

## **Inverclyde Council**

### **National Planning Framework 4 Early Engagement – April 2020**

#### What development will we need to address climate change?

Stronger recognition of land uses that support climate change mitigation and adaptation, and their protection for these purposes. This may involve stronger protection of land passive uses e.g. forestry, open space, flooding.

Potentially a recognition that development that would not have been previously acceptable in designated areas e.g. conservation areas, world heritage sites etc. may be acceptable if the climate change benefits can be justified.

What previously seemed like innovative ideas such as green roofs and walls could begin to be incorporated as standard into designs, where the climate change benefits are proven.

Within urban areas, private gardens contribute significantly to open space and therefore have substantial potential to both contribute both positively and negatively to climate change. Education and encouragement of the benefits of private gardens for climate change mitigation and adaptation should feature in the planning system.

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

Repopulation is a priority for Inverclyde Council and its community planning partners. The area has seen steep depopulation in recent decades and this is projected to continue. Over the longer term, Inverclyde's population has declined from 137,000 in 1951 to 81,500 in 2011. The most recent mid-year estimates (2018) shows Inverclyde to be the local authority in Scotland to have the largest year-on-year population decline, down to 78,150, contributed to by both natural change and migration. Between 1998 and 2018, Inverclyde's population declined by 9%, the largest decrease in Scotland. Inverclyde's population is projected to decrease by a further 6.1% in the 2018-2028 period, the second largest projected decrease for all local authorities, and by far the largest decrease for an urban authority. The Council requests that NPF4 specifically recognises this issue, and as part of early engagement discussions are held with the Council as to how this issue might be addressed.

Planning should influence not just the number of houses, and associated land, but the types of houses to be provided so that specialist and local needs are being addressed. Local household composition, including for community and Council aspirations, should have an influence over the types of houses being provided, rather than this being purely market led and influenced i.e. aspiration for what a new house is 'like' and can provide is heavily influenced by what the market is already providing. Closer involvement of the housebuilding industry in HNDA preparation may help achieve this.

The importance of place for the health and wellbeing of our communities has risen rapidly up the agenda in recent years. NPF4 is setting a vision for 2050 provides an opportunity for this to be

### What does planning need to do to enable development and investment in our economy so that it benefits everyone?

NPF4 and local development plans need to be underpinned by economic forecasts and a vision for the economy, which guide both the identification of new land for employment uses and the release of underperforming employment land from that use, if it can be better utilised for community or climate change uses. Future investment vehicles, such as City Deals, should support these economic forecasts and visions, and be spatially directed to ensure growth and employment is fairly distributed, and opportunities created are accessible from areas of concentrated deprivation.

### What policies are needed to improve, protect and strengthen the special character of our places?

Generally speaking, the role of planning in protecting designated areas (natural and historic environment) is well understood and implemented. This should be continued through NPF4.

Delivery of productive uses on vacant and derelict land, particularly long-term sites, will require a consistently applied policy framework allied with fiscal measures. One measure worth considering involves no net loss of greenfield land. This would involve the active naturalisation of vacant and derelict land sites with limited development potential to be associated with the development of greenfield sites, to be undertaken by the developer of the greenfield site.

Town and city centres are likely to become less commercially focused creating opportunities for community and residential uses, which will bring footfall supporting remaining commercial uses. Planning policies should enable this flexibility whilst still applying town centre first principle to all suitable town centre uses. It would be appropriate for NPF4 to comment on the future of town centre malls which now face low demand.

### What infrastructure do we need to build to realise our long term aspirations?

The transformation to a lower carbon, more digitally connected future will require investment in infrastructure at a national and local level including: broadband, heat networks, electric car charging, and other technologies still to emerge. NPF4 can support this by making the installation of such infrastructure integral to new development.

Current investments levels in active travel will need to be maintained to ensure behaviour change towards active travel happens. Ongoing investment in public transport infrastructure will be required, including supporting digital technology for real time info and joint ticketing. The road network will also need ongoing investment relative to changing travel patterns.

### National Developments

Inverclyde Council supports the continuation of National Development status for the following, which are directly relevant to Inverclyde or the Glasgow City Region:

- Central Scotland Green Network
- National Long Distance Cycling and Walking Network
- High Speed Rail
- Strategic Airport Enhancements

The Council also requests that consideration be given to the following as national developments:

River Clyde waterfront – The Scottish Government, in January 2020, announced that a plan will be developed to maximise the full economic potential of the River Clyde. This will include: strengthening marine-related industry; bringing vacant and derelict land back into productive use; improving the river for visitors, local people and communities; managing flood risk; and climate change mitigation and adaptation. Inverclyde has an active waterfront with significant potential for future growth and enhancement. This includes: existing marine-related industrial sites including Fergusons, Inchgreen dry dock, and James Watt Dock/Garvel Island; Greenock Ocean Terminal, providing the River Clyde's main container and cruise ship terminal; waterfront active travel routes, existing (including NCN75) and proposed; ferry routes to Argyll; visitor attractions such as Newark Castle and Gourock town centre. Many of Inverclyde's most deprived communities are within close proximity to the River Clyde, and would be beneficiaries of its identification as a National Development, both economically and with regard to health and well-being.

Glasgow City-Region vacant and derelict land – In 2018, there was 3,428 hectares of vacant and derelict land in the Clydeplan (Glasgow City-Region) area, with 5 of the 8 Clydeplan planning authorities being amongst the 10 planning authorities with the largest area of vacant and derelict land in Scotland. Much of this land is located within or close to communities within the most deprived datazones, and is often long-term – in Inverclyde 26% urban vacant and derelict land has been identified as such since before 2000, with 11 % identified pre-1991. Despite a long-term focus on brownfield development within the Clydeplan area, many vacant and derelict land sites have remained. Consideration should be given to identification of the Glasgow City Region's vacant and derelict land as a National Development in NPF4, which should promote innovative thinking on bringing these sites into productive use, supported with fiscal measures.

## **Scottish Planning Policy**

### Air Quality

The Council supports the proposed key objective of tackling poor air quality through the promotion of sustainable placemaking and transport links.

Air quality should have a more significant presence in NPF4 than it does in NPF3, both through its own specific policy statement, and through reference in other topic areas that impact on air quality.

Whilst the impact of mineral extraction on air quality is welcomed, this could be widened to include the impact of other industrial processes and mitigation measures to negate their output.

## Business/Employment

The Council supports the proposed key objective to promote business and industrial development that support sustainable and inclusive economic growth while safeguarding and enhancing the natural and built environment.

It is important that NPF4, through its spatial approach, addresses how economic growth can be shared across all of Scotland. To do so will alleviate the problem of unsustainable development in areas where the economy is overheating, whilst bringing growth to those communities who have been adversely affected by changes to the economy over the last few decades and longer.

To enable LDP's to allocate land which meet the needs of various economic sectors, NPF4 should set out a process through which business and industrial land audits can be informed by:

- up to date market intelligence, e.g. take up, availability and quality of existing business premises
- robust demand forecasting, in terms of quantity, location, size and quality of sites
- active engagement and consultation with the business community through bodies such as Scottish Enterprise and the Federation of Small Businesses etc.

## Climate Change

The Council supports the proposed key objective to ensure planning policy results in spatial and land use change that facilitates Scotland's ambition to have to have net-zero emissions by 2045 and other statutory emissions reduction targets whilst supporting communities and businesses in making the changes need to meet the targets.

If the commitment in the Programme for Government for NPF4 to "help radically accelerate reduction of emissions" is to be achieved, planning needs to be able to accurately measure the life cycle carbon footprint of all new development proposals, during both the construction and operational phases, and assess these against set emissions standards/targets. NPF4 should therefore set out appropriate emissions standards for new development, how emissions will be measured (e.g. a carbon calculator tool such as SPACE) and, where necessary, what measures/schemes are available to developers to off-set emissions. In addition, clarity is needed on what type of emissions planning should consider, given that emissions from buildings are addressed through the Building Standards Regulations. To enable this assessment to be carried out efficiently, there should be a clear requirement for development proposals to be supported by the information needed to measure emissions.

Given the complexity of calculating and verifying emissions, and the fact that most planning authorities are not resourced to this, in terms of time and skills, consideration should be given to a self-certification being set up to enable developers to demonstrate that their development proposal has achieved a desired emissions standard.

In light of the significant role that land uses such as tree planting and natural flood management will play in climate change mitigation and adaptation, consideration should be given to LDPs identifying and safeguarding areas for this type of land use.

Given the cross cutting nature of climate change and the various plans and strategies developed address it (e.g. Climate Ready Scotland, Land Use Strategy), there is a general need for NPF4 to promote the integration of relevant plans, specifically their land use elements, into planning.

### Coastal Planning

The Council supports the proposed key objective to recognise and support the unique challenges facing Scottish coastal areas and communities and promote development that supports their need.

In looking at ways to support the needs of the coastal communities, the types of developments proposed should also be considered in light of the threat to the coastline from climate change and the most appropriate types of development to mitigate /withstand adverse outcomes.

### Community Facilities

The Council supports the proposed key objective of promoting and supporting the provision of accessible community facilities where a need has been identified in local development plans.

NPF4 should require developers and planning authorities to consider the impact of new development on existing community facilities, and any requirement for new facilities that the development may generate. In doing so, NPF4 should give examples of the types of community facilities this requirement will apply to. NPF4 should recognise that individual local authorities have different standards for the provision of community facilities, and that these standards are a local matter. If the Government intends to introduce standards for the provision of different community facilities, the initial consideration is whether NPF4 is the best place to consult on and provide these i.e. the role of planning is to provide land for community facilities, quantitative standards for the amount of community facilities required are perhaps best considered by other professionals with specific knowledge of the service to be provided. That said, guidance on the requirements for new education and health facilities as a result of new development would be helpful and would help standardise the approach across the country.

### Culture and the Arts

The Council supports the proposed key objective of supporting the contribution of cultural activities to well-being and prosperity and protecting existing cultural and live music venues.

NPF4 can support cultural venues by applying the town centre first principle to appropriate culture and arts venues and other uses, so as to locate them in areas of strong footfall and where sustainable access is available. Protection should be offered to culture and arts venues in NPF4, with criteria provided to ensure any

change of use is assessed with regards to impact on culture and arts and not just commercial grounds. The 'agent of change' principle should be embedded in NPF4.

### Digital

The Council supports the proposed key objective of supporting the roll-out of digital infrastructure across Scotland so that the social, economic and environmental benefits of digital technologies are delivered in a way that keep environmental impacts to a minimum.

NPF4 should set out a positive policy framework for the delivery of digital infrastructure, whilst ensuring environmental considerations are taken into account. NPF4 can set out the matters for consideration, with individual planning authorities applying appropriate weight to these dependent on local circumstances.

Whilst the market and personal choice should ensure that new developments have digital connectivity, NPF4 should require this of all new homes and business premises. This, however, would raise the issue of how this can be adequately assessed at the application stage. Consideration should be given to making this a matter for which applicants self-certify, confirming that good digital connectivity will be available within the development.

### Energy – Electricity

The Council supports the proposed key objective of maximising the contribution of renewable electricity to meet the net zero target.

The existing electricity policy NPF4 is fairly comprehensive, albeit significantly focused on wind energy

With increased demand from, amongst other things, the target of no new diesel and petrol car sales by 2032, NPF4 must emphasise the need to progress other renewable electricity technologies in addition to wind turbines. Whilst repowering existing wind turbines will provide some capacity, the Wind Energy Spatial Frameworks indicate there are limited opportunities for expansion in many areas unless it is intended to revise the Group 2 Areas of Significant Protection.

As well as making maximum use of resources such as tidal power, NPF4 should look at the development of power systems that use untapped resources such as geothermals and means of using obtaining energy from waste such as anaerobic digestion which has the additional benefit of reducing the need for waste disposal.

However the power is generated, storage also needs to be addressed to achieve maximum use of output. The implications of locational requirements close to point of use also need to be addressed.

### Energy – Heat

The Council supports the proposed objective of maximising the contribution of renewable heat generation systems to deliver renewable heat and reducing the cost of delivering this transition.

The profile of renewable heat and its encouragement in new developments needs to be significantly raised in NPF4. What is currently the exception needs to become the norm for both developers and local authority planners. NPF4 should include a requirement for developments of an appropriate scale to be accompanied by an energy statement setting how renewable heat/heat networks will be used within the development, and make clear that a strong justification is required for not making use of renewable heat/heat networks is required. This will give planning authorities confidence to pursue this requirement.

Individual projects where the means of producing and distributing heat are within the control of one body such as a housing association or a university are more straightforward to establish. NPF4 needs to set a framework for this to be achieved where multiple landowners, properties and utility companies are involved to create networks between adjoining uses and developments.

### Flooding

The Council supports the proposed objective to reduce the vulnerability of existing and future development to flooding.

NPF4 should highlight the need for RSSs and LDPs to reflect and support the land use elements of Regional Flood Risk Management Plans and Strategies.

The effectiveness of SuDS in reducing surface water flooding relies on the schemes being maintained to a standard. As the maintenance of SuDS continues to be problematic, NPF4 should provide clear guidance on how planning permissions can ensure their future maintenance, particularly in relation to which body has responsibility for maintenance.

To ensure consistency and fairness across local authority areas, consideration should be given to identifying a climate change freeboard allowance for each Local Plan District, as identified in the Flood Management (Scotland) Act 2009.

Further guidance is required on the provision of permeable surfaces in new development, particularly on the extent of the provision that can be required.

The safeguarding of land for future flood management would be a valid consideration in NPF4.

### Green Belts

The Council supports the proposed key objective of directing planned growth to the most appropriate sustainable locations and whilst protecting and enhancing the character, landscape setting and identity of settlements and providing access to the countryside.

The current NPF4 usefully sets the purpose of green belts and the types of development that are acceptable within them. However, it does not make it clear when it is appropriate for a planning authority to designate a green belt, and it would be useful to have this clarity. With green belts being perhaps the best known, and often the most contentious planning tool, NPF4 needs to be clear and prescriptive with regard to where and how they are to be used. The current, and long term,

purpose of green belts has been to support spatial strategy, and this should remain the case. The identification of land for climate change mitigation purposes can be something that happens within green belts rather than being a purpose of green belts. Whilst it may be appropriate for NPF4/RSS to identify green belts, it should also be made clear that planning authorities can decide to do so through LDPs if considered appropriate locally.

If the NPF4 suggestion for hutting in the rural development section is promoted, there would be a need for identification of the types of areas that would be suitable within the green belt that would not interfere with the enjoyment of the countryside nor affect the natural environment.

### Green Infrastructure

The Council supports the proposed objective to protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking.

The Council strongly believes that green infrastructure has a key role to play in supporting health and well-being, e.g. through the provision of open spaces and active travel networks, and the knock on positive effects on air quality. Green Infrastructure can also play a key role in climate change adaptation, through the provision of natural flood management measures, green networks that support habitat and species connectivity, and landscaping that provides shelter and cooling.

To ensure green infrastructure provision is given due weight and consistently and fairly applied across local authority areas, NPF4 promote a national minimum standard/requirement and a process for development proposals achieving it. Consideration should be given to the use of an accreditation scheme such as Building with Nature.

To ensure that a coordinated approach is taken to the provision of green infrastructure and that benefits are maximised, consideration should be given to a requirement for the preparation of green infrastructure plans at either settlement, local authority or regional level.

As the natural characteristics and green infrastructure potential of sites will significantly inform the preparation of development proposals, NPF4 should highlight the need for green infrastructure provision to be integral to a design led approach.

### Gypsy Travellers

The Council supports the proposed key objective of ensuring that current and future accommodation needs of Gypsy/Travellers are met so that they are provided with access to good quality, safe and appropriately located sites.

NPF4 should include guidance on the requirement for Gypsy/Traveller sites, based on available evidence that planning authorities can make use of. Any policy requirement to provide sites should be based on evidence and an actual requirement, and NPF4 should, for example, avoid requiring every planning authority to provide land for a site if there is no evidence for need in that area. To

accommodate any emerging need, NPF4 should include criteria to support proposals that come forward.

### Health

The Council supports the proposed key objective of ensuring that planning policies and decisions take account of the health needs of local communities and have regard to the need to improve diet, health and wellbeing of people living in Scotland.

It is recognised that land use planning has a significant role to play in improving the physical and mental health of the people of Scotland, through the creation of successful places, provision and protection of open space and sports facilities, direction of development to sustainable locations, promotion of active travel. It would be appropriate for NPF4 to promote health and wellbeing as a priority for planning in the same way as economic growth and sustainability.

### Historic Environment

The Council supports the proposed key objective of supporting the understanding, protection and importance of the historic environment allowing its cultural, social, environmental and economic value to contribute to Scotland's well-being.

NPF4 should continue the SPP approach of protecting Scotland's historic environment. Relevant aspects of the Historic Environment Policy for Scotland can be included in NPF4 to provide them with a statutory basis as part of the development plan.

NPF4 should include reference to the continued relevance of Article 4 Directions in conservation areas.

### Housing – Affordable

The Council supports the continuation of policy support for affordable housing provision in NPF4.

It is not clear that it is appropriate for national policy to set a cap on affordable housing provision (currently 25%) when local evidence may indicate that the requirement is greater than this. In some instances the cap can lead to a situation when more land than is necessary for market housing is released in order that an affordable housing requirement can be met. The policy should therefore enable local circumstances to be taken into account. Such an approach would also set the context for continued support of rural exception policies.

### Housing – General

The Council supports the proposed key objective of ensuring that development plans allocate the right land in the right place at the right time and facilitate and monitor the delivery of this land. However, the key objective should also recognise the importance of housing development to placemaking and for the health and wellbeing of communities.

There are aspects of SPP that work relatively well and have become an understood part of the process by the development industry and to a certain extent communities: plans to be informed by an HNDA; alignment of HNDA, LHS and development plans; identification of housing supply targets and housing land requirement. It is considered that development plans will have to continue to quantify the amount of new housing required in order to provide certainty. If NPF4 is to set out housing supply targets, it must recognise housing market areas, and should not be purely trend based but reflect other policy approaches such as repopulation. The maintenance of a 5-year effective land supply, whilst good in principle, has become mired in disputes about methodology. This could be rectified by the publication of clear guidance. It is not clear how a system based on the maintenance of a 5-year effective land supply and a 10 year development plan cycle will operate together, and NPF4 should offer direction on this.

### Housing – Specialist

The Council supports the proposed key objective of improving planning policy so that the housing needs of older and disabled people are better accounted for in the planning system.

Current planning policy on accessible and adapted housing, wheelchair housing and supported accommodation is not proportionate to the likely future scale of this requirement as Scotland's population becomes more elderly. Planning authorities need more certainty to provide them with the confidence to allocate sites specifically for specialist housing and to require new accessible/adapted/wheelchair housing, particularly in new build private sector housing, where the current approach has been to not intervene in house types provided by builders for the private market.

### Infrastructure

The Council supports the proposed key objective to promote the alignment of development and infrastructure at the local, regional, and national level by identifying infrastructure capacity, need and what is required to support its delivery.

Given the multiple benefits provided by Green Infrastructure and the key role it plays in climate change adaptation, health and well-being, and placemaking, NPF4 should ensure that green infrastructure is considered on a par to transport, energy, water/drainage and digital infrastructure.

Consideration should be given to an infrastructure self-certification scheme (e.g. for gas, electricity, digital, water, transport) being established, whereby developers, in conjunction with service providers, establish the infrastructure requirements for their proposals and the costs of provision. This scheme would help ensure that the infrastructure requirements and deliverability of development sites proposed for inclusion in Local Development Plans, and windfall applications at the development management stage, are fully considered at an early stage. This scheme, allied with an NPF4 requirement for its implementation, would front load infrastructure provision, thereby providing scope for infrastructure costs to be incorporated into the decision making process of (1) developers on land valuation and project viability and

(2) planning authorities on the deliverability of sites proposed for inclusion in LDP's and windfall sites.

If a self-certification scheme was considered appropriate, it would need to be supported by an infrastructure portal, which provides developers with map based information on existing provision across Scotland and a single point of contact (i.e. gateway) for information requests.

To address the climate change emergency, NPF4 should prioritise all existing and new infrastructure investment decisions based on their contribution to the delivery of net-zero targets, as recommended by the Land Commission.

### Land Assembly

The Council supports the proposed key objective to promote a proactive, infrastructure first approach to land assembly, including the use of compulsory purchase powers where appropriate, and to underline that doing so can support the delivery of planning/placemaking objectives.

The Council agrees that NPF4 should strengthen messages around land assembly to promote more proactive development delivery by planning authorities.

It would be helpful if NPF4 clarified the potential circumstances in which a proactive approach to land assembly might be appropriate and provided guidance on how such an approach can be justified.

### Natural Environment

The Council supports the proposed key objective to protect, enhance and promote access to the natural environment and to support its sustainable use and secure positive effects when considering new development.

The process for designation of sites at all levels is working with the guidance from SNH and other specialist bodies. Additional guidance at the NPF4 level isn't necessary.

With the Planning (Scotland) Act 2019 stating that the provision of 'positive effects for biodiversity' is one of the six key outcomes for NPF4, there is a clear need for NPF4 to address the continued uncertainty within planning about how biodiversity is to be incorporated into development plans and delivered at the development management stage. For example, what measures fall within the term biodiversity? What is the process for determining whether a proposal will result in net biodiversity gain? Is biodiversity gain to be determined at a site, settlement, local authority, regional or national level? If development proposals can off-set negative impacts through contributions to a regional or national ecological network, how would this work in practice?

To enable biodiversity gain to be applied in a consistent and fair way across local authorities areas, NPF4 should adopt the concept of biodiversity net gain (BNG) and include a clear and enforceable policy on BNG (similar to that due to be adopted in England and Wales). This should include a requirement for planning applications to be supported by biodiversity gain plans.

Woodland creation could be supported through a requirement for LDPs to identify and safeguard opportunity areas. This would ensure that opportunities are not lost to other forms of development.

### Peatland

The Council supports the proposed key objective of having regard to the desirability of preserving peatland to achieve climate change benefits of reducing emissions, and other benefits of air and water quality, biodiversity and habitat creation and flood alleviation are realised.

NPF4 policy criteria for considering proposed development on peatland should include; a specific locational need for the development; if it is a small scale development connected to a rural business; if it is for a renewable energy or minerals development which will be fully restored afterwards and it can be demonstrated that the adverse impacts on the peatland resource during the construction and operational phases of a development will be minimised; and that the development will not result in a net increase in CO2 emissions over its lifetime.

Elsewhere in this response, there is suggestion on a no net loss of greenfield land approach, with brownfield sites naturalised to account for loss of greenfield land. This approach could also take account of mitigating carbon emissions released/not sequestered as a result of greenfield development.

### Placemaking

The Council supports the proposed key objective to deliver sustainable, well-designed places and homes that meet the needs of people living in Scotland including, in particular, the housing needs for older people and disabled people. This will be done through a design-led approach which demonstrates the six qualities of successful places.

NPF4 should encourage that the Place Standard Tool is incorporated into the early stages of preparing LDP's, masterplans and major pre-application consultation. The use of the tool for monitoring the effectiveness of plans and new developments should be highlighted. There is also a need to emphasise that the tool should be used by developers as well as planning authorities and communities.

NPF4 should emphasise the need for developers to demonstrate how the principles set out in Creating Places and Designing Streets have been incorporated into development proposals.

### Rural Development

The Council supports the proposed key objective to promote rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

NPF4 needs to put greater emphasis on the sustainable element of this objective and indicate how important the goal of populating rural areas is in relation to the impact on the environment from needs such as transport links and loss of undeveloped to achieve it.

With climate change producing longer growing seasons and Brexit causing uncertainty about movement of supplies, more home grown produce and a requirement for workers to expand the rural population may result. This will require policies on rural housing and the provision of quality digital connectivity to rural areas. Policies on the re-opening of closed railway lines to serve rural communities would also need to be included.

In the interest of health and well-being and with the likelihood of more stay at home holidays when flying is curtailed due to climate change, NPF4 needs to provide policies on hutting and other holiday accommodation within the rural area.

### Sustainability

The Council supports the proposed key objective to ensure that the planning system supports the Scottish Government's purpose of focussing on creating a more successful country with opportunities for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth which is achieved with a view to achieving net zero carbon emissions by 2045.

The overarching principle of the planning system should be sustainable development, and this should run as a thread through the entirety of NPF4. By some measures e.g. carbon emissions, no development is sustainable as during construction and operation it will cause carbon emissions. By other measures, many developments can claim to be sustainable by incorporating measures such as low and zero carbon generating technologies. To a certain extent with regard to carbon emissions, the strongest influence planning can have is directing development to locations that are sustainable or can be made sustainable, with regard to how people travel to these places or how they are powered and heated. Sustainability does relate to more than carbon emissions, however, including the creation of successful places that will endure and enhance the economic and social well-being of communities. NPF4 needs to be clear, therefore, on what sustainable development is, if it is to be biased towards climate issues, and how it is to be measured.

Given the number and breath of principles included in the current SPP Sustainability principle policy, and the fact that some development proposals will not meet all of these, if these are to remain, NPF4 should clarify what weighting should be applied to each principle at the development management stage.

### Tourism

The Council supports the proposed key objective to support inclusive economic growth of the tourism industry in a way that benefits and strengthens the resilience of local communities, including those in rural and coastal areas.

The importance, and possible growing importance, of tourism to the Scottish economy should be recognised by NPF4. The infrastructure required to support both domestic and international tourism should be identified and protected by NPF4. Of particular significant to Inverclyde and the wider Glasgow City-Region is Greenock Ocean Terminal cruise ship facility, the expansion of which is currently under development.

NPF4 should offer policy on managing the impact of short term let properties on communities and the housing market.

### Town Centres

The Council supports the proposed key objective of planning policies recognising and addressing the challenges facing town centres so that they are better able to adapt and be vibrant, creative, enterprising and accessible places to live, work and visit.

There will be a continuing need for the re-purposing of existing floorspace within town centres, and therefore flexibility for change of use within town centres will be essential. Consideration will also need to be given to the adaptability of existing and proposed floorspace to accommodate new uses. Town centres should continue to be supported by the town centre first approach, with this being more stringently applied to all uses that can support town centres and not just retail. The consideration of cross-boundary impact should be promoted by planning policy. The range of services available in town centres and their accessibility by all forms of transport mean they continue to have a crucial role in supporting sustainability and equality.

### Transport

The Council supports the proposed key objective to ensure that new development supports delivery of the vision and priorities set out in the National Transport Strategy.

Currently, the majority of new development is designed in a way that prioritises car travel over sustainable travel modes. For example, road layout and parking provision are seen as key design elements, with active travel and public transport provision secondary to this. Given current levels of car use and public expectation that this will continue to be accommodated in new development, it is understandable that developers are reluctant to shift away from prioritising the car. In order for planning to overcome this reluctance, align with the travel hierarchy and deliver associated carbon reduction, health and place making benefits, NPF4 needs to provide a much stronger policy basis, allied with a design process and set standards (i.e. car parking) that clearly prioritise sustainable travel modes.

To fully and consistently implement the current SPP requirement for planning permission not be granted for significant travel-generating uses in certain circumstances, clarity is needed on the thresholds for determining significant travel-generating uses.

In light of the Scottish Government's commitment to phase out sales of petrol and diesel cars and vans by 2032, NPF4 should require the provision of electric charge points for relevant new development types. This should be accompanied by a national standard of provision.

### Vacant & Derelict Land

The Council supports the proposed key objective to prioritise the use of vacant and derelict land so that viable development takes place on appropriate sites ahead of

greenfield land as part of priorities to deliver inclusive growth and sustainable places and responding to the climate emergency.

Given the very limited reference to vacant and derelict land in SPP, there is a clear need for NPF4 to address these land types directly, potentially through a dedicated policy.

In light of the different characteristics of vacant and derelict land (e.g. the former is ready for redevelopment, while the latter requires some form of intervention, with a significant proportion of derelict land comprised of a hard core of ex industrial sites which have been on SVDLS register for a significant period of time), consideration should be given to NPF4 adopting a more nuanced and tailored approach to each land type.

In relation to vacant sites, a greater emphasis should be placed on providing developers with up to date information on these sites, in terms of site history, infrastructure provision/requirements, physical constraints, ownership details and planning designation/status etc. While this information is already available from a combination of the Scottish Vacant and Derelict Land register and other sources, it could be collated and presented in a user friendly format and pro-actively marketed to prospective developers/community groups etc.

With regard to derelict land, site remediation costs are often prohibitive and a significant barrier to redevelopment. To address this, consideration should be given to a policy of 'no net loss of greenfield land', whereby any release/development of a greenfield site is required to ensure that a vacant or derelict site is remediated and made available for a green infrastructure and/or community use.

Consideration should also be given to fiscal incentives that encourage landowners to either re-use or dispose of vacant sites.

In principle, the Council supports the idea of developers being required, in certain circumstances, to demonstrate why their proposal is not viable on brownfield land.

### Waste

The Council supports the proposed key objective to support the management of waste in line with the waste hierarchy (waste prevention; reuse; recycling; energy recovery and waste disposal) and to guide development for new infrastructure to appropriate locations.