the future. The aspirations of the Glasgow City Centre Avenues project

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provide an indication of the scale of change to retrofit blue-green infrastructure that is required - <https://www.glasgow.gov.uk/avenues>

Community engagement will be important to communicating the importance of flood risk management interventions, and the multiple benefits of blue-green infrastructure.

Infrastructure Conclusions

All of these propositions have been based upon what the analysis tells us is needed to deliver our place based ambitions rather than what is possible in terms of technological advances in infrastructure delivery. Irrespective of our ability to anticipate them, these advances will happen and will become the norm and will present new opportunities in delivering the priorities that remain. The planning system will need to be flexible enough to accommodate these changes as they emerge through iteration and evolutions.

Overall Conclusions

The production of NPF4 presents an excellent opportunity to recalibrate how the planning system can support delivery of our National Outcomes leading towards 2050. However, it is essential to use NPF4 as a lever to align the other drivers and strategies (National Infrastructure Commission, STPR2, National Economic Strategy) to establish a shared and collaborative context for delivering on our national ambitions. The following factors are vital in how NPF4 provides the right response to these opportunities:

- It is essential Place outcomes are given even greater prominence to direct the right development in the right locations to support how we mitigate and adapt to climate change.
- It is vital that vacant and derelict land is treated as a structural priority in delivering sustainable development and tackling the embedded problems in health and financial inequality in our towns and cities.
- It is critical that green infrastructure is given far greater prominence and financial investment in playing its role in supporting our communities' wellbeing and providing resilience and tackling climate change.
- The infrastructure First approach promoted by the Infrastructure Commission should be promoted and incorporate proactive arrangements that embed key actions relating to flooding, green infrastructure, energy consumption and connectivity at the outset.
- The River Clyde Corridor is recognised as a vital national development because of the need to co-ordination both how we adapt to the effects of climate change and how we capitalize on our unique assets and the opportunities this presents.
- Glasgow City Centre should be recognised as a spatial priority given its nationally important role in generating national prosperity, the scale of transformation required in its physical environment to improve liveability and economical competitiveness, accommodate sustainable growth and transition towards climate resilience.