

National Planning Framework 4 – Call for Ideas

Elevating the National Planning Framework 4 to be part of the Development Plan provides an opportunity to enhance the status of new Local Development Plans, with a focus on delivering the right outcomes in the right places in our local areas by involving our local communities and a range of stakeholders.

It should also provide consistency as well as certainty with a planning policy approach applied consistently across the country.

It is considered that National Planning Framework 4 (NPF4) should focus on high level outcomes for Scotland such as assisting in addressing climate change and delivering sustainable and inclusive economic growth, enabling local people and our communities to shape the Local Development Plan's along with Local Place Plans to develop a framework to respond to local priorities and circumstances.

NPF4 should set a framework that will empower people to play an active role in shaping the future of their place, It should assist in ensuring that people in our communities have a real influence over their area through working in partnership, inclusiveness and meaningful early involvement in local matters capturing community's aspirations.

Renfrewshire Council support the NPF 4 response prepared by Clydeplan which covers a range of policy areas in detail. This response focuses on the key outcomes for NPF 4, national developments and the Housing Technical Discussion Paper.

Climate Change

Assisting in addressing as well as adaptation to Climate Change requires to be an overarching principle of NPF 4. A policy framework approach across all topic areas and themes is required.

A key element of the framework is a balanced approach which allows climate change objectives and adaptation measures to be met and delivered while enabling continued sustainable and inclusive economic growth and investment, creating high quality places as well as preserving the many assets across the country.

The transition to a net zero carbon economy is both a challenge and an opportunity for Planning to assist. This will require a focus and a clear direction within NPF 4 on how we move around our towns, cities and rural areas, where development is located and the potential to support sustainable economic growth, as well as the development of new technologies in the renewable energy sector.

Renfrewshire Council welcome the proposed alignment between NPF 4 and Strategic Transport Projects Review 2(STPR2) and the opportunity that this will provide to prioritise investment in key infrastructure, sustainable transport interventions, green and blue interventions and active travel.

A key challenge in adapting to the effects of climate change is the need to avoid, adapt and mitigate flood risk as well as supporting the re-development of vacant sites within towns and cities across Scotland. This will require a careful balance

between managing climate change risks and supporting sustainable economic growth.

Clear direction is required to be set out within NPF 4 to maximise the potential of river corridors. There is a need to identify how much development land is predicted to be within floodplains as a result of the effects of climate change and set-out how the spatial strategy of Development Plans as well as working collaboratively with both public and private bodies/parties/agencies should respond to this issue.

A key challenge in mitigating and adapting to the effects of climate change is the delivery of well insulated and energy efficient homes. It is important that NPF4 provides clarity on the role of the Planning System and the housebuilding industry in delivering warm homes and assisting in reducing carbon emissions from new development, in support of the forthcoming strengthening of Building Standards.

Further clarity/direction is also required on the viability of heat networks in new development and how development can be 'future proofed' to support the recovery of heat later when it is not currently viable.

People

The Council supports the focus within the new Planning Act on health and wellbeing and the need for Local Development Plans to help meet the housing need of key groups including older people and gypsy travellers. There also requires to be clear commitment to the Getting it Right for Every Child approach which should be adopted by all local authorities when preparing their Local Development Plan. It is anticipated that clear guidance will be set out within NPF 4 to help ensure good planning and placemaking can have the required influence on public health and the housing needs of these groups.

Renfrewshire Council would welcome and recognises the need to have greater alignment between the Planning System and public health bodies. Clarity on how health and the impact of development should be taken into account when preparing Local Development Plans and when assessing planning applications is welcomed to ensure that this better alignment can be put into practice.

Further consideration is also required to whether the current Housing Needs and Demand Assessment approach is sufficient to identify the housing needs of key groups. For example, the current HNDA process has not proved to be robust in identifying the needs of Gypsy/Travellers across Scotland. A national coordinated approach within NPF 4 to build an evidence base to understand travel patterns and the need for site provision across the country would be the most appropriate approach to meeting the needs of these communities.

Demographic change over the next 25 years with people living longer, will have a significant effect on our communities. NPF 4 presents an opportunity to assist in shaping an evolving housing system in line with the ambitious vision and principles of 'Housing to 2040'.

Adopting a 'targets' approach, as is proposed for the delivery of accessible homes, can be beneficial, however, there is a need for a co-ordinated approach with the development industry to deliver a greater range and type of new housing including

flexible housing products that can be used as a 'house for life'. While there is a need for a clear and effective policy in NPF 4, the delivery of improved technical standards is best achieved through the Building Standards process.

Work

The Council supports the objective of NPF 4 to contribute to sustainable economic growth that assist in reducing poverty and inequality across Scotland. In delivering this objective it is important that NPF4 provides a clear delivery framework to maximise opportunities in the key economic growth sectors while recognising that the delivery of sustainable and inclusive economic growth requires the creation of a diverse economy rather than one overly focused on 'key sectors'.

The delivery of inclusive growth will also require geographical disparities in the distribution of economic growth to be highlighted. NPF 4 requires to be flexible in its approach to recognising that there are opportunities and challenges in delivering sustainable and inclusive economic growth which will vary across the country and future strategic investments require to be targeted recognising the distinct strengths of different regions.

A national approach to the delivery of infrastructure is key to ensuring infrastructure requirements are identified and prioritised to support the aspirations of economic growth, including investment in a well-connected public transport network and digital infrastructure to connect people with employment and investment opportunities and markets.

While there is a need to focus infrastructure investment to support a transition from car-based travel to more sustainable modes of travel in line with climate change objectives, it is important that investment is also prioritised to address current road infrastructure capacity constraints and support sustainable economic growth across Scotland.

Place

Placemaking should remain central to NPF 4 which should continue to identify the qualities of successful places in Scotland, including key assets that contribute to each Regional Spatial Strategy area and any cross-boundary issues.

The protection and creation of high-quality places is best delivered through Local Development Plan's and potential Local Place Plans which can reflect local circumstances and opportunities. It is therefore important that the policy framework in NPF 4 is sufficiently flexible to allow local circumstances to be taken into account.

A clear statement on how Local Plan Plans fit into the plan-making process would also support a coordinated approach to placemaking and ensure consistency between plans.

Renfrewshire Council support proposals to try and streamline discussions on Housing Land Supply through the identification of a housing land figure for each local authority area. If successful, this would assist Local Development Plan's to focus on delivery. However, while it is important that Local Development Plan's provide a flexi-

ble land supply to meet housing targets, it is important that NPF recognises the significant opportunity that is provided through the re-use of vacant buildings, many of which are in sustainable locations beside existing communities, services and infrastructure.

Also, as current issues related to COVID19 will impact on the future delivery housing land, it is important that NPF as well as Homes for Scotland recognises that the non-delivery of housing land, that has been identified within Local Development Plan's will not always mean that there is a shortfall in the land supply and therefore there is the need to release even more land over and above the generous land supply already set out. The focus needs to be on placemaking and the creation of high-quality places to benefit local communities whilst recognising the need to support the economy and the housebuilding industry.

As set-out in the Council's response to the Housing Technical Paper further clarification is required in relation to the proposed approach and whether the proposals would streamline planning for housing.

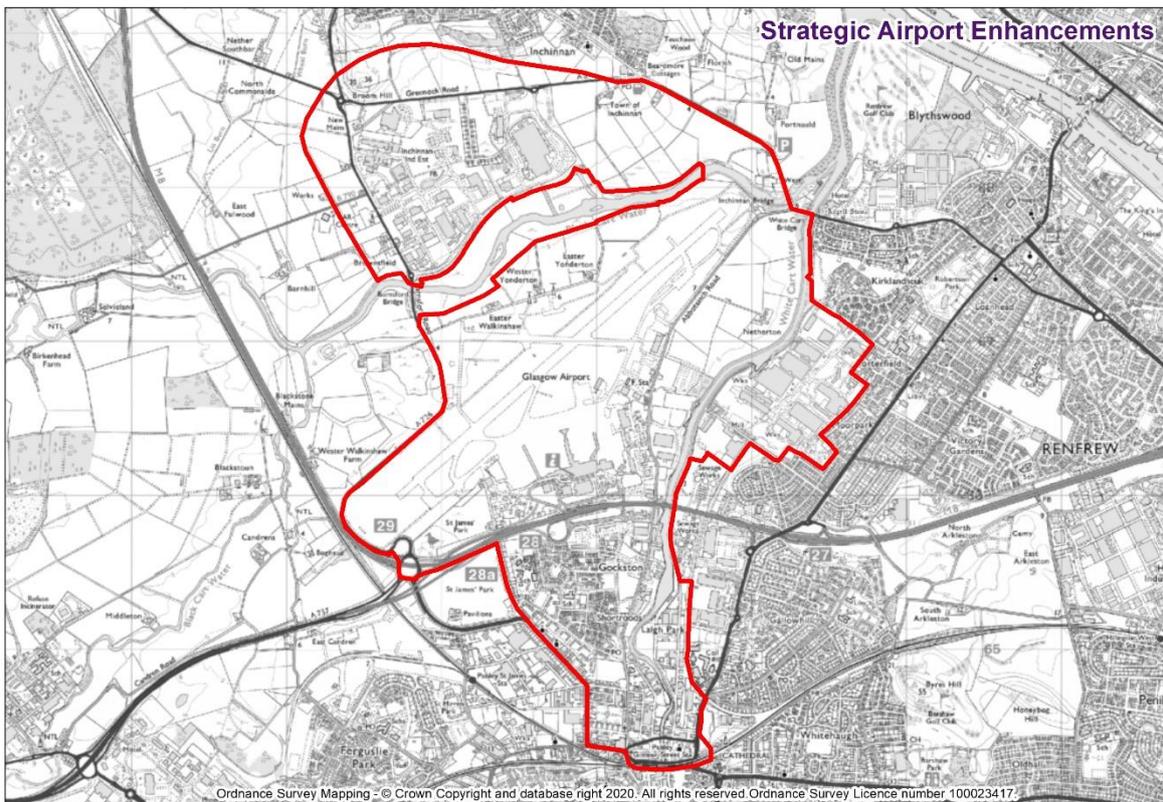
It is noted that one of the statutory outcomes for NPF 4 set out in the 2019 Act is the need to secure positive effects for biodiversity. It is recognised that this is a key driver towards achieving the Scottish Government's ambitious carbon reduction targets and supporting the need for nature-based solutions to climate change. Should NPF 4 take a similar approach in terms of the concept of biodiversity net gain from new development, which will shortly be implemented in England and Wales, a clear statement to explain how this is to be implemented and how local authorities will measure 'positive effects' when assessing a planning application will be required. NPF4 should also set out the role of Key Agencies and other stakeholders in securing positive effects for biodiversity.

National Developments

Renfrewshire Council support the response from Clydeplan in relation to National Developments and the continued inclusion of the following developments in NPF 4 which relate to Renfrewshire and the wider Glasgow City Region:

- **Strategic Airport Enhancements** – supporting the main airports as gateways and recognising the importance of lifeline links. Wider investment zones supported at Glasgow and elsewhere (a revised boundary of the area around Glasgow Airport is attached below). The Glasgow Airport national development should include:
 - Extension of the site boundary for airport operational uses
 - New and/or expanded airfield, terminal and landside infrastructure and buildings
 - Advanced Manufacturing and Innovation District Scotland and airport related business/industrial/logistics development
 - Strategic sustainable surface access interventions
 - On-site renewable energy generation infrastructure
- **Central Scotland Green Network** – creating a step change in environmental quality, addressing areas of disadvantage and attracting investment.

- **Metropolitan Glasgow Strategic Drainage Partnership** – water and drainage infrastructure investment to build climate change resilience and unlock potential development sites.
- **National Long-Distance Cycling and Walking Network** – closing gaps in the current networks to enhance visitor experiences and provide a better access to the outdoors for people.
- **High Speed Rail** – improving connections to the UK and Europe, strengthening links between cities.



The Council also support the inclusion of Clyde Mission (promoted in the Clydeplan response) as a new National Development in NPF 4 which will be delivered through a variety of transformational projects along the River Clyde Corridor.

Response to Housing Technical Paper

Renfrewshire Council support the proposals set-out in the paper to streamline planning for housing and free up planning authorities and stakeholders to focus on delivery and the creation of quality places. The proposal to set a 'housing land figure' for each authority could assist in achieving, however further clarification is required in relation to aspects of the proposed approach identified in the discussion paper.

Guiding Principles

Renfrewshire Council support the guiding principles set-out in the discussion paper and agree that targets should be set at local authority level rather than setting national or regional targets.

The following 'guiding principle' should be added to the paper to reflect the collaborative approach that is required to support planning for housing across Scotland: "*Engagement with communities, key agencies, stakeholders and developers will be important nationally and locally. Infrastructure providers and the development industry could positively contribute to this work and in particular bring their expertise to developing delivery programmes to achieve the ambitions of NPF*".

The Council would also agree that local authorities should be invited to agree or propose alternative scenarios and assumptions before the housing land figure is set within NPF 4.

It is important that sufficient time is given to local authorities to feed into this process, as any alternative scenarios and assumptions will require the local authority to develop a robust evidence base.

While the discussion paper identifies that an agreed proportion of the land supply should be 'deliverable' it is considered that further clarification is required to explain what would be considered 'deliverable' land and how this should be monitored. All housing land within a Local Development Plan should be *deliverable* albeit some sites may be constrained and require investment in infrastructure to support the development.

The Council will continue to monitor the housing land supply in consultation with other stakeholders through the annual housing land audit, however, there may be occasions when it is not possible to reach an agreed position on the amount of 'deliverable' land within the supply. In this instance, there may be a role for the Scottish Government to take a view on the level of deliverable land when considering the Council's annual Planning Performance Framework.

Relationship with Local Housing Strategy

The discussion paper suggests that the evidence base used to inform NPF 4 could be used to inform a local HNDA for the Local Housing Strategy (LHS) and Local Development Plan. This is only possible if the LHS follows the adoption of the NPF, however, this will not always be possible. In this scenario there is potential for conflict between the Housing Supply Targets set in the LHS and the housing land figure in NPF 4.

Local Authorities are required to set Housing Supply Targets within their LHS informed by a full HNDA taking into local factors and trends. The proposed approach in the discussion paper would set a housing land figure without a full consideration of housing need and demand. It is important to ensure that there is consistency between Housing Supply Targets and the Housing Land Figure to avoid delays during the gatecheck process.

The HNDA process also requires to be assessed as robust and credible, further clarification is required to explain how this would apply to the stages of the HNDA undertaken in preparing the NPF 4.

Flexibility and time period of Housing Land Figure

The Council agree that flexibility should be added to the housing land figure, however, further information is required to explain how this would be set and what factors would influence the level of flexibility within a local authority area.

Renfrewshire Council would suggest that the level of flexibility should not be set within the NPF 4. The most appropriate stage to set the level of flexibility would be following a full HNDA and consideration of local factors including past completions, market conditions and the growth aspirations of the local authority. The level of flexibility could be considered through the gatecheck process in the preparation of the Local Development Plan.

Further clarification is also required on the expected time period of the housing land figure set in NPF 4, as Local Development Plan's will be adopted at a later date and will be required to provide a 10-year housing land supply. If NPF 4 only includes a 10-year target, it will need to set-out how local authorities should project this target forward to cover the plan period of their Local Development Plan.

Housing Market Areas

The approach set-out in the discussion paper would help provide clarity in terms of the amount of land required for housing within each local authority area. While the Council agree that authorities may wish to work together to reflect housing markets that cross local authority boundaries, it is considered that this could lead to issues with consistency in terms of how this is applied across the country and will create delay during the examination of Local Development Plan's as is the case with the current approach which requires LDP's to meet Housing Supply Targets for the local authority area and each housing market area.

Impact on Adopted Local Development Plan's

While setting a minimum housing land figure for each local authority could help streamline planning for housing in preparing future Local Development Plan's, it is important to clarify what the implications would be for adopted Local Development Plan's, when the housing land supply in the Plan cannot meet the housing land figure set in the NPF.

While the Council will be able to address this in preparing the new Local Development Plan, further guidance would be required to clarify whether a shortfall in the housing land supply in the adopted plan would result in a presumption in favour of sustainable development in line with the approach set-out in Scottish Planning Policy. This could have significant resource implications for local authorities in processing planning applications to address an assumed shortfall while preparing the new Local Development Plan.