



# **Stirling Council**

## **Response to Consultation: National Policy Framework 4 – Call for Ideas**

**Part 1:** Ideas for what Scotland will be like in 2050 and the changes we need to get us there.

## 1. What development will we need to address Climate Change?

### What will we need to do to reach the target of net zero emissions by 2050

We will need to:

- Use energy more efficiently by improving the thermal performance of buildings and specify building insulation measures that have a low-carbon impact and/or that naturally sequester carbon.
- Retain and re-use existing and historic buildings in order to preserve the embodied energy within existing structures through restoration, upgrading and adaptation.
- Utilise vacant and derelict land and make best use of existing infrastructure.
- Create robust, resilient and diverse zero/low carbon energy generation and distribution networks that harness energy from the sun (solar farms/installations), land (ground source heating), water (water source heat and hydro), air (air source heat), wind (onshore and offshore wind turbines/farms), and waste (anaerobic digestion).
- Continue to invest in afforestation/reforestation and peatland restoration projects to sequester carbon.
- Invest in green transportation and associated infrastructure.
- Put carbon impacts at the heart of decision making; improving our carbon literacy is key to this. In the context of planning, with regulatory support from the Scottish Government, all new development could be required to be carbon neutral/carbon negative.

### How places can be made more resilient to the long term impacts of climate change?

Climate change resilient places need to be well-adapted in order to be able to withstand warmer and wetter weather. This could be achieved by:

- Increasing opportunities for local food growing. Within urban areas, greenspaces and vacant/underused sites could be utilised for local food production such as community gardens and allotments.
- Introducing urban greening initiatives to create healthy and attractive places/streets. This could include retrofitting buildings with green roofs/walls

and the planting of streets trees that can improve air quality, sequester carbon, reduce surface water flood risk and create areas of shade to help counteract the impacts of extreme heat on streets, spaces and buildings.

- Other retrofitting schemes including, where appropriate, renewable energy installations and replacement of large areas of hard surfacing with permeable surfacing/sustainable drainage features.
- In built-up urban areas, avoid the formation of urban heat islands by avoiding the development of buildings that through their form and use of materials reflect sunlight onto surrounding streets, spaces and buildings (i.e. curved elevations and reflective glass), as this can increase temperatures at ground level which carries with it increased risk of harm to human health and the environment, as well as property and infrastructure.
- Reinstating natural watercourses and natural floodplain in appropriate locations.

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

### Where we might want to live in 2050

- In healthy, sustainable communities with good schools and employment opportunities and where community infrastructure, local services and amenities; sports and leisure facilities; nature, and high quality and multi-functional open space can be accessed easily, safely and comfortably via a choice of walking/wheeling, cycling and public transport routes.
- In areas where the private car does not dominate the way in which we experience a place and how we move within and through it.
- In well-connected places with sustainable transport options to a range of destinations.
- In areas and buildings which are digitally connected allowing us to fully participate/take advantage of the technological world for social interaction, leisure and work/education.
- In areas and buildings which are not at risk of flooding, extreme weather events and/or air pollution. Environmental security is essential for peace of mind and wellbeing. [University of Hull [research](#) which links long term mental health issues with previous flooding events].
- In areas where quality of life and economic prosperity is high and in buildings that are attractive, affordable (to own, heat and maintain), and adaptable.

## **How many and what types of homes we will need**

Population statistics show a growing population with migration the main driver of growth. The figures also show an increase in the 65+ population. This suggests a need to deliver a greater number and range of homes and tenures. This provision should reflect population projections and correlate with wider health strategies (i.e. care within communities etc.). Intergenerational housing, and developments layouts/facilities that consider and accommodate such needs will be required.

We will also need homes which have, through their location, construction techniques, materials and heating/cooling and lighting technology, a low environmental impact; and, homes that utilise technology and power and heat sources to safeguard occupants from fuel poverty.

## **How we can encourage more people to live in rural Scotland**

There is a need for clarity as to what constitutes 'rural Scotland', and what it is that we are trying to tackle by encouraging more people to live there? Is it applicable to areas of rural countryside, or is it also applicable to smaller communities or rural settlements? If the latter, then specific provision should be made for starter homes and homes for those that wish to downsize.

Any strategy to encourage growth and/or repopulation in rural Scotland should be about more than just permitting new homes. A strategic approach is needed to strengthen and sustain rural communities. Where provision is made for new homes it must be supported by opportunities for employment, flexible shared working space etc. including any digital infrastructure improvements needed to support this.

From a Stirling perspective, this needs careful consideration. The vast majority of 'rural' countryside in Stirling, i.e. outwith settlements, is easily accessible from both Stirling and Glasgow, and is therefore an attractive location for commuters to both. This leads to high development pressure for new housing in the countryside. Such development needs careful consideration to ensure that it does not come at a cost to the environment, for instance, by encouraging unsustainable travel patterns and resulting in the incremental loss of green landscape and agricultural land.

## **Whether we could target development to address longstanding differences in health and quality of life**

There is a growing realisation that the quality of our places impacts on peoples' health and wellbeing (quality of buildings, neighbourhood design, public transport, active travel, green space, play, local amenities, services, employment etc.). The location and design of new development, including open spaces and the connections between them, particularly via active travel, all have a part to play in tackling inequalities in health and quality of life.

The new Planning Act requires consideration to be given before planning permission is granted (national and major developments), to the likely health effects of the proposed development. There is a need to align new national planning policies within NPF4 with the proposed public health principles.

A key question is how to tackle poor health and quality of life in areas which may remain untouched by new development.

### **Whether and where we might need new settlements, and regeneration of existing communities**

#### **New Settlements:**

We consider that new settlements have a role to play in achieving strategic growth but they must be in highly accessible and well-connected locations or those that can be made so by new infrastructure, particularly where this would provide wider public, environmental and economic benefits.

It is recognised however that the resources (both public and private) and infrastructure needed to establish and support the creation of sustainable new communities, particularly on greenfield sites, can be significantly greater when compared to the expansion of existing settlements through delivery of a smaller number of homes dispersed across a greater number of sites.

For new settlements, advance consideration and early delivery of strategic infrastructure requirements (education, strategic transport, drainage and healthcare) is required to achieve growth and to engender a sense of place, and identity. This is fundamental to the creation of sustainable new communities as opposed to large housing estates devoid of any sense of community and activity, and that burden local infrastructure.

However, given that the delivery of infrastructure is at the present time largely dependent upon private sector investment, then because of the significant infrastructure requirements of new settlements (as opposed to urban expansion for example), they can be more challenging to deliver. Through the Scottish Government's review of the planning system, the 'infrastructure first' approach to planning and development has been identified as a priority. Such an approach is supported but it requires new approaches and mechanisms to remove the barriers to development delivery.

#### **Regeneration of existing communities:**

The Scottish Index of Multiple Deprivation can be used to identify where we might need regeneration to deliver opportunities for socio-economic and environmental improvements in existing communities. Local Place Plans may also help to identify opportunities for regeneration.

In a Stirling context, the regeneration of existing communities is needed as there remain significant variations between different parts of the city and the wider Local Development Plan (LDP) area. The Spatial Strategy of the Stirling LDP identifies

'regeneration' areas where the approach is to address the socio-economic deficiencies through large housing allocations. The need for "Financial or in kind regeneration benefits" is the main driver of regeneration in respect of these allocations.

To date however, we have experienced difficulties in securing financial or in-kind regeneration benefits due to the requirement to meet the Scottish Government policy tests as set out in Circular 3/2012: Planning Obligations and Good Neighbour Agreements. Another contributing factor is that within these 'regeneration' areas, lower house prices often require consideration be given to the economic viability of developments when working to secure planning obligations.

It is widely accepted that regeneration benefits can be secured through LDPs provided that specific and clearly defined regeneration requirements (that have been viability tested and have a clear link to the land allocation) are identified.

### **How places could be more inclusive, diverse, creative, vibrant, safe, resilient and empowering**

This starts with local communities having an input into the decision making processes that shape their places. To be effective this requires facilitated support to enable the sharing and understanding of information to inform considerations. It also requires good design and placemaking at all scales – individual buildings, streets, neighbourhoods and settlements; bringing together a mix of people and uses; and support and protection for infrastructure that fosters connections (transport, health, cultural, digital, placemaking).

## **3. What does planning need to do to enable development and enable investment in our economy?**

### **How planning can anticipate and respond to future economic challenges and opportunities?**

Anticipating the future state of the economy is difficult, and is further complicated by the climate emergency, Brexit and COVID 19. The availability and use of up-to-date data at both a national and local scale (e.g. business start-ups, business rates, employment space take-up etc.) would enable planning to adapt and respond to the needs of the market in a dynamic way. The Digital Planning review offers significant potential to achieve improved information. The implementation of planning permission, whether that be for employment uses or otherwise, is also a good indicator of the state of the economy.

In the face of such economic challenges, Scotland will need to proactively engage international markets and remain an open and welcoming place to live, work and visit in order to maximise opportunities for business investment and to attract the levels of immigration that it needs to support economic recovery and future growth

aspirations. Planning should be seen as a key enabler in helping to create the economic and environmental conditions for this to happen.

Having policies that provide increased certainty in support of both small, medium and large business development, in the right places and circumstances, will be important. It is also important to ensure that planning applications are determined, legal agreements concluded, pre-start conditions purified and infrastructure delivered in an efficient and timely manner in order to improve investor confidence in the planning system, which is fundamental for attracting and sustaining investment. This requires funding and resourcing in planning to be prioritised in order to support consistently high levels of performance.

### **How planning could stimulate and distribute growth?**

Effective, efficient and reliable economic infrastructure, such as transportation and distribution networks, digital communication and energy systems, is required to support and sustain growth, which is an integral part of both local, regional and national economic prosperity. Making best use of existing infrastructure and investing sustainably in necessary improvements that build capacity, improve efficiency and connectivity is a general principle that could help to guide the extent and location of sustainable growth.

NPF4 could stimulate and distribute growth at a national, regional and local level through the designation of national developments and by setting the framework for LDPs and regional strategies to maximise the opportunities and benefits that can be realised from them. It is recognised that national development can act as a driver for consequential change and economic growth by unlocking the economic potential embedded within Scotland's places. The establishment of a well-connected series of local and regional plans would enable a strategic oversight of the distributions of growth and the ability to plan for, and deliver, changes in the future.

### **What type, scale and distribution of business and industrial land and premises will be needed?**

A variety of business/employment land and premises, from small-scale start-ups and live-work premises to large-scale, strategic sites that serve to attract significant investment, will be required in order provide opportunities for a broad range of sectors to establish and expand. Maximising opportunities for agile working and ease of adaption to demand is important given the current climate crisis and economic uncertainty presented at this time.

### **Where significant investment sites might be?**

Stirling is a place that is steeped in history and host to academic, financial, digital and innovation sectors and, with its strategic location, is easily accessibility to a

number of Scotland's cities and main towns. It therefore has the potential to support significant investment sites aligned to the LDP's Spatial Strategy. There is also a role for Stirling to act as a central gateway between the north and south of the country for the distribution of goods, people and services.

#### 4. How can planning improve, protect and strengthen the character of our special places?

##### What special places will need protection in the future

Special places of natural environmental interest, e.g. National Scenic Areas (NSA) or Sites of Special Scientific Interest (SSSI), are mostly defined by geographical area.

The Scottish Government's Scottish Natural Capital: Ecosystem Service Accounts, 2019 states:-

*'The benefits we receive from nature are predominantly hidden, partial or missing from the nation's balance sheet. However, by recognising nature as a form of capital and developing accounts of natural capital's contribution to the economy and our wellbeing, decision-makers can better include the environment in future policy planning.*

*There has also been strong international momentum to develop natural capital accounts.'*

In preparing NPF4, consideration and review of special places of natural heritage interest should explicitly recognise the ecosystem services they provide. Of particular relevance to the current climate emergency is their critical role in climate regulation. As well as enhancing the value of established designations, this would also allow a more informed appraisal of the inherent value of 'services' provided by undesignated land such as elevated moorlands, when subject to proposals for afforestation and renewable energy.

Prompted by concerns regarding societal and climate change induced impacts on biodiversity, RSPB Scotland's LIFE+ Futurescapes programme recognised nature reserves and designated sites are often too small and isolated to reduce biodiversity declines on their own. NPF4 provides an opportunity to promote a 'landscape-scale' approach to nature conservation and promoting the concept of networks and corridors connecting and strengthening existing sites and protected areas, enhancing and expanding them where necessary, and also creating new sites. An exemplar of the benefits of this approach is the successful multi-agency community focussed Inner Forth Landscape Initiative.

##### Where we need to talk about the concept of green belts

NPF4 should provide continuing support for the concept of green belt designation. We anticipate that they will be a key feature of the emerging spatial strategy, in line with current Scottish Planning Policy (SPP) criteria, i.e.

- directing development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space.

In light of the climate emergency, NPF4 should also give consideration to the potential ecosystem services provided by green belts, such as flood risk management and as potential locations for renewable energy and heat developments in close proximity to centres of population.

### **How we can get the most out of our productive land**

SPP introduced a presumption in favour of development that contributes to sustainable development. To support this SPP advises policies and decisions should be guided, amongst other criteria, by the principles for sustainable land use set out in A Land Use Strategy for Scotland 2016-2021 - Getting the best from our land (LUS).

NPF4 should provide clearer guidance on the contribution of the planning system to fulfilling the objectives and principles of the LUS.

### **How we can protect and restore peatland**

NPF4 policy criteria should explicitly recognise landscape scale ecosystem services provided by peatlands and carbon rich soils. This would be particularly helpful in identifying sequestration impacts of renewable energy developments and land use change, particularly afforestation. To ensure national consistency NPF4 should also standardise methodologies to assessing carbon impacts.

### **How can we plan blue and green infrastructure**

SPP advises that planning should protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking. The Central Scotland Green Network (CSGN) is a national development identified in NPF3 and covers the southern part of the LDP area. Stirling Council signed the Central Scotland Green Network Concordat in November 2013.

The Vision and Spatial Strategy Stirling LDP supports the Green Network by seeking to deliver:-

- A place with a highly functional, beautiful and vibrant City Centre at its heart.
- A place with high quality urban and built environments.
- A connected, green place: there is an established and managed Green Network of open spaces, integrated habitats, recreational and active travel routes connecting places and settlements, reconnecting Stirling with its river, and encouraging more people to move around and between them by walking, cycling and public transport.

The LDP then sets out a policy framework against which development proposals will be considered.

NPF4 should continue to support the CSGN as a national development and continue to fully support continued implementation and expansion of the green network, with particular emphasis given to the ecosystem services provided and its fundamental roles in mitigating and adapting to climate change.

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

### What infrastructure we will need in the future

We will need to:

- Set ambitious targets to increase the modal share for trips by bicycle, particularly in our cities and towns. To achieve this, we must prioritise investment in cycle infrastructure in order to deliver schemes that expand and improve our cycle networks. The principal objective should be to make journey times by bicycle competitive with other transport modes.
- Invest sustainably in new road infrastructure. The concept of sustainable investment is promoted in Transport Scotland's Strategic Transport Projects Review 2. When applied to planning, we will need to ensure that growth is planned for in a manner that reduces the need to travel unsustainably and makes best use of existing infrastructure capacity whilst maximising opportunities for sustainable travel. Investment in new transport infrastructure should only be made where necessary to address road safety issues and/or to improve operational efficiency where there are demonstrable economic imperatives for doing so or where it leads, as part of a wider package of works, towards a more sustainable transport network. In all instances, the delivery of new/improved road infrastructure must include provision for new/improved active travel and public transport connections.
- Continue to incentivise ultra-low emission vehicles (ULEV) and invest in charging infrastructure, and related projects, to encourage and sustain uptake of ULEVs. This could include providing incentives to install charge points in existing petrol stations, and requiring, through building standards or planning,

installation in public/residential car parks and alongside new housing (in-curtilage). To maximise the uptake, consideration should be also given to de-incentivising the sale and use of diesel and petrol cars through carbon taxation.

- Regarding the delivery of other infrastructure such as schools, hospitals etc. NPF4 should consider how they can be utilised to best effect, in the context of the climate emergency and diminished public funds.

### **How digital connectivity could change the way we live and work**

Improving digital connectivity could enable agile working, either from home or in work hubs, which in turn would decrease the need for lengthy commutes to single places of employment. This is particularly relevant in rural areas easily accessible from Scotland's cities and major towns where, in some areas, poor/unreliable digital connectivity is seen as a barrier to flexible working.

### **Where our natural resources for energy are; and what emerging and future technologies we will need to plan for**

Energy security (resilient, reliable and affordable) will be needed to move away from the use of fossil fuels, particularly if the government is to deliver on its commitment that all new homes must use renewable or low carbon heat from 2024 - "Government's Programme for Scotland 2019-20".

## Part 2: Response to background information notes of Scottish Planning Policy topic areas.

### People

#### Green Infrastructure

*What is the potential for blue and green infrastructure to support our wider objectives on climate change?*

The delivery of fully integrated, multi-functional blue-green infrastructure has the potential to support wider objectives on climate change, both in terms of increasing place resilience to extreme weather events, such as flooding, but also in terms of urban shading and cooling, and carbon sequestration. Consideration should be given to how the [Building With Nature Standards](#) could be embedded in NPF4.

*Should the potential for national standards/requirements for green infrastructure be explored? Should NPF4 include policies specific to major developments to ensure that the potential for blue and green infrastructure is maximised?*

This is encouraged because, despite current policy and guidance, there remain significant inconsistencies in the use, continuity, and design quality of SUD systems and associated features, particularly in relation to new housing development. The vast majority of schemes are designed to drain surface water via traditional underground piped systems to some degree, which brings with it a number of potential issues relating to urban design, flood risk, water quality and biodiversity.

We would therefore agree that the potential for national standards/requirements for blue and green infrastructure should be explored, with the potential that NPF4 could include blue and green infrastructure policies for both major and national developments. It is important however, that local authorities have the ability to influence any such standards/requirements given the responsibility for maintenance of sites under Section 7 agreements.

NPF4 can best ensure that blue and green infrastructure policies are given appropriate weight relative to other issues i.e. placemaking and affordable housing, by simply stating that they should, but also by making clear that they are a key component of helping to deliver on these other policy areas.

*What more can NPF4 do to support allotments/community growing places?*

NPF4 can further support allotments/community growing places, by firstly raising their profile within any document, and thereafter making clear their potential contribution to placemaking, green infrastructure and health and wellbeing policy objectives.

*Is there a need to safeguard areas of green infrastructure which provide flood risk management services, such as floodplains, river corridors and flowpaths?*

We consider that there is a need to safeguard areas of green infrastructure that provide flood management services (such as floodplains, river corridors, and flowpaths/areas known to hold/channel water in storm events). The well-established principles of avoidance relating to development in flood risk areas should form an integral part of NPF4. It is also recommended that the most up-to-date [climate change allowances](#) should be used to define functional floodplains.

## Health

*Are there other aspects of health that are capable of being influenced by the planning system?*

Other aspects of health that are capable of being influenced by the planning system could include accessibility to buildings and spaces for those with physical/cognitive disabilities.

New Planning Act requires consideration to be given, before planning permission is granted for national and major developments, to the likely health effects of the proposed development. Is there the capacity/understanding/knowledge for planners to do that – or is there a need for greater collaboration with Health professionals? There may be a role for NPF4 to provide policy direction/guidance and emphasise linkages with policy areas such as placemaking and green infrastructure.

*How can NPF4 policies on topics such as placemaking, active travel, housing, green infrastructure, town centres and air quality effectively deliver health policy objectives?*

NPF4 policies relative to placemaking, active travel, housing, green infrastructure, town centres, and air quality can all effectively deliver health policy objectives only if their influence on health and wellbeing is first recognised within NPF. Thereafter clear policy requirements should be set, with the message that these have equal, if not greater, weighting in development management assessment of proposals as the delivery of housing 'numbers'.

It is important to realise that wording within Policy documents can only take the issue so far; it needs a culture change, with greater connections, collaboration, and sharing of knowledge to be transformational.

*How can new development be provided in a manner which ensures sufficient health care services such as doctors' surgeries are available for existing and new communities?*

Experience has shown that it is difficult for planning alone to ensure that new development is provided in a manner that ensures sufficient health care services, such as doctors surgeries, are available for existing and new communities. Whilst

larger housing allocations could include a requirement for new health facilities, and/or policies and guidance requiring developer contributions, the delivery of such facilities is ultimately not within the gift of either planning authorities or developers who often challenge such requirements. Greater and earlier working with local health boards, could start to address the issue, but it is not solely a 'Planning' issue.

*Are policies needed to ensure that particular types of development do not undermine the health and wellbeing of communities, including the prevention of over-provision and clustering of certain food outlets? Can the planning system address hot food vans which sell predominately unhealthy food?*

We consider that it could be appropriate for NPF4 to provide policy guidance to prevent over-provision and clusters of certain types of food outlets, much in the same way as current SPP addresses betting shops and high interest lenders. A key difficulty is defining 'certain types' of food outlets and what would form a cluster. To be effective this requires guidance from the Scottish Government. As with this, NPF4 should have a requirement for LDPs to tailor such policies to local circumstances, and be evidenced by the likes of City Centre strategies/health checks etc.

In line with Stirling LDP's Mobile Hot Food Outlets policy, it is considered that the planning system can address mobile hot food vans, insofar as it can set circumstances and locational criteria restricting their provision.

*How best can planning policy engage with the promotion of healthy diets?*

Planning policy can engage with the promotion of healthy diets via policies which encourage/require the inclusion of local food growing opportunities such as allotments, orchards etc.

*Do our policies sufficiently support the promotion of mental wellbeing or is further action required?*

We consider that further action is required to support the promotion of mental wellbeing, to ensure that the importance of it is given equal consideration to physical wellbeing. The quality of places is considered to have a direct impact upon these.

## **Housing – Affordable**

*Is the existing policy fit for purpose?*

The affordable housing policy works well but if the contribution is to be set at a national level there should be a local exemption to allow a specific affordable housing percentage to be achieved, taking into account pressured/highly pressured areas within the LDP area.

## Housing - General

*Do we need to revisit the overall aim and objectives of our housing policy? Should policies continue to focus on delivering homes and the quantum of land available or are there a wider range of objectives and approaches that should be built into the policy?*

Housing land allocations should take into account Housing Need and Demand Assessments (HNDA) but be realistic that there are barriers to delivery of the required number of homes. Whilst house numbers are important, placemaking needs to be taken into account and other factors should frame whether the numbers can be accommodated, such as landscape and infrastructure capacity, environmental considerations, cultural heritage and archaeological designations. The 'gatecheck' process for LDPs should set out what the HNDA says is the need and demand but then provide evidence for a policy view on the number of new homes the planning authority realistically thinks it can achieve over the LDP period, based on the evidence above. This will help inform the spatial strategy, which should be a key component of the gatecheck process.

*Should the 5 year effective land supply continue to be a means by which the effectiveness of plans is measured? What method should be used to calculate the land supply? Should the definition of 'effectiveness' be reconsidered?*

We accept the need for NPF to have a trigger for the further release of land where sufficient land supply is not being maintained, however the current 5 year trigger in SPP is problematic and opportunity should be taken to review this in NPF4. The current trigger appears arbitrary and in effect gives developers the opportunity to downplay their build rate and local authorities a reason to inflate it, neither of which is helpful or achieves the goal of delivering the right development in the right place and providing homes where and when they are needed.

The 5 year trigger measures the rate of delivery of new homes, which local planning authorities (LPAs) are directly responsible for. LPAs are then tasked with the allocation of land capable of being developed for housing to meet their targets. The concern is that councils and communities are effectively penalised for failure to meet housing targets due to the market moving at different rates.

To address this issue, the trigger should move away from the automatic assumption that more housing land needs to be allocated, and instead there should be more emphasis placed upon developers developing their sites and what is reasonably required from LPAs to enable this.

*How can we achieve a more effective system which ensures that the right land is allocated and then developed and that where this is not achieved, that action is taken.*

It would be advantageous for NPF to be clear on what, if any, will be a trigger in terms of identifying if housing land policies in the plan are to be considered out of date. Currently the trigger of a sub-5 year land supply is not adequate as there is

no justification as to why a 5 year period has been chosen, nor is there guidance on what authorities should do in the event that this presumption kicks in. It should not be a given that a shortage in the build programme necessitates the release of land. It should also be made clear whether LDPs will have the opportunity to include a local policy on further land release criteria in the event that such a shortfall does require such a release.

*What role should housing land audits play in establishing the land supply as implementation of the plan progresses?*

Housing land audits (HLAs) should be seen as a corporate tool to direct investment in infrastructure and help budget planning (i.e. Council Tax income). It should be made clear to the development industry that timescales and build rates supplied to inform the HLA need to be realistic, achievable, and should not be artificially inflated/suppressed. More rigorous site assessment processes are required to ensure that all sites included in an LDP are achievable.

To ensure that housing numbers are being met, changes to densities/designs that have previously been desired by house builders may be required. LPAs currently have little evidence on housing preferences in terms of design/layout etc. and are frequently told by developers that their house-styles reflect the 'market demand'. The Scottish Government/LPAs may wish to carry out their own research to verify this and at the very least spark a discussion with developers as to the design and layout of their sites.

## **Housing Discussion Technical Paper**

The proposals set out in the paper are generally welcomed as an attempt to remove a large portion of the debate around housing land calculations and focus LDPs to deliver the right housing in the right place. However, the proposals raise a great deal of concern, particularly with regard to the generosity levels being established and added to HNDA estimates of need and demand.

The HNDA process is intended to inform a policy view of the number of new homes the planning authority reasonably expects could be delivered in the timescale under consideration. To add a generosity level to the HNDA estimates, at such an early stage, is concerning as it would pre-empt a policy view at a LDP level (supported by robust evidence) as to what is achievable in that time frame.

The generosity level is intended to ensure that enough land is allocated to meet the identified targets - it is here that the generosity level is appropriate, not at the HNDA stage. It would be welcomed however to have a robust methodology and consistency across Scotland with regard to generosity level. There is no objection to a flat rate of generosity being applied across Scotland as this would make housing land calculations easier to defend during the proposed gatecheck process. It is recognised that in other authorities with different housing needs and market demand that a regional approach to setting a generosity should be taken.

We agree that the HNDA should be used nationally as this provides a consistent evidence base.

For the first round of indicative regional spatial strategies (RSS) and timelines to feed into NPF4 it may be impractical for those outwith former strategic development plan (SDP) areas, such as the Forth Valley regional group, to work together to alter housing market areas. However, there is scope to do this in the future should a formal RSS be taken forward by Forth Valley.

HLAs generally programme the housing output over the current LDP period, not just the 5 year period. The 5 year effective period is however an important consideration for HLAs as maintaining a 5 year supply of effective land is currently a trigger for paragraphs 32 and 33 of SPP. The validity of forecasting over the 5 year period or longer is low and therefore there is a significant concern over LDPs having to show a 10 year supply. However, this could be done if there was acceptance that this would include sites that are not currently effective but would expect to be effective within that period.

In terms of HLA involvement by the Scottish Government, the Scottish Government should clearly set out process and procedures and what is expected to be covered by HLAs. It would be beneficial for a Scottish Government representative to perhaps be involved in the HLA meetings to ensure that they are aware of emerging issues from audit meetings.

### **Housing – Affordable**

*Is the existing policy fit for purpose?*

The affordable housing policy works well, but we suggest that there should be a local exemption to allow a specific affordable housing percentage to be achieved, taking into account pressured/highly pressured areas within the LDP area.

Much of the funding available for affordable housing is reliant upon the Strategic Housing Investment Plan (SHIP) so the continuation of this is essential to help realise affordable housing targets.

### **Housing – Specialist**

*Given our housing policy commitments and projected population and household change, what further changes or additions are required to ensure planning does all it can to support the delivery of housing to meet different needs?*

It is important to give local planning authorities the correct tools to ensure that specialist housing requirements can be adequately controlled through planning policy. For example, internal layouts and door widths for wheelchair accessibility cannot be controlled through planning legislation.

### Business / Employment

*How should NPF4 take account of generative opportunities resulting from City and Growth Deals? How can changes to the planning system, including on strategic planning, tie in with the activity of Regional Economic Partnerships.*

There is an acknowledgement that City and Region Growth Deals provide a different context for economic development, particularly at a regional scale. The constituent parts of these deals are, in the main, a series of individual projects. These have required business cases to be prepared, and which, through their inclusion in the Deals, have been assessed by both Westminster and Holyrood governments, and provide city, region and wider economic benefits at a level worthy of specific support and investment.

Therefore, first and foremost the City Region Deals, and their projects, need to be represented within NPF4. This should include an understanding of the intended economic outcomes and impacts of these, and an identification and expression of the planning and spatial implications of them. In considering this at a national level, NPF4 may also offer the opportunity to itself identify generative opportunities at a national scale.

Thereafter, much as SPP currently requires Development Plans to do, NPF4 should require Development Plans to align with relevant local economic strategies, of which any relevant Deal should form part. This again should include consideration of specific intended outcomes of Deal project(s) and whether there are elements of the Development Plan spatial strategy which can build upon these. This is also pertinent to iRSS.

Currently, SPP requires Strategic Development Plans to identify appropriate locations to cluster business. With the abolishment of SDPs through Planning reform, this is a role that NPF4 and/or iRSS should be filling, and could include the potential City Region Deals etc. provide as part of that.

*How can we link economy and business with place and placemaking considerations, at different scales?*

At the macro level it requires NPF4 to reinforce a whole system approach to place, and placemaking, by conveying a strong message that economic, business, health, and place outcomes are interlinked. Business in its widest sense also often constitutes a key part of a successful and attractive individual place. This message, and those links, need to be explicit within any document that seeks to put placemaking at the heart of it.

This needs to be done in a manner that does not also undermine the overarching place quality requirement, or a suggestion that any business development is 'good' development (therefore mirroring the concerns raised relative to housing land requirements versus Placemaking objectives)

It should require development plans to produce a Spatial Strategy that includes business land/space. This should be derived from clear national, and local analysis, over business land requirements, and should be place based. There should be demonstrable links within the Spatial Strategy over business land allocations, with that of residential and other uses, including transport links and infrastructure – particularly active travel and public transport. Mixed use developments should be encouraged.

Whilst having such a strategy is key, the system should not solely have a top-down approach. There should be sufficient flexibility within it (through policies and/allocations) to allow for ingenuity, start-up businesses/enterprises etc. which are far more likely to quickly adapt to changing economic circumstances over a period of time than a Development Plan.

At the very micro level (individual buildings) there needs to be an understanding that good design should not be seen as solely, or primarily a residential development issue. A significant proportion of the population continue to spend a large amount of their time in, or visiting, a work environment. Therefore, quality of buildings, and their wider environs are equally important in terms of place. Promotion and use of sustainability standards such as BREEAM, which is well established, or newer ones such as 'WELL' and 'BCO' should become common place.

## **Mineral Extraction**

*How far should the planning system go to safeguard mineral deposits?*

Within SPP the extraction of workable coal reserves prior to permanent development is promoted to prevent sterilisation of the resource. The policy principles around surface coal are questioned given that the demand for coal is falling significantly as we move towards the decarbonisation of our heat and energy supply. In economic and policy context, therefore it is unlikely that any new mining proposals would be viable proposition over the timespan of NPF4. NPF4 should remove this policy provision.

## **Rural Development**

*How can NPF policy criteria most effectively contribute to the Planning Act outcome of increasing the population of our rural areas?*

We consider that there is a need for NPF4 policies in relation to supporting rural development to have a strong emphasis on how it will bring multiple benefits to depopulated areas. There is a need to give people a reason to live there, and is more sustainable than the simple provision of additional housing.

*How should policy criteria be framed to recognise the needs of different types of rural areas?*

It is considered extremely important that NPF4 continues to take a differentiated policy approach to development, including housing development, in rural areas

categorised as accessible/pressured and remote. The framing of any such policies would first have to establish what its intended outcomes were to be, for example in 'sparsely populated areas' is the goal to have more people living there, or are there good reasons why they are sparsely populated that would justify their remaining so?

In a Stirling context, the LDP area encompasses two of the three broad categories for rural areas identified in SPP; these include,

- Both accessible and pressurised areas of countryside around towns and cities, i.e. the southern LDP area.
- More remote and sparsely populated areas, i.e. the northern LDP area.

The overall impression is that the LDP's rural localities are generally socially and economically stable, as such, from Stirling's perspective, we would consider that there is no pressing need for NPF4 to modify the categorisation of rural areas as it applies to the Stirling area. However, our accessible/pressured (high and intermediate) and remote rural areas should be clearly defined in NPF4, and related policy should be more prescriptive about the types and scales of development that should be permitted there.

*Which planning policies need to be more permissive to support sustainable rural development and help sustain and grow communities?*

Care is needed if considering which planning policies need to be more permissive to support rural development and help and sustain and grow communities. Based on experience, we do not believe that a 'one-size-fits-all' national approach is appropriate.

Whilst this may be appropriate in certain circumstances, there are others, such as the one faced by Stirling where the majority of countryside is accessible and pressured, and experiences a considerable demand for new residential properties – often resulting in the siting of single houses in the countryside with no demonstrable benefit of growing rural communities in a sustainable manner.

In this context, policies that are too permissive have the potential to erode the character of the countryside and harm the environment. The likely common answer will be continue to guide most new residential development to locations within or adjacent to settlements and restrict new housing in the countryside outwith settlements.

*What more can be done to recognise the transformational role of housing in relation to the wider rural economy and the need to deliver untapped housing demand?*

Firstly, it would be beneficial for NPF4 to provide relevant examples of how such development can be 'transformational'. Equally, in terms of 'untapped housing demand' NPF4 should be clear what that demand is, and whether it is appropriate, in terms of sustainability and impact, to meet it. If, for example, there is an untapped demand for small starter homes in rural settlements, then policies should be clear that this is what should be delivered.

*What policy criteria is needed to support rural businesses?*

To support sustainable economic growth within rural areas, consistent with the policy principles of SPP, NPF4 should support economic activity in and around locally designated areas considered suitable for employment related developments, close to settlements which are accessible by walking/wheeling, cycling and public transport, or can be made so by planning conditions, or where redundant or underused buildings can be used. Care is needed however, to ensure that such activity does not undermine the role and function of rural villages.

NPF4 should also continue to support agricultural diversification and small-scale development linked to tourism and recreational activities where there is a locational need, and in doing so should take every opportunity to improve accessibility and connectivity.

## **Town Centres**

*What issues are shared across all town centres and therefore suitable for inclusion in a national policy, and what matters are more likely to require locally driven policies and approaches?*

The Stirling LDP envisages the city centre as vibrant, attractive to live in, work and visit, and is the primary location for a mix of uses, including new and better retail space, commercial leisure, office, community and cultural facilities.

Our LDP policies highlight that the city centre, town and local centres that make up the Network of Centres, will be preferred locations for uses which generate activity and significant footfall, including retail, offices, food and drink, and community and cultural facilities.

NPF4 should continue to provide the strongest support for development plans and development management decisions to be based on town centre first principles. This includes preventing underperforming out of centre retail parks, shopping centres and future mixed use developments from introducing alternative uses that would potentially undermine currently fragile town centre economies. Town centres are hubs for all communities and are also highly sustainable locations; a natural focus for all forms of travel and inherently cater for multi-purpose trips.

However, we recognise that there is no one-size-fits-all solution when it comes to addressing the challenges facing our town centres. The most successful town centre strategies clearly have an embedded understanding of the history, characteristics, performance and needs of the place. NPF4 should therefore make provision to enable LDPs to adapt policies and approaches to accommodate the circumstances and requirements that are unique to all town centres across Scotland.

### Sustainability & Climate Change:

Sustainability - proposed key objective of NPF4: *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 emissions by 2045. :*

Climate Change - proposed key objective of NPF4: *to ensure planning policy results in spatial and land use change that facilitates Scotland's ambition to have net-zero emissions by 2045 and other statutory emissions reduction targets whilst supporting communities and businesses in making the changes needed to meet the targets.*

These two proposed objectives reveal tensions in the general direction of travel of national planning policy as it relates to environmental/climate change and economic development issues. This is summed up in the think piece - [Scotland's Environment](#):

*'To overcome this tension, NPF4 will also require a new, more integrated approach to policy development and regulation – something planning is well placed to take a leading role in. NPF3 already went some way to providing an integrated approach for the built environment. However, to date, Ministers have considered their Economic Strategy as supreme. NPF3 was described by Ministers as “the spatial expression of the Government Economic Strategy”.*

*If the government is to achieve its climate change targets, NPF4 we will need a new hierarchy, which puts improving the environment and society first, setting an ambitious, optimistic and coordinated vision for the better, sustainable, Scotland we need in 2050. It must set a route map for the economic strategy to follow.'*

For NPF4 to deliver for the climate emergency, its policies (which will also now have to take account of the economic impacts of the pandemic), should not allow economic growth to trump environmental considerations; this is the only way that we will move away from business as usual. Such an approach has allowed well intentioned aspects of current SPP to be supplanted by economic benefits and/or development viability considerations. Alternatively, much more rigorous support should be provide by government regulation to ensure that economic proposals with an environmental impact require much more effective environmental mitigation or carbon offsetting, for example the provision of heat networks and the installation and operation of low and zero-carbon generating technologies.

Related to the above point, 'higher level' NPF4 policy wording will then inform lower level, albeit still national policies. For example, a consideration in the Climate Change information note is:

*'The policy criteria needed to ensure that new developments contribute as far as possible to emission reduction targets. In particular, how can NPF 4 policies on*

*topics such as placemaking, housing, transport, green infrastructure, energy, waste and flooding deliver emissions reduction objectives?'*

With this in mind it follows that ambiguous and/or aspirational and/or unclear wording of an 'overarching' NPF4 climate change policy will impact upon how these subsidiary policies are framed and worded. It can also be anticipated that these policies will have locational/spatial elements which will inform our next LDP's spatial strategy. The more concise and clear these policies are the easier it will be for planning authorities to develop and defend an NPF4 compliant spatial strategy.

This is further supported by observations in the [2019 Progress Report to the Scottish Parliament - Reducing emissions in Scotland](#) (Committee on Climate Change – December 2019)

*'The foremost challenge is not to produce a quantified, optimised pathway for emissions reductions in each sector; the greatest need is for improved Scottish Government policies and stronger governance to drive a rapid, sustained transformation to a net-zero Scotland.'*

## **Flooding**

*How can we ensure that new developments are resilient to increased flooding due to climate change?*

NPF4 should continue to adopt a precautionary approach to all forms of flood risk i.e. avoiding areas of flood storage and conveyance capacity, low points and flow paths. NPF4 should require [up-to-date climate change allowances to be taken into account in flood risk assessments](#) in order to protect new development from increased flooding due to climate change.

## **Historic Environment**

*What is needed to ensure policies safeguard Scotland's valuable historic environment assets and to manage potential conflicts with other interests?*

There is a need for policies to properly address issues of balance in relation to the historic environment and climate change adaptations and installations. Current historic environment policy is insufficient to address this. Development proposals that result in climate change benefits and that have an impact on the historic environment are often difficult to assess given that weight that should be afforded to each consideration is often unclear; particularly considering that the protection of the historic environment and development that contributions to reduction in greenhouse gas emissions are embedded within the sustainable development criteria.

There is a need for a more structured policy consideration to address this conflict and the consequential impacts. NPF4 should therefore include policies and technical approaches that minimise impacts whilst maximising carbon savings/reductions. Consideration should also be given to provisions that would

allow planning authorities to adapt policies for specific areas/designations and/or building-type.

NPF4 should foster and support access, understanding and engagement with the historic environment. This is essential to widening knowledge and understanding to sustain the care and protection of it. Given the projected ageing population, improved access to the historic environment is likely to become a more pressing issue - policy can best ensure support for the adaptation/creation of an accessible historic environment.

In terms of battlefields and archaeological sites, NPF4 should retain the policy provisions within SPP paragraphs 140, 150 and 155 which are crucial to the management of archaeological mitigation in Development Management. Also, the same broad recommendation is also made for the retention of given its wealth of technical detail in PAN2/2011, which the overall approach appears to imply the loss of.

More generally, the proposal seems to place too a great a reliance on HES documents i.e. Historic Environment Policy for Scotland and Our Place in Time and Managing Change in The Historic Environment Series, which are not statutory and lack technical detail, for example they do not mention local Historic Environment Records (HERS). HERS provide crucial, highly detailed and up to date information on local archaeological resources which are not replicated at a National Level.

### **Infrastructure and Delivery**

*What should be the key priorities for national policy to embed an infrastructure first approach into development plans?*

Infrastructure has generally been seen as transport and energy etc. but for local planning authorities some of the key issues arise over the timing, funding and provision of education infrastructure. NPF4 should take into account all types of infrastructure that is required for development, including health.

*What key factors should be included to future proof development plans so that they can anticipate and plan for the emergence of new infrastructure technology?*

NPF4 and LDPs should take account of emerging technologies and be flexible in how these might be delivered in the future. With LDPs moving to a 10 year timescale it will be particularly important for a fine balance to be struck to allow costings and timings to be known based on current trends and technologies but allow plans to be updated to reflect changes in technology.

### **Placemaking**

*Does this policy need to change – if so, in what way?*

The policy requires a greater emphasis and alignment with health and wellbeing policies and outcomes.

*What is the most effective way for NPF4 to give high level support for placemaking principles that integrate with other policy documents, such as Creating Places: a policy statement on architecture and place for Scotland?*

NPF4 can be most effective in providing high level support for placemaking principles, by re-emphasising the importance of placemaking, in the face of the 'numbers game' often employed by developers. Concern that the recent housing technical paper issued would continue to result in conflict – with a very numbers driven approach, minimal local influence, and no discussion over Placemaking issues within it.

We consider it important for NPF4 to recognise that national policies on Placemaking cannot address everything. More detailed principles, policy and guidance, should be required at a LDP/local level, in order to truly 'place-make' and address local context and issues.

*How can placemaking policies support other policies, such as housing and green infrastructure, to meet the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people?*

As a starting point, NPF4 placemaking policies and document structure can support other policies by first ensuring appropriate cross-references to them. Thereafter the six qualities of place could be utilised and provide examples of what could/should be considered under each – this could then help link to other national policy documents and/or other NPF policies (housing/green infrastructure etc.) Additionally, it could provide a starting point at a national level for development management considerations.

*Does the climate change emergency mean that the policy needs strengthening or revision?*

Consideration of 'place' and Placemaking in planning decisions (Development Plan and Development Management) is considered a key element in tackling the climate change emergency. That message is considered to require strengthening.

*Is there scope to make more of this policy area in order to encourage planning to actively enable the delivery of high quality development?*

NPF4 should consider encouraging and promoting the need for planning to collaborate with other parties within local government and wider (such as the Place Principle) to enable the delivery of high quality development.

## **Transport**

*How can we strengthen our policies to ensure that our intentions are followed through in decisions and development on the ground?*

With regard to modal shift and the climate emergency, there are a number of national, regional and local strategies, but to date, as a country we have not wholly committed to this beyond an aspirational strategy. These need to be enshrined in a statutory basis which will move beyond the aspirational. This will ensure that

policies have teeth and ultimately commit developers to delivering outcomes which are aligned to the National Transport Strategy (NTS2).

*How do our policies need to change to ensure that the transport needs of local communities and investors are met?*

As above. Policy must be aligned to the NTS2 to ensure that the transport hierarchy is delivered through new development.

*How do we improve the transport appraisal process within the development plan process to deliver the NTS, including consideration of cumulative impacts if development on the transport system?*

The DPMTAG & STAG processes must be refreshed so that they are in step with NTS2. The assessment criteria used previously were based on a 'predict and provide' approach to transport infrastructure. However, given the climate emergency and the global pandemic, it is essential that NPF4 embraces a 'demand management' approach to transport infrastructure.

Sustainability must therefore be at the heart of our decision making and site selection. Through policy and decision making we can deliver meaningful modal shift to lessen the cumulative impact of development on our transport impact through improving the spread of modal share.

*How can our policies locate development to reduce the need to travel unsustainably?*

Sustainability needs to be at the core of LDP site selection. Development which can build on place principles, benefit from density and reduce the need to travel is preferable.

However, should a site come forward that is outwith this criteria, it should be demonstrate how it contributes to sustainability, i.e. active travel choices that conform to Cycle Scotland and Sustrans design standards to offer people safe and segregated infrastructure, prioritises public transport and provides futureproofed ULEV charging infrastructure.

Also, policy must give planning the ability to encourage/seek contributions to car and bike share schemes where they have been identified as mitigation in transport assessments.

*Make use of existing sustainable transport capacity?*

Again, this is related to site selection. Developer contributions can also play a bigger role in maximising/improving existing capacity. Policy must be clear that for development that is on/near existing sustainable transport infrastructure, contributions for its improvement will be sought where necessary.

Taking rail travel as an example, it is considered that there is significant capacity within rail infrastructure that could be utilised to support development in

appropriate locations. The issue of journey time dis-benefits should not be seen as a barrier when it comes to the instatement/re-instatement of rail stations/halts. NPF4 should also support the provisions of the Act, which requires regard to be given to preserving disused railway infrastructure, by identifying appropriate buffer zones to ensure that such infrastructure is safeguarded from development and future proofed to allow railways to be brought back into use without affecting residential amenity (noise and vibration) or resulting in the permanent loss of green infrastructure/active travel routes.

*Enable active and sustainable travel to local amenities, healthcare, education and workplaces for all?*

Again, this comes down to site selection and making best use of existing infrastructure to access services and amenities by active travel and public transport. In February Paris were trialling the concept of 5 minute neighbourhoods, based on the premise that each community should be within a 5 minute active travel/public transport journey to all that they need. Within a city with the density of Paris this is achievable, but there are principles which could be adapted and applied to Scottish policy.

*Require the provision of shared transport such as car clubs, revise parking standards and limit access for private cars?*

Stirling Council agrees with this, however the government must ensure that it is also committed to this. In recent history a Council decision to refuse a planning application on the grounds of its intensification of car use was overturned on appeal.

Business hubs, car free residential development – car clubs could be secured through legal agreement if demonstrated in transport statement to achieve modal share targets

*Help to align regeneration priorities with existing transport infrastructure capacity and/or areas where strategic interventions are made?*

A larger discussion is required with Community Planning Partners/Community Bodies to ensure that future LDPs are the land use expression of Local Outcome Improvement Plans and Local Place Plans.

Meeting the transport needs of communities is essential, particularly those who require regeneration intervention. Stirling Council is committed to tackling transport poverty and providing a range of equitable options that provide opportunity to access jobs, services and amenities. This is a stated objective of the LTS and through project work and working with our CPPs the Council is delivering projects, such as Walk Cycle Live Stirling which seek to address this.

Planning policy needs be aligned to this to ensure that regeneration development also addresses these issues.

*Combine reduced emission with our placemaking objectives, for example through designing-in accessibility, promotion of car-free development or rebalancing requirement for car parking.*

Through many of our current transport projects, Stirling Council is committed to taking initiatives such as car free days, rebalancing streets in favour of pedestrians and active travel and placemaking. Stirling Council embraces Designing Streets and Roads for All principles through the Planning process but would welcome this being further strengthened.

*Promote higher density development to support the use of sustainable transport options and/or ensure greater accessibility of facilities?*

We support the principle of higher density development at a strategic level (through clustering/grouping of development sites or expansion of existing settlements) and would welcome this being promoted. However, at a local level, the promotion of higher density development is not compatible with the need to secure high quality, multifunctional open space with fully integrated blue and green infrastructure in the interests of placemaking, climate change resilience, biodiversity and the protection of the water environment.

*How can our planning policies support transport connections outwith Scotland taking into account the context of the UK's exit from the EU?*

This is a larger issue than planning policy alone, however planning seeks to promote sustainable economic growth, and so within the context of Brexit, transport connectivity will continue to be needed.

*To what extent can our planning policies reduce the connectivity disadvantages experienced in island, rural and remote rural areas, including provision of access to vital public services (education, health care etc.)?*

We would welcome policy which would strengthen the case to ensure that developers contribute towards active travel and public transport connectivity in a rural setting. The Council currently runs a rural Demand Responsive Transport scheme for local people. Development should complement/contribute to this and other options such as eBike share and car clubs, where appropriate.

*How can we ensure our policies promote a transport provision first approach to development, with planning authorities working collaboratively with developers, communities and infrastructure providers to support delivery?*

Site selection and refreshed DPMTAG process aligned to NTS2 is essential. Sites which can meet development requirements and sustainable objectives must be prioritised. Engaging the communities, transport providers, etc. in this process is crucial. Having robustly assessed sites that are then selected for LDPs will help to ensure that we have truly plan-led system, which can deliver upon the NTS2.

*How should these policies read across to wider policies on planning obligations prospects for an infrastructure level arising from the Planning (Scotland) Act 2019?*

NTS2 proposes a Sustainable Investment Hierarchy for future transport infrastructure. To deliver upon this the current STPR2 consultation is currently developing a long list of projects which will be prioritised based upon this hierarchy. Where appropriate development must be obligated to contribute towards this infrastructure delivery. Furthermore, the Sustainable Invest Hierarchy should be promoted at a national level to ensure that LDPs deliver upon the NTS2.

### **Vacant and Derelict Land**

*What more can NPF4 do to support and encourage appropriate opportunities for the redevelopment of vacant and derelict land?*

Local planning authorities should be required as part of their gatecheck process to show how their spatial strategy and land allocations take account of VDL sites and propose that they are reused.

*Are there circumstances where it would be appropriate for developers to be asked to provide evidence that development on brownfield land is not viable?*

Whilst local flexibility is required there should be a presumption in line with the carbon reduction and climate change agenda that brownfield land should be first preference to accommodate the land supply targets before greenfield development is considered. This would require a strong policy context in order for LAs to resist unwanted greenfield expansions and to direct developers to sites that are brownfield or VDL. It also has to be recognised that there will be a financial impact on developers as a result of this potential policy approach in that development costs will be higher due to likely land values and remediation works required prior to development.

**Part 3:** Response to the recommendations made on the possible priority areas for change to be considered as part of the review of SPP – *Ironside Farrar, Research Project: Adoption of Scottish Planning Policy in Local Development Plans.*

Ironside Farrar Recommendation	Stirling Council Response
<p>1. <i>NPF should clearly set out the remit of the Local Development Plan making it clear that national policies are not required to be repeated in Local Development Plans, unless justified amendments have been made.</i></p>	<p><b>Agree.</b> The facility for Local Planning Authorities (LPAs) to make justified amendments to policies to suit local circumstances is seen as very important, and a crucial part of Plan-making and placemaking.</p>
<p>2. <i>NPF should include a clear and concise set of national policies to enable greater consistency in decision making across Scotland based broadly on the Principal and Subject policies included in the 2014 SPP. This will ensure consistency and support an efficient Planning Authority function. Specific criteria for the assessment of planning applications was considered useful.</i></p>	<p><b>Agree,</b> subject to sight of, and consultation on, what these ‘specific criteria’ are. It is also worth noting that consistent policy wording does not necessarily lead to consistent decision making.</p>
<p>3. <i>NPF should clearly identify where there is flexibility to adapt policies at a local level. This would ensure policies can be varied where appropriate to reflect the varied nature of Scottish planning authorities. Through the research examples have been identified where SPP policies have been changed or adapted to meet local circumstances.</i></p>	<p><b>Agree.</b> Whilst agreeing that LPAs should have the ability to make justified and reasoned amendments to policies to suit local circumstances, do not consider that it is for NPF to predetermine what these may be in all instances. LPAs will be in the best position to consider that during Plan preparation and evidence gathering required for the intended gatecheck.</p>

4. *NPF should consider the inclusion of policies that frequently appear in LDPs but that are not covered in SPP whilst retaining a level of flexibility to cater for local circumstances.*

**Agree.** Would agree that NPF4 should consider the inclusion of policies that appear frequently in LDPs that are not currently covered in SPP, but only where (i) there is a demonstrable need/benefit for policy direction at a national level (ii) a high degree of correlation of policy direction at an LDP level across the country. Otherwise, there is a danger that NPF4 becomes unwieldy, with LPAs writing their own versions of the policies to suit their own circumstances in any event.

- **Developer Obligations:** Whilst national policy support for the pursuit of appropriate developer obligations is considered worthwhile, the nature and scale of those are something that requires to be tailored to local circumstances, and therefore for the LPAs to expand upon.
- **Householder Development:** Would question whether this was necessary at a national level? Would argue that this is a subject that is easily placed within LDPs, and allows LPAs to tailor to circumstances and issues relative to them.
- **Advertisements:** Again, is policy direction really required at a national level? This may be something for which LPAs want to have their own approach. For example, relative to Listed Buildings within historic town centres, free standing ones as part of income generation etc. for the Council.
- **Cemeteries/Crematoria Provision:** May be worthwhile for national policy to address and ensure provision/land safeguard within LDPs. It could also provide clarity over relationship between provision and location of cemeteries relative to nationally important and protected sites, such as Battlefields.

	<ul style="list-style-type: none"> <li>• Social, Community and Health Facilities: Worth considering a national policy position, particularly if it provides greater clarity over expectations regarding working relationships with NHS relative to planning for Health Facilities.</li> <li>• Contamination: Agree there is scope for national policy(ies) if there is a high degree of correlation in terms of approach and requirements relative to contamination.</li> <li>• Pipeline &amp; Hazard Consultation Zones: Agreed that the inclusion of pipeline infrastructure as part of the existing SPP policy direction on major-accident hazard sites is appropriate from both from a Development Planning and Development Management perspective.</li> <li>• Public Art: Whilst acknowledging that this can be important to place, would question whether this is required as a separate national policy. Rather its contribution should be promoted as part of good Placemaking. It then allows LPAs to consider what works best for them in terms of the roles and responsibilities relative to the delivery of public art.</li> </ul>
<p>5. <i>As widely advocated through the consultation process, NPF should enable planning to support and deliver climate change mitigation and adaptation, whilst recognising the role of Building Standards and other regulatory functions. NPF should take the opportunity to promote aspirations for active travel, energy efficiency, waste reduction, heat networks, reducing energy demand and other means of reducing carbon emissions and, where practicable, look to increase those</i></p>	<p><b>Agree.</b> This should be an important function of NPF4. However, as part of that it should seek to provide clarity regarding where the role of Planning stops, and where the likes of Building Standards starts. If there is a desire or a need to have Building Standards working alongside Planning Officers then this should be explicit.</p>

<p><i>associated minimum standards currently set out in relevant regulations.</i></p>	
<p><b>6.</b> <i>Where possible, policy principles throughout NPF should continue to be cross referenced to relevant detailed guidance, adding weight to the policy requirement. While SPP provides sufficient guidance for topics such as the historic environment, natural environment and flooding, key agencies such as Historic Environment Scotland and the Scottish Environment Protection Agency provide more detailed guidance. This would ensure consistency and support an efficient Planning Authority function.</i></p>	<p><b>Agree.</b> Signposts within the NPF to other relevant, detailed guidance, from various national bodies should be clear within any document. Any such guidance should have been subject to consultation.</p>
<p><b>7.</b> <i>The presumption in favour of sustainable development should remain at the forefront of the plan making process. Policy wording should ensure sufficient weight is given in the Development Management process.</i></p>	<p><b>Agree</b>, subject to stricter interpretation on what is 'sustainable development'. As an example, the Policy Information Note on Sustainability -</p> <p><a href="https://www.transformingplanning.scot/media/1209/place-sustainability.pdf">https://www.transformingplanning.scot/media/1209/place-sustainability.pdf</a></p> <p>highlights the following issues:</p> <ul style="list-style-type: none"> <li>- Does 'sustainability' remain an appropriate catch-all outcome for increasingly significant policy drivers such as climate change, inclusive growth and human wellbeing?</li> <li>- Should NPF be more strongly/clearly allied to the United Nations Sustainable Development Goals and, if so, are there particular goals which should be given particular attention through spatial or thematic policies?</li> </ul>

	<p>It is essential that NPF places an emphasis on this criteria being in line with the Vision and Spatial Strategy of LDPs. It is also vitally important that LPAs are also able to expand upon national policy in this respect, in order to develop a tailored local policy approach to placemaking.</p>
<p><b>8.</b> <i>Placemaking should be at the forefront of development. NPF should be more prescriptive to ensure that placemaking principles are carried through to Development Management. Pressure to meet housing targets should not compromise the ability to deliver high quality design and local context should be considered to ensure new developments respond appropriately to the surrounding area.</i></p>	<p><b>Agree.</b> However, we would recommend the following modifications (highlighted bold):</p> <p><i>NPF should be more prescriptive to ensure that placemaking principles <b>are implemented by designers and developers whatever the scale and nature of the development and</b> are carried through to Development Management. Pressures to meet housing targets <b>and/or offset excessive site acquisition/construction costs</b> should not compromise the ability to deliver high quality design and local context should be considered to ensure new developments respond appropriately to the surrounding area.</i></p> <p>It is also vitally important that LPAs are allowed to expand upon National Policy in respect of placemaking, in order to tailor local policy in response to the character and circumstances of individual places.</p> <p>With regard to housing targets, we strongly agree that any potential harmful impacts on communities, landscape and infrastructure should not be set aside simply to meet housing targets.</p>

<p><b>9.</b> <i>A significant issue for the delivery of new housing was noted as the absence of a robust methodology which could be consistently applied to calculate housing land requirements. NPF should provide a robust methodology and measures to evaluate site effectiveness.</i></p>	<p><b>Agree.</b> This appears to be a consistent source of considerable debate and conflict in the preparation of previous LDPs. However, it is important that any process also involves the LPA being able to sense check numbers, and implications of that. Otherwise, this runs the risk of undermining stated placemaking aims and aspirations for policy direction elsewhere. Furthermore, whilst NPF4 should continue to place emphasis on deliverability it should not then focus solely on easily developable greenfield sites and/or areas of high market demand. Regeneration of lower market demand areas and vacant/derelict sites are still necessary.</p>
<p><b>10.</b> <i>Planning authorities should be required to critically review the effectiveness of housing and business land when preparing LDPs to ensure LDPs support effective sites.</i></p>	<p><b>Agree.</b> Whilst this is true for all sites, this is especially true for sites that come forward with multiple owners/developers. Evidence of a consortium approach to ensure effective delivery post LDP allocation key.</p> <p>This is further discussed in recent Scottish Government Report Deliverability of Site Allocations in LDP's (February 2020).</p>
<p><b>11.</b> <i>Development should deliver an infrastructure first approach which encourages longer term strategic planning and subsequently addresses future transportation, health, education and community facility requirements.</i></p>	<p><b>Agree,</b> although this takes more than just 'Planning' to achieve. NPF4 has a role in setting out expectations and responsibilities of the various bodies involved, in terms of a 'who', 'what', 'when' approach. It also reinforces potential important of LDP Action Programmes as a tool to monitor and manage progress.</p>
<p><b>12.</b> <i>More coherent guidance should be provided regarding SPP Subject Policy on 'Delivering Heat and Electricity' to ensure</i></p>	<p><b>Agree,</b> although these are very detailed areas of work, effectively a centrally planned renewable energy system is being</p>

<p><i>the delivery of renewable energy to meet low carbon ambitions. The Spatial Framework should provide more certainty on the circumstances in which windfarm sites are considered acceptable. The policy should be further detailed to ensure other renewable electricity generating technologies and storage are appropriately addressed</i></p>	<p>advocated, so what form would it take, an addendum or supplementary guidance?</p>
<p><b>13.</b> <i>Improvements to digital infrastructure and connectivity should be supported through NPF to reflect the significant economic and social benefits that connectivity will bring to businesses, residents and visitors. Policy should allow flexibility to support technological advances throughout the lifespan of the plan.</i></p>	<p><b>Agree</b>, although not aware of the planning system being a particular constraint in this regard. Flexibility is key however, given the likely continued pace of technological advancement.</p>
<p><b>14.</b> <i>Opportunities for community growing spaces and allotment provision should be further encouraged within NPF.</i></p>	<p><b>Agree.</b> Links to wider placemaking, green infrastructure and health &amp; wellbeing policy aims and objectives should be explicit.</p> <p>Also, should these be identified in LDP allocations? Perhaps through Local Place Plans also?</p>

## Part 4: National Developments Submissions.

Planning for Scotland in 2050  
National Planning Framework 4



Scottish Government  
Riaghaltas na h-Alba  
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## National Developments – Response Form

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

Name of proposed national development	National Aquaculture Technology and Innovation Hub
Brief description of proposed national development	<p>The National Aquaculture Technology and Innovation Hub will create the UK's leading innovation community for sustainable aquatic food production. It will lead the development and deployment of the new technologies and systems required to support growth in the production of aquatic food for human consumption, while reducing the impact on natural resources. This is a vital, timely initiative if the UK's leading position in global aquaculture is to be secured and enhanced.</p> <p>The University of Stirling intends to develop the National Aquaculture Technology and Innovation Hub and Scotland's International Environment Centre in a synergistic fashion, to realise maximum added value from the total investment. World leading technology solutions will be developed by placing sustainable, inclusive business development and support at the heart of both of these ambitious projects. By creating specialised and collaborative business communities within the heart of the region we will grow our economy and strengthen our regional supply chains.</p>
Location of proposed national development (information in a GIS format is welcome if available)	University of Stirling Campus.
What part or parts of the development requires planning permission or other consent?	The entire development will require planning permission.

When would the development be complete or operational?	By the end of 2030.
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	The project is identified through the Stirling and Clackmannanshire City Deal.
<p>Contribution of proposed national development to the national development criteria (maximum 500 words):</p> <p>Climate Change / People / Inclusive Growth / Place -</p> <p>The aquaculture hub is designed to work in synergistic fashion with the Scottish Environment Centre and will provide a suite of analytical laboratories and incubation and accelerator space to support inclusive growth and impact positively on the environment. The centre will lead development of aquatic food for human consumption to reduce impact on other natural resources to combat the climate change goals of reducing carbon emissions by 2045.</p>	



## National Developments – Response Form

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Name of proposed national development	Scotland's National Environment Centre
Brief description of proposed national development	<p>There is an urgent and critical requirement to transform the relationship between environmental management and business in order that the protection and enhancement of natural resources becomes a driver of clean, inclusive growth. This can only be achieved</p> <p>through:</p> <ul style="list-style-type: none"> <li>• Adopting new collaborative approaches</li> <li>• Co-producing novel strategies and business models</li> <li>• Identifying and delivering solutions through innovation and enterprise</li> </ul> <p>The University of Stirling intends to develop the National Aquaculture Technology and Innovation Hub and Scotland's International Environment Centre in a synergistic fashion, to realise maximum added value from the total investment. World leading technology solutions will be developed by placing sustainable, inclusive business development and support at the heart of both of these ambitious projects. By creating specialised and collaborative business communities within the heart of the region we will grow our economy and strengthen our regional supply chains.</p>
Location of proposed national development (information in a GIS format is welcome if available)	University of Stirling

<p>What part or parts of the development requires planning permission or other consent?</p>	<p>The entire development will require planning permission.</p>
<p>When would the development be complete or operational?</p>	<p>By the end of 2030.</p>
<p>Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.</p>	<p>The project is identified through the Stirling and Clackmannanshire City Deal.</p>
<p>Contribution of proposed national development to the national development criteria (maximum 500 words):</p> <p>Climate Change / People / Inclusive Growth / Place –</p> <p>A Regional Energy Masterplan (REM) that will support activity to tackle the climate emergency while meeting the energy needs of our local communities and businesses in both Council areas, this will assist in tacking poverty in the region by reducing energy costs. The Environment Centre will transform the relationship between environmental management and business in order that the protection and enhancement of natural resources becomes a driver clean, inclusive growth. Place is intrinsically at the heart of this as the development will assist in protecting and enhancing the quality of our places.</p>	



## National Developments – Response Form

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Name of proposed national development	National Tartan Centre
Brief description of proposed national development	The UK Government will provide up to £10 million to support capital funding of a Stirling based National Tartan Centre. This international-class facility will reinforce the City of Stirling's position as a go-to cultural destination and as a centre of excellence for traditional crafts and skills right in the heart of Scotland that is financially self-sustaining.
Location of proposed national development (information in a GIS format is welcome if available)	Forthside, Stirling
What part or parts of the development requires planning permission or other consent?	The entire development will require planning permission.
When would the development be complete or operational?	It is expected to be complete and operating by prior to 2030.
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	The project is identified through the Stirling and Clackmannanshire City Deal.

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

People/Inclusive Growth/Place

The National Tartan Centre will be sited in an attractive new building adjacent to Stirling's main public transport hub in the Forthside area of the city and connecting directly with the River Forth which itself played an important role in our region's history. This area is expected to undergo a major transformation with the development of the Forthside Masterplan which includes the nearby former Ministry of Defence site. The Site of the Tartan Centre is a key location within this masterplan and critical to strengthen the identity of the area as an extension of the City Centre and an area for tourists. The Centre will be located adjacent to The Engine Shed run by Historic Environment Scotland which is the centre of the traditional skills programme. The Tartan centre is well placed to sit alongside this and enhance the quality of the area for current and future residents.

As well as providing a high quality visitor attraction, which adds significantly to Scotland's culture and tourism offer, the centre will showcase the power and iconic nature of the tartan brand, drive a wide ranging programme of education and interpretation including skills, demonstrations and opportunities for participation and interaction, that will focus on Traditional crafts, manufacturing, fashion and design. The Centre's range of activities will enable the delivery of skills, inclusion and employability programmes within the fields of culture, heritage, tourism and traditional crafts for local people. This will support inclusive growth by enhancing the areas attractiveness for tourists but will also support the traditional crafts economy.

End.