

East Dunbartonshire Council NPF4 Early Engagement Response

The following sets out East Dunbartonshire Council's response to the NPF4 Early Engagement questions. It should be read as a whole given the cross over between the questions, the responses below do not duplicate each other across the questions. The Council will respond to the Draft NPF4 when it is published (currently expected in 2021) and reserves its right to update its position once the content of NPF4 is fully understood.

1. What development will we need to address climate change?

The urgency of addressing climate change presents a huge opportunity to dramatically improve the environmental, social and economic wellbeing of our local communities. Whilst it is encouraging that the commitment to tackling climate change is well established within Scotland's planning system, significantly more needs to be done to properly prepare for the effects of climate change and build resilience within our communities. We completely agree with Aedan Smith's view in his thought piece in *Transforming Planning* that NPF 4 is, in effect, the 'emergency plan for the built environment'.

The Council strongly supports the commitment in the Programme for Government that "the fourth National Planning Framework will help to radically accelerate reduction of emissions" and that "the time is right for wide-ranging debate on more radical planning policy options". For this to be achieved effectively, the way in which we plan our communities needs to be fundamentally re-assessed. The carbon footprint of all new development, both in terms of its construction and future use, should be assessed as part of both the planning policy and development management stages.

The Scottish Government has set a target of net-zero emissions by 2045. Transport is currently Scotland's largest sectoral emitter, responsible for 37% of Scotland's total greenhouse gases in 2017. It is therefore crucial that development and infrastructure is planned in Scotland to reduce transport's contribution to climate change. NPF4 must ensure that new development enables the delivery of associated sustainable transport infrastructure that makes easy and safe journeys to be made in line with the Sustainable Travel Hierarchy.

It has already been stated that NPF4 will be aligned with the Scottish Government's Strategic Transport Projects Review 2. The Council welcomes this alignment and encourage the Scottish Government to ensure that both NPF4 and STPR2 deliver – and prioritise a commitment in investment – to sustainable transport interventions that will attract more people to travel by walking, cycling and public transport which will in turn deliver on the Priorities as set out in the National Transport Strategy 2.

A large proportion of new residential, retail and business development, in both urban and rural locations, is designed and located in a way that strongly favours car travel over the use of public transport and active travel. Increasingly, new development militates against low carbon travel and actively contributes to transport's carbon footprint.

Planning cannot contribute to a radical acceleration in the reduction of emissions without addressing how the location, density and design of new development can better encourage active travel, and how such development is linked to public transport and high quality active travel routes. If new development is to meet the challenge of radically accelerating reduction

in emissions, it will have to be radically re-thought with much closer integration between transport and land use planning and a step-change in design to ensure that convenient and accessible sustainable transport becomes the default means of travelling, rather than the private car.

A shift away from private vehicular travel is essential to contribute to a reduction in greenhouse gas emissions but also to help improve local air quality. National Transport Strategy 2 recognises that transport is a major contributor to harmful pollutants which negatively affects local air quality. It is important to improve local air quality for well documented reasons but it is especially important for reducing inequalities as poor air quality can disproportionately affect younger people, older people and those with heart and respiratory health issues. The planning system therefore should contribute to this by ensuring all modes of travel over the private vehicle are prioritised in new development.

While it is recognised and understood that electric vehicles can contribute to a reduction in emissions, a straight switch from current levels of petrol and diesel vehicle use to electric vehicle use will not reduce issues such as congestion and physical inactivity and therefore will not improve the design of places or make them more people and wellbeing focused as opposed to focused on the private car. Harmful particulate matter from brakes and tyres on an electric vehicle will also continue to be an issue. It is therefore important that the planning system recognises that electric vehicles are only part of the solution but the priority should be on a modal shift to active travel and public transport if the desired emissions and air quality improvements are to be realised.

In terms of climate change mitigation, the following principles should be addressed in NPF 4:

- Introducing a requirement for developers to demonstrate that their proposals maximise heat and energy efficiency, by placing greatest emphasis on energy reduction, following the ‘fabric first’ principle; incorporation of renewable energy, including renewable heat, as a means of reducing the carbon footprint of new development; and only then using conventional energy for remaining requirements. National policy should set out a requirement for statements on the energy use and sustainability of new development and define the necessary standards for these. It is also important that greater clarity is provided through NPF4 on the role of the planning system in reducing carbon emissions from new development, in support of the forthcoming strengthening of Building Standards.
- How the layout, density and mix of development can support identified opportunities for decentralised energy; identify opportunities for decentralised energy at a city region level.
- Avoiding the creation of demand for bio-energy fuels known to result in a net increase in carbon dioxide emissions through production methods, transport requirements, and/or loss of carbon sinks in particular deep peat and carbon rich soils. These areas should be identified at a city regional scale for protection from forestry and development, due to their importance for climate change mitigation as well as other benefits, to complement Scotland’s National Peatland Plan.

- How the planning system can support investment in district heat networks and electric vehicle infrastructure. This will require a better understanding of viability issues, potential opportunity areas including on a city region basis, including enhanced data and mapping to support the development management process.
- Sustainable waste management infrastructure including space for recycling and composting and providing opportunities for circular economy companies on business sites.
- Provision of spatial frameworks for wind energy, other renewable energy sources and indicative areas for woodland planting and restocking at a city regional level.

In terms of climate change adaptation, more needs to be done to safeguard our communities from a rapidly changing climate. Planning policy needs to be much better integrated with the Scottish Government's Climate Change Adaptation Programme, *Climate Ready Scotland*, with a stronger emphasis on planning supporting the key outcomes of the Programme. This includes the safety and resilience of our communities and ensuring our critical support systems, such as energy, water, communications and transport infrastructure, are protected from the accelerating effects of climate change including flood and heat events. It is essential that we continue to implement and strengthen the physical dimension of the placemaking agenda, to support the National Outcome that 'we live in communities that are inclusive, empowered, resilient and safe'. In terms of what the planning system should demand of new development, the forthcoming NPPF4 must incorporate current best practice and take a leading role in responding to the Climate Emergency by:

- Maximising the opportunities of new development to enhance resilience by, for example, reducing the causes of flooding. At a regional level this could include identifying the land use implications of the Glasgow and Clyde Valley Flood Risk Management Strategy, including potentially vulnerable areas where new development should be avoided and priorities for natural flood alleviation.
- Including a drainage hierarchy to be applied to all new development to reduce the rate and volume of surface run-off. Rainwater should be managed on-site in all new development such that run-off rates from new development should not exceed those of greenfield sites, and incorporation of green infrastructure to help achieve this should be prioritised over installation of grey infrastructure. Where run-off does exceed greenfield levels, policy should be strengthened to require developers to directly contribute to off-site flood alleviation projects, natural flood management initiatives and river restoration where this will reduce flood risk locally. NPF 4 should introduce a requirement for surface-water runoff management plans for all new development which clearly demonstrate that greenfield run-off rates will be achieved (e.g. as per the new London Plan), through the adoption of approaches such as rainwater harvesting, green roofs and on-site attenuation. Installation of impermeable paving should be brought fully under planning control with powers to refuse permission where this could contribute to flood risk.
- NPF 4 should strengthen policy on the siting and design of new development to reduce flood risk and maximise resilience. This could be achieved by introducing a requirement for developers to meet set standards for layout and design including: use

of landform; layout; building orientation; tree planting; massing and landscaping to meet a high standard of climate resilience, including reducing run-off, maximising resilience to increased temperatures; and improving the microclimate in development. This approach should also focus on how new development will minimise energy consumption, thus also contributing to climate change mitigation.

In light of mounting evidence about global warming, sea level rises and the risk of flooding, it is also important that the relationship between new development, flood defence and resilience is strengthened. For example, recent scientific projections to 2050 anticipate devastating consequences for urban areas within the River Clyde catchment area if action is not taken now. This includes coastal flooding, damaged infrastructure and displacement of communities. It is therefore imperative that action of flood resilience is taken now and that all areas of Scotland prepare for potential increases in flooding as a result of development and climate change. This will likely require a much bolder and more sophisticated approach than at present. To help achieve this, it is essential that future decisions are based on the high quality and accurate data and evidence.

NPF4 needs to be enabling of the advances in technology, new economic sectors, and new links between existing sectors which may arise from the transition to a zero carbon society. As part of the concerted effort to tackle emissions, it is essential that Scotland continues to work towards creating a circular economy. Reducing waste will require changes to working practices across all industries, and businesses will require support during this transition. Climate change will be a challenge to traditional ways of working – both in terms of its direct impacts and the actions which must be taken to mitigate it, but it could also be a business opportunity. With its renewable energy sector already identified as a key growth industry by the Scottish Government, Scotland could be at the forefront of technological innovations – for example, turning waste materials into fuel, or designing new re-useable materials. Similarly, some of the other Scottish Growth Sectors are well-placed to create more jobs in a zero emission economy:

- Scottish tourism may benefit from warmer weather, reduced travel and potential increases in the popularity of ‘staycations’, and there may also be expansion of the eco-tourism market.
- Engineering, architecture and design industries have an opportunity to innovate and produce energy efficient buildings. Adaptation to severe weather events such as flooding may also create a niche for developing expertise in water management and drainage.
- The life sciences and food and drink industries could focus on producing climate-resilient crops and sustainable packaging.
- The financial sector may benefit from new insurance products and services to spread the risk of climate change.

Adaptation Scotland have identified other more general economic opportunities which may arise from the impacts of climate change on lifestyles and business practices. For example, with many business activities being conducted online, more people may opt to avoid commuting and work remotely. This would reduce emissions and also help employees to remain productive while avoiding the risks of travelling during extreme weather events. Climate change resilience is likely to become a selling-point for businesses, increasing the

confidence of customers by reducing future risks and liabilities. ‘Early movers’ who respond quickly to changes in markets and lifestyles will have the advantage over competitors, and this may help to drive innovation and entrepreneurship. There will also be a competitive advantage for companies which have undertaken continuity planning or have flexible and diverse supply chains.

NPF4 Key Objectives (SPP Policy Themes)

Scottish Planning Policy (SPP) Topic	Proposed key objectives of NPF4:	Council Response
Air Quality	To ensure that the planning system helps tackle poor air quality and promote good air quality through the promotion of sustainable placemaking and transport links and ensuring that new developments are guided towards appropriate locations.	Support in line with comments above.
Climate Change	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.	Support in line with comments above.
Energy – Electricity	To maximise the contribution of renewable electricity generation to meeting our net zero target in a sustainable way.	Support in line with comments above.
Energy – Heat	To maximise the contribution of renewable heat generation and systems to deliver renewable heat (such as district heating, electrical network upgrades) and reduce the cost of delivering this transition (such as supporting heat and electrical storage systems) to meeting our net zero targets in a sustainable way.	Support in line with comments above.
Flooding	To reduce the vulnerability of existing and future development to flooding.	Support in line with comments above.
Green Infrastructure	To protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking.	Support in line with comments above.
Preserving Peatland	To have regard to the desirability of preserving peatland so that climate change benefits of reducing emissions and other benefits including to air and water quality, biodiversity and habitat creation and flood alleviation are realised.	Support in line with comments above.
Transport	To ensure that new development supports delivery of the vision and priorities set out in the National Transport Strategy.	Support in line with comments above.
Sustainability	To ensure that the planning system supports the Scottish Government’s purpose of focussing on creating a more successful country with	Support in line with comments above.

	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.	
Waste	To support the management of waste in line with the waste hierarchy (waste prevention; reuse; recycling; energy recovery and waste disposal) and to guide development for new infrastructure to appropriate locations.	Support in line with comments above.

National Developments

Current	Proposed	Council Response
Central Scotland Green Network – Creating a step-change in environmental quality, addressing areas of disadvantage and attracting investment.	Retain, no change.	<p>The Central Scotland Green Network should remain a national development, as it promotes the delivery of a number of policy areas. A core principle of the Green Network is the recognition that improving the environmental quality of an area will support the economic competitiveness, and the health and wellbeing of the population.</p> <p>The role of the Glasgow and Clyde Valley Green Network as a regional component of the Central Scotland Green Network (CSGN) should continue to be recognised as a National Development in the National Planning Framework.</p> <p>The proposal to include a CSGN ‘Blueprint’ is welcomed and will allow the expansion and development of the emerging Glasgow and Clyde Valley Green Network Blueprint.</p>
National Long Distance Cycling and Walking Network – Closing gaps in the current networks to enhance visitor experiences and provide better access to the outdoors for people.	Retain, however update and enhance to increase benefits.	The national long distance cycling and walking network should be retained as a national development, with links to green network and active travel network promoted. It should also be modified to pivot the focus to daily journeys so that this national development can have a significant impact on modal shift, tackling climate change, public health and improving places, as well as delivering visitor experiences.

		<p>This national development should be linked to STPR2 to ensure adequate funding for a nation-wide network. Focus should start in cities and higher population areas and should allow much faster implementation of identified routes and ongoing work to identify routes through Local Transport Strategies and Active Travel Strategies.</p>
	<p>Clyde Mission – Project area to encompass Clyde River basin and tributaries, project scope to include redevelopment of Clyde waterfront, climate change adaptation and mitigation, impact on tributaries and appropriate development.</p>	<p>Clyde Mission should be included as a new national development reflecting the need to consider climate change impacts across the river basin and tackle significant vacant and derelict land along the Clyde.</p>

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

Investment in the green network and a stronger commitment to enhancing green infrastructure in urban areas will be essential in supporting a better quality of life, good health and wellbeing. In effect, the provision of green infrastructure needs to be placed at the heart of future development, given its fundamental importance as a multifunctional resource including: biodiversity, climate change mitigation and adaptation, including flood management, human health and wellbeing, play, recreation and active travel, landscape setting of development and water quality.

This will require a step change in the way new development is delivered so that it is given at least equal status to other important national priorities and greater emphasis than grey infrastructure in the management of drainage from new development. Such a change in culture must be incorporated into all aspects of the planning system, particularly the development plan preparation and examination process. At a site level, new development must provide public or private open space and links to green network, recognising the opportunities for people, biodiversity, flood storage and carbon management provided by multi-functional green spaces and green infrastructure networks. Priority must also be given to the use of sustainable drainage systems, including the potential for waste water recycling.

The Programme for Government recognises that ‘our natural environment is central to our response to the global climate emergency, to a successful, sustainable economy and our national identity’, and that ‘biodiversity loss and the climate crisis are intimately bound together: nature plays a key role in defining and regulating our climate and climate is key in shaping the state of nature’. As recognised in the Programme, nature-based solutions are critical to addressing the climate change challenge and the various initiatives being pursued by the Scottish Government on this, including the Biodiversity Challenge Fund and the Green Infrastructure Strategic Intervention Programme are welcomed. However, it is also vital that new development positively contributes to reversing biodiversity decline and supporting nature-based solutions to climate change.

We are therefore disappointed that the Scottish Government has not yet developed proposals for biodiversity net gain and nature recovery strategies which match the level of ambition in the Environment Bill in England and Wales. The concept of biodiversity net gain, which will shortly become mandatory in England and Wales, offers the opportunity for new developments to enhance biodiversity and create new green spaces for local communities to enjoy. We would strongly recommend that a requirement for biodiversity net gain is incorporated into NPF 4 to ensure that Scottish biodiversity benefits from the prevention of net biodiversity loss as a result of new development, which would further fragment our existing habitat networks and could accelerate biodiversity decline. Biodiversity net gain has the potential to avoid this loss and create significant new areas of habitat for wildlife. It is estimated that in England this could represent annual natural capital benefits of around £1.4 billion. Biodiversity net gain has the potential not only to deliver these benefits, but also concomitant benefits for air and water quality, recreation, play and physical activity and flood management. It is essential that NPF 4 contains clear and enforceable policy on biodiversity net gain, including the need for developers to submit biodiversity gain plans, as a key driver towards achieving the Scottish Government’s ambitious carbon reduction targets, supporting

adaptation and reversing biodiversity decline, and addressing the need for nature-based solutions to climate change.

The Glasgow City Region's compact city region land use model directs development to sustainable brownfield locations. This maximises the use of existing infrastructure and assets, integrates land use with sustainable transport network, recycles previously developed land and is based on minimal extension of the city region's built up area, preventing urban sprawl reliant on the private car. As well as offering opportunities to renew the urban fabric to carbon neutral standards, the model aims to improve the quality of life for people and reducing inequalities through the creation of a place that maximises its economic, social and environmental assets ensuring it fulfils its potential as Scotland's foremost city region. Fundamental to the success of this strategy is the continued recognition of the importance of regional spatial planning. It is at this scale that questions such as how many homes and where they might be located is most appropriately considered.

It is recognised that in order to meet the need and demand for new housing and reflecting the infrastructure capacity constraints of many existing settlements that consideration should be given to new settlements. This should again prioritise the use of brownfield land first for example through the required investment in regional priorities such as at Ravenscraig, the Clyde Gateway, Clydebank and Glasgow North before the consideration of green field settlements near cities. In particular development in Clydebank and Glasgow North will reduce pressure for greenfield development in the Strathkelvin and Greater Glasgow North East and Greater Glasgow North and West housing sub market areas.

The role of the Glasgow and Clyde Valley Green Network as a regional component of the Central Scotland Green Network (CSGN) should continue to be recognised as a National Development in the National Planning Framework. A core principle of the Green Network is the recognition that improving the environmental quality of an area will support the economic competitiveness, and the health and wellbeing of the population.

In considering questions in relation to both numbers and locations of new housing, questions of local democracy should be paramount. Local Place Plans, Local Development Plans and Regional Spatial Strategies all have a role to play and NPF4 should allow scope for regional and local priorities to be considered. The number of new homes that can be delivered should not be to the detriment nor prioritised over principles of sustainability.

Calculating Housing Need And Demand – Whilst it seems impossible to move away from housing targets these must be driven by the needs of communities and be for the purpose of creating high quality and well-functioning places. The Council agrees with the proposed objective in the general housing background report '*To ensure that development plans allocate the right land in the right place at the right time and to facilitate and monitor the delivery of this land.*' The focus on the 'right land in the right place at the right time' is particularly welcomed by the Council. However, the Planning (Scotland) Act 2019 introduces a requirement for the National Planning Framework to include housing supply targets and there is a danger that nationally set targets and the pursuit to deliver them will not lead to the development of housing on the right land in the right places at the right unless the way in which places work is fully considered in the process of setting targets.

Any housing land supply targets that are set within NPF4 should take the following into account:

- a) regional and local demands and trends,
- b) infrastructure issues and requirements,
- c) the management of greenbelts and the relationship with brownfield land regeneration, including cross-boundary efforts,
- d) be based upon robust evidence and coproduction with stakeholders; and
- e) Local Place Plans process and community aspirations.

Given, the stated timescales for producing NPF4 and the time taken to produce Housing Needs and Demands Assessments (HNDA's), NPF4 must therefore make clear relationship of the national targets to the continuing role of Housing Needs and Demands Assessments and Local Housing Strategies, which are not affected by the changes in the Planning (Scotland) Act 2019.

The housing background report identifies that there are many differing methodologies for calculating the 5 year effective housing supply target and inconsistency in how the current SPP requirement is applied. The Council would agree that there are currently many different ways in which the SPP requirements can be interpreted and that officer time and resources is regularly spent on working through various scenarios. We would therefore appreciate further clarity on the process for calculating the targets and measuring the supply to streamline the work that has to be undertaken. This should cover matters such as: the period of target to be used and whether or not this is annualised or the complete period, the purpose of the housing land requirement and its relevance to the preparation of Local Development Plans only (and not in the assessment of planning applications) and the approach to taking into account (or not) housing completions and demolitions. The Council also supports decoupling the availability of land for housing development (the Council's responsibility) from measuring the delivery of new homes and pace of development (the development industry's responsibility, including affordable housebuilding).

The Council has always maintained that the application of generosity is unnecessary, particularly in an area such as East Dunbartonshire where demand for new housing, and subsequently interest from house builders, is high. Although a small number of consents or sites allocated for development in previous Local Plans have not delivered housing on the ground, these instances are very small in number, and in size, and the number of units lost from the supply is outweighed by the number of additions to the supply through windfall developments. The margin of generosity of 10% to 20% also appears to be arbitrary. The Council would be pleased if the approach to generosity is reconsidered in NPF4.

During the preparation of Scottish Planning Policy 2014 the Council disagreed with applying the presumption in favour of sustainable development from Paragraphs 32 – 35 when a Local Authority is judged not to be maintaining a 5 year effective housing land supply. Reverting back to the proposed NPF4 objective that development plans should allocate the 'right land in the right place at the right time' this can only be achieved through a coordinated process where the main issues relating to housing need, sustainable locations for development and impacts upon infrastructure and existing communities are assessed together in a strategic manner i.e. through a process such as the Local Development Plan process. Moreover, the proposed objective explicitly states that it is the job of the development plan to allocate land

for housing and therefore a provision which potentially allows the allocation of new land for housing on an uncoordinated basis, through planning applications and appeals, does not seem to fit well within this.

These arguments aside, given that Local Development Plan preparation will go from a 5-year cycle to a 10 year cycle, but with the ability to update the plan mid-term should this be required, this should allow authorities time and resources to respond to a potential shortfall in the supply through producing an update to the plan. This for example could be in cases where new housing targets emerge as a result of the publication of a future National Planning Framework or where a new Housing Needs and Demands Assessment has been produced as part of preparing a Regional Spatial Strategy. Additionally, under the new system the Gatecheck process will ensure that the housing land target will be tested quickly and responsively.

The Council would also raise that what constitutes sustainable development is open to interpretation and that different Council's and Reporters can and do take different approaches. This can also be said for the preparation and examination of development plans; but to a lesser extent given that all of the potential sites are being assessed at the same time in a consistent manner and that the potential for variation is reduced.

As such the Council considers that it would therefore be inappropriate to continue applying the current presumption in favour of sustainable development with reference to housing land supply.

Diversifying the range and types of housing built - In recent years the Scottish Government has been very successful in promoting alternative models of housing, such as co-housing, self-build and build to rent, through encouraging words, training, sharing best practice and in some cases modest project funding. However, without a robust policy framework in place, negotiations on the ground and at the development management stage are unlikely to yield much innovation or real change in the new housing that is delivered.

NPF4 presents an opportunity to start the process of overhauling the housing system in line with the ambitious vision and principles of 'Housing to 2040'. The Council would welcome clear and effective policy in NPF4 that leads to the delivery of a greater range and type of new housing that is tailored to meet the needs of future residents. However, it is important that any policy interventions in NPF4 seeking improved technical standards would be best achieved through the Building Standards process. Please also see the Council's comments below regarding older peoples and specialist housing.

Affordable Housing – The Council does not agree with the proposed key objective in the affordable housing background report *'To maintain the existing policy support for affordable housing provision. There is a lack of evidence that the policy is failing to deliver affordable homes, taking into account accelerated delivery in recent years and the success of the More Homes approach.'* on the basis that SPP should be clearer in the support for affordable housing through a percentage contribution approach.

The publication of Scottish Planning Policy (SPP) in 2014 included a subtle but significant shift in language stating in Paragraph 129 that *'The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number*

of houses. This change has led to the development industry challenging the need to provide the full 25% affordable housing because the phrase 'generally be no more than' gives the perception that this is a maximum standard and that arguments can be made to reduce the percentage that is required. However, given that SPP is clear that developer contributions should only be sought where there is demand (backed up by evidence) a lower percentage of affordable housing is unlikely to help meet the demand for affordable housing in that area.

The Council would prefer wording that sets a benchmark for affordable housing at 25% and explicitly stating that Local Development Plans can adjust this depending on local circumstances (supported by evidence that is appropriate and proportionate). The wording will be particularly crucial given that the NPF4 will become part of the development plan and a continuation of the current SPP wording would be open to interpretation. Therefore, leading to increased debate and challenge at planning application stage regarding the level of affordable housing contribution to be applied.

Older Peoples and Specialist Housing – The Council agrees with the draft NPF4 objective in the specialist housing background report *'To improve the policy so that the housing needs of older and disabled people are better accounted for in the planning system.'*

The Council has commissioned research into older peoples and specialist housing. It is a joint project between the Council's Planning and Housing Team's and the Health and Social Care Partnership. Whilst the study has not yet been finalised it is clear that most people's first preference is to remain within their existing property and that the vast majority of people over 55 are not looking to move property. Many of the people interviewed recognised that their housing needs could change in the future but have not given it much thought, and a significant proportion of people have not given it any thought at all. Of those people who have thought about it a small number have already taken action to ensure their housing needs will be met, whereas others have at least considered some of the options that could be available to them. Of the respondents who stated that they did want to move home, it was often urgent and in some cases forward planning may have prevented the resident reaching a point of housing crisis.

All of the respondents were asked which housing solutions they would consider in the future in the event that they were to move home. With regards to the physical type of property, most respondents stated that their first preference would be to move to a bungalow and the vast majority sought one or two bedrooms. With regards to tenure, a greater proportion of respondents said that they would consider sheltered housing/ social rented housing than private retirement complexes. Which is perhaps surprising given the dominance of owner occupation in an affluent area such as East Dunbartonshire. In terms of where people would like to live it was clear that housing for older people must be in accessible locations and that proximity to healthcare facilities and shops were considered most important.

Therefore, whilst the Council supports the objective to ensure that the needs of older and disabled people are better accounted for in the planning system there is no silver bullet and the policy in NPF4 will need to have cognisance of the complexities and nuances of the issue.

Scottish Planning Policy currently requires local authorities to 'consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and

supported accommodation, including care homes and sheltered housing' and where a need is identified 'planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific site.'

In many ways the agenda has shifted beyond just simply providing housing for older people and those in wheelchairs to a wider response to changing demographics and what this means for the future of places. NPF4 should consider ways to:

- a) proactively respond to the aging population, not just focussing on people's needs now but how they plan and prepare for older age,
- b) ensure flexibility and adaptability in all types of new-build housing, reflecting that many people as they get older, or as their mobility needs change, want to remain in the house they already live in, possibly by making the Housing for Varying Needs Standards mandatory,
- c) investigate the role that technology can play in enabling independent living by providing support in the home, and to what extent this may or may not be relevant to planning's role in meeting housing need,
- d) encourage the development of varying types of specialist housing, and smaller properties that would appeal to older people even if not marketed or restricted as such, for those older people who do wish to move home; and
- e) prioritise the importance of location and access to local services (such as healthcare facilities but also shops), and to avoid larger-scale older peoples housing developments designed to function as self-contained communities and/ or with poor access to public transport.

Given the complexities noted above, NPF4 will need to be careful if setting targets, or requiring local authorities to set targets, for older people housing as the differing needs of older households will be difficult to measure and meeting any need identified will require a number of different solutions. Additionally, the risky nature of developing private housing for older people must be recognised, as evidenced by the decision of McCarthy Stone to withdraw from developing new projects in Scotland.

As discussed above, only a minority of households surveyed as part of the Council's study stated that they would like to move to a new house either now or in the future and that the vast majority wish to remain where they are. The Council does support the delivery of new specialist housing given:

- a) the benefits to people living in older peoples and specialist housing, such as opportunities for social interaction, the ability to increase and decrease levels of support as required, and help with maintenance; and
- b) with the proportion of older people in Scotland expected to continue to rise, sustaining the current percentage of people living in older peoples housing would in itself require an increase in supply of such housing.

However, in addressing the needs of the aging population, it is important to remember that people's housing needs, preferences and financial considerations will change through time and that the drive to meet the needs of the aging population must not be overly reactive and potentially create issues for other demographic groups. For example, younger people and those who live alone also face significant challenges in accessing the housing they need,

particularly in an area such as East Dunbartonshire where developers tend to deliver larger and more profitable homes. Therefore, ensuring that more smaller and accessible homes are built (whilst also ensuring all new homes are adaptable), will help to address the housing needs of both the aging population and the other demographic groups mentioned.

As in previous comments above, the National Planning Framework and Local Development Plans will not be able to effectively influence what is built, particularly in the private sector, without robust policy that aids the development management process and that improvements to technical standards for new homes, such as requirements for wheelchair housing and adaptability, should be driven through improvements to the Building Standards regulations.

Gypsy/ Traveller Housing – The Council agrees with the proposed key objective in the Gypsy/ Traveller Accommodation background report *‘To ensure that the current and future accommodation needs of Gypsy/Travellers are met so that they are provided with access to good quality, safe and appropriately located sites.’*

The current wording in Scottish Planning Policy is clear that Local Authorities should undertake an assessment of demand for Gypsy/ Traveller accommodation and allocate land for such sites where sufficient demand has been demonstrated. However, as recognised in the background report it has become clear that since 2014 the recording of the Gypsy/ Traveller population has been inaccurate and that measurements appear to have underestimated the level of demand. Therefore, whilst the requirement may be clear, a lack of reporting of demand is a likely reason why there has been little delivery in providing new accommodation. The background report also identifies the challenges for private sites to get planning consent and that the majority of such applications are refused. Therefore, it is considered that these are the two main areas requiring further policy and direction to ensure that the proposed NPF4 objective is achieved.

Firstly, how can NPF4 support a process of establishing demand that is much better informed and robust? A point to consider is are Housing Needs and Demands Assessments (HNDA’s) the correct process to consider Gypsy/ Traveller need? The HNDA deals largely with quantitative data where the scale and nature of demand for private and affordable housing is very different to the needs of Gypsy/ Travellers. The nature of Gypsy/ Traveller demand means that more investigative, qualitative and empirical methods are required. The way in which Gypsy/ Traveller communities live, taking into account the diverse sets of travelling communities with differing identities, cultures, expectations and travelling patterns, is also an important consideration. This work may therefore be more appropriate at the national level with collaboration with regional and local stakeholders. The suggestion of mapping transit routes in the background report is positive and would be useful information for the preparation of Regional Spatial Strategies and Local Development Plans. This however would only help to ascertain demand for transit sites and the NPF should be more explicit in setting out the different types of Gypsy/ Traveller demand, and subsequently the different types of provision and solutions that will be required to meet that demand.

Secondly, how can NPF4 support planning applications to come forward and be determined positively, particularly private Gypsy/ Traveller sites? It is considered that it would be useful for NPF4 to include criteria to be addressed in the assessment of planning applications. There

is however already a number of sources of information setting out standards and guidance, such as the guides provided PAS and the policy work by COSLA that Local Authorities have been able to feed into the preparation of LDP policy, yet applications are still regularly being refused. Therefore, whilst the formalisation of criteria through NPF4 will be helpful in setting out clear requirements and perhaps more importantly that they will have status, awareness raising and ‘myth-busting’ will also be required to ensure that the proposed objective is achieved.

NPF4 must be clear that ‘encouraging people to live in rural areas’ relates to more remote rural areas where population decline or the fragility of the economy is an issue. Rural areas that are accessible from towns and cities require continued protection from unsustainable and ribbon development.

Addressing longstanding inequalities in health and quality of life – Town centres lie at the heart of our communities and have a huge impact on many people’s lives. However, they will continue to face huge challenges in the coming years, as outlined in the ‘Think Piece’ by Phil Prentice, *Town Centres of the Future*. Shared issues across all town centres will be the need to repurpose former retail space, accessibility, adapting to a low carbon economy and changing demographics. It is therefore critically important that the town centre first principle – which is an aspect of the current SPP that has worked well - is built upon and an appropriate planning framework is in place that support and encourage healthy, sustainable lifestyles.

NPF4 must also recognise the role town centres have in contributing to climate change mitigation and adaptation - it will be impossible for Scotland to achieve its net zero carbon by 2045 target without fundamental changes to the way our town centres are developed and managed. This can be achieved through investment in green infrastructure, enhanced active travel connections, public transport accessibility and sustainable, energy efficient design. Embedding these requirements into national policy will help to ensure that those people who are most dependent on town centres have improved access to them and can use them safely, without any adverse impacts on their health or wellbeing.

Town centres must be social and economic hubs that are welcoming to people of all ages and abilities. It is therefore important that the planning system encourages and incentivises design within town centres that can add value to people’s lives, particularly those with physical and mental disabilities. Similarly, planning authorities should be given greater planning powers to prevent the proliferation of uses that are likely to have negative long-term impacts on the health and wellbeing of local communities e.g. through the use of specific thresholds for certain types of uses. Local planning authorities should have scope to use these powers as appropriate to meet local circumstances, however it would be helpful if an overall policy approach was set out at the national level. The use of health checks is supported, but the methodologies and application of them seems fragmented across different authorities. It would be useful if more specific guidance or policy framework was set out at the national level, as this would lead to more consistency.

Access to greenspace in or near town/village centres is also an important factor in contributing to the health and wellbeing of local communities. Planning authorities must be supported in efforts to link surrounding neighbourhoods with the town centre, through a high quality green

network. The Council strongly believes that access to quality greenspace and green networks has enormous health benefits to local communities and potential to significantly reduce health inequalities.

In general there needs to be much greater alignment between the planning system and public health bodies, so that the potential of good planning and place making to influence public health can be fully realised. It is recommended that this reflected in the relevant proposed objective of NPF4.

NPF4 Key Objectives (SPP Policy Themes)

Scottish Planning Policy (SPP) Topic	Proposed key objectives of NPF4:	Council Response
Community Facilities	To promote and support the provision of accessible community facilities where a need has been identified in local development plans	Support.
Green Belts	To direct planned growth to the most appropriate, sustainable locations whilst protecting and enhancing the character, landscape setting and identity of settlements and providing access to countryside recreation.	Support in line with comments above.
Gypsy / Traveller Accommodation	To ensure that the current and future accommodation needs of Gypsy/Travellers are met so that they are provided with access to good quality, safe and appropriately located sites.	Support in line with comments above.
Housing – Affordable	To maintain the existing policy support for affordable housing provision. There is a lack of evidence that the policy is failing to deliver affordable homes, taking into account accelerated delivery in recent years and the success of the More Homes approach.	Do not support in line with response above.
Housing – General	To ensure that development plans allocate the right land in the right place at the right time and to facilitate and monitor the delivery of this land.	Support in line with comments above.
Housing – Specialist	To improve the policy so that the housing needs of older and disabled people are better accounted for in the planning system	Support in line with comments above.
Health	To ensure that planning policies and decisions take account of the health needs of local communities and have regard to the need to improve the diet,	Support in line with comments above.

	health and wellbeing of people living in Scotland.	
Promoting Town Centres	To ensure that planning policies recognise and address the challenges facing town centres so that they are better able to adapt and be vibrant, creative, enterprising and accessible places to live, work and visit.	Support in line with comments above.
Placemaking	To deliver sustainable, well-designed places and homes that meet the needs of people living in Scotland including, in particular, the housing needs for older people and disabled people. This will be done through a design-led approach which demonstrates the six qualities of successful places.	Support in line with comments above.

National Developments

Current	Proposed	Council Response
Central Scotland Green Network – Creating a step-change in environmental quality, addressing areas of disadvantage and attracting investment.	No change.	<p>The Central Scotland Green Network should remain a national development, as it promotes the delivery of a number of policy areas. A core principle of the Green Network is the recognition that improving the environmental quality of an area will support the economic competitiveness, and the health and wellbeing of the population.</p> <p>The role of the Glasgow and Clyde Valley Green Network as a regional component of the Central Scotland Green Network (CSGN) should continue to be recognised as a National Development in the National Planning Framework.</p> <p>The proposal to include a CSGN ‘Blueprint’ is welcomed and will allow the expansion and development of the emerging Glasgow and Clyde Valley Green Network Blueprint.</p>

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

The internet and e-commerce are likely to continue to be a key driver of economic activity in Scotland in 2050, particularly with the trend of increase in remote working. If daily travel is discouraged by climate change challenges and legislation, there may be a wider distribution of small businesses set up and working from business hubs and private homes across the country. This will be a challenge for planning, as it will be more difficult to measure and support business development in this more disparate geographic form. It will also be a challenge to determine requirements for business and industrial land, and to ensure that premises and infrastructure meet changing business needs. In particular, the businesses of the future are likely to require more central locations compared to the peripherally-located 'heavier' traditional industries of the past, which required greater separation from other uses. As such, the planning system will need to support and encourage mixed-use development, the creation of sustainable and flexible new business premises, and regeneration of any derelict business land which is no longer suited to modern industrial purposes.

Regardless of what the impacts of Brexit may be on Scotland's international trade relationships, planning must continue to facilitate indigenous economic growth by providing sites for business which are accessible to their intended workforce. Improving links between skills and industry in Scotland is a key element of the current economic action plan, which also places a strong emphasis on inclusivity. The Muscatelli Report, commissioned by the Scottish Government and published in November 2019, makes a case for greater collaboration between Higher Education Institutions, Enterprise and Skills Agencies, industry leaders and the Scottish Government to attract investment and foster innovation.

Planning will need to address geographical disparities in the distribution of economic growth, which might require more assessment of what is happening at a regional level. For example, Glasgow's Travel to Work Area increased in land area by 20.5% between 2001 and 2011. Meanwhile, the local authorities in Glasgow City Region with the lowest job densities (East Renfrewshire and East Dunbartonshire) also have the highest employment rates – indicating high levels of commuting from these areas into Glasgow City, which has a job density of more than one job per working-age resident and yet still has an employment rate below the Scottish average. Although there is value in planning for economic growth at a regional level, interdependencies within regions can also reduce economic sustainability at a local level, and increase the prevalence of 'pockets of deprivation'. This is beginning to be addressed in Scotland's Economic Action Plan, which references 'the importance of every place in Scotland', suggesting increased investment in local economic growth to address inequality. Scottish Enterprise has also put inclusive growth at the fore of their Strategic Framework for 2019-2022 'Building Scotland's Future Today'. Inclusive growth is not only about targeting economic growth in regional/commercial centres, but ensuring that business and employment opportunities are available in all communities: "Deprivation and affluence are all too often uneasy bedfellows; persistent, regional pockets of low employment and too few businesses realising their growth potential are damaging wellbeing in parts of Scotland." (Scottish Enterprise)

The planning system needs to become better at anticipating and preparing for changes in economic and social development. For example, the retail sector is continuing to evolve

rapidly, with internet shopping an increasingly important part of the economy. The land use system must respond to this, for example by re-evaluating the role of retail parks. Similarly, our town centres will need support and protection more than ever, if they are to continue fulfilling their role as the social and economic heart of local communities.

With the continuing economic shift towards service industries, businesses in struggling town centres could also benefit greatly from the increased footfall which would result from boosting the visitor economy. Scotland's visitor economy is of national importance, with sustainable tourism having been identified as one of the Scottish Growth Sectors. The tourism industry also plays a vital role in local economies, with urban and rural areas both offering unique visitor experiences. However, some of Scotland's tourism assets – such as the Antonine Wall World Heritage Site, for example – are not producing an economic and social benefit which is proportionate to their perceived natural, historic or cultural importance.

NPF4 should support the continued growth of tourism in Scotland by ensuring that the country's tourism assets are identified and developed in ways which enhance their value for visitors and local communities. This could involve encouraging the creation of destination clusters in towns and villages proximate to tourism assets, strengthening their links to the assets and increasing their capacity to attract and host visitors. If sites of natural or historic interest are promoted as part of the wider culture and local community in which they are situated, rather than in isolation, a sense of place will be created; making for a more immersive visitor experience, a better quality of life for residents, and a stronger addition to the local and national economy.

A well-connected, sustainable, and efficient transport system can contribute to economic growth on a national, regional and local scale. A well-managed and fair transport network can also reduce inequality by ensuring access can be achieved by all to employment, leisure and social activities. NPF4 therefore must build on the existing network by ensuring that key industry, employment and tourism destinations are well-connected by means of efficient and sustainable transport.

Research has shown that in the Glasgow City Region – and across Scotland as a whole – those on lower incomes (and those currently searching for employment) are more reliant on the bus network in order to access opportunities for employment. This currently means that the distance travelled by these groups of people for opportunities of employment is smaller compared to those on higher incomes. This reduces the overall choice and number of employment opportunities that can be accessed. NPF4 and STPR2 should therefore commit to prioritising sustainable transport interventions that will benefit public transport – especially bus journeys – and walking and cycling to ensure that transport inequalities and associated employment accessibility issues are addressed through national funding and planning resources. This will assist achieving common policy goals on social inclusion and inclusive economic growth.

In addition to transport being key to the movement of people for employment and tourism and the obvious benefits this can bring to the economy, NPF4 and STPR2 should also focus on the movement of freight and goods including how these can be transported more sustainably. In addition, NPF4 should take into account the longer term behavioural shift in

how retail and goods are consumed which is having a knock on effect on the logistics plans for haulage operations, e.g. a greater reliance on online shopping.

NPF4 Key Objectives (SPP Policy Themes)

Scottish Planning Policy (SPP) Topic	Proposed key objectives of NPF4:	Council Response
Digital Connectivity	To support the roll-out of digital infrastructure across Scotland so that the social, economic and environmental benefits of digital technologies are delivered in a way that keeps environmental impacts to a minimum.	Support in line with comments above.
Supporting Business And Employment	To promote business and industrial development that support sustainable and inclusive economic growth while safeguarding and enhancing the natural and built environments.	Support in line with comments above.
Tourism	To support the inclusive economic growth of the tourism industry in a way that benefits and strengthens the resilience of local communities, including those in rural and coastal areas.	Support in line with comments above.

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

The placemaking policy is central to improving, protecting and strengthening the special character of our places. NPF4 should continue to highlight the six qualities of successful places in Scotland, including which key assets contribute to this in each city region area. It should also set out the design tools needed to ensure key places are protected and enhanced in existing areas and created in new development areas, in particular in any future Local Place Plan areas, community growth areas and major developments. This should include mention of the international and national natural and historic environment designations, like the Forth and Clyde Canal and Antonine Wall; and habitat types, in particular ancient woodland and peatland, which have the special benefit of carbon sinks. NPF4 can ensure that the policies for how the natural, water and historic environment is protected and enhanced are consistent across Scotland.

The Glasgow and Clyde Valley Green Belt should continue to be designated because of its functions as a setting for settlements, accessible place for countryside recreation and role in directing growth towards areas of vacant and derelict land in the city region that are in need of regeneration. Without continued support for and funding of regeneration of brownfield land, the Glasgow City Region risks sprawling out with hollowing out within the city, an unsustainable development pattern. Regeneration supported by designation of the green belt should be complemented at a city region level by the identification of a strategic green network of access and habitat links and areas for integrated climate change action.

Green/ blue infrastructure should be retrofitted into existing towns and villages and encouraged as a key part of the Placemaking of new development, for the reasons outlined in response to issue 1 above – addressing climate change. Forest and Woodland Strategies have a secondary role to play in setting of settlements and recreation however their primary roles are in addressing issue 1 and issue 3 – economic development by providing a local supply of timber and fuel.

Nature-based solutions are essential if Scotland is to respond effectively to the climate crisis. Scottish Government action to support nature-based solutions, including the budget commitment to invest over £250 million in peatland restoration over 10 years, and £20 million in 2020-21 are welcomed. However, there is a need for clearer planning policy direction on when development (other than windfarm development) on peatland and carbon rich soils, and particularly Class 1, 2 and 5 soils, is appropriate. Clear national policy on peatland development should take the 2017 SNH Peatland Survey Guidance as its starting point and take into account the implications of built development on peatland on carbon emissions, habitat impacts, drainage and hydrological implications. In particular, strong consideration should be given as to whether NPF 4 should introduce a moratorium on development on Class 1 Peatland to support the Scottish Government's 2045 net zero target, assist adaptation to the effects of climate change, and respond to the important role of peatland in reversing biodiversity decline.

Sustainable tourism has been identified by the Scottish Government as a growth industry, and according to Visit Scotland's research, Scotland's landscapes are consistently one of the main reasons people visit, closely followed by a desire to experience history and culture. It is therefore vital for the future of Scotland's economy, and international reputation, that the

character of natural and historic places is both promoted and protected. In addition to looking after existing tourism assets, NPF4 will should proactively encourage developments which contribute to the growth of Scotland’s visitor economy and enhance the value of places for people who live there.

NPF4 Key Objectives (SPP Policy Themes)

Scottish Planning Policy (SPP) Topic	Proposed key objectives of NPF4:	Council Response
Green Belts	To direct planned growth to the most appropriate, sustainable locations whilst protecting and enhancing the character, landscape setting and identity of settlements and providing access to countryside recreation.	Support in line with comments above.
Green Infrastructure	To protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking.	Support in line with comments above.
Historic Environment	To support the understanding, protection and importance of the historic environment so that the cultural, social, environmental and economic value of our heritage continues to contribute to Scotland’s well-being.	Support in line with comments above.
Natural Environment	To protect, enhance and promote access to our natural environment; whilst supporting their sustainable use and securing positive effects for biodiversity when considering new development. This includes identifying and affording protection to international, national and locally designated areas and sites in development plans and development management, including having regard to the desirability of preserving peatland.	Support in line with comments above.
Peatland	To have regard to the desirability of preserving peatland so that climate change benefits of reducing emissions and other benefits including to air and water quality, biodiversity and habitat creation and flood alleviation are realised.	Support in line with comments above.
Placemaking	To deliver sustainable, well-designed places and homes that meet the needs of people living in Scotland including, in particular, the housing needs for older people and disabled people. This will be done through a design-led approach	Support in line with comments above.

	which demonstrates the six qualities of successful places.	
Tourism	To support the inclusive economic growth of the tourism industry in a way that benefits and strengthens the resilience of local communities, including those in rural and coastal areas.	Support in line with comments above.
Vacant And Derelict Land	To prioritise the use of vacant and derelict land so that viable development takes place on appropriate sites ahead of greenfield land as part of priorities to deliver inclusive growth and sustainable places and responding to the climate emergency.	Support in line with comments above.

National Developments

Current	Proposed	Council Response
	Glasgow City Region Vacant and Derelict Land Regeneration	Given that 40% of Scotland's vacant and derelict land sits within the Glasgow and Clyde Valley City Region, tackling this issue through this proposed national development would have a significant impact on equalities and the environment. Analysis by the City Region demonstrates the spatial relationship between vacant and derelict land and areas of multiple deprivation. The national development should commit funding to a delivery team to action remediation of prioritised sites for development or greening.
	Clyde Mission – Project area to encompass Clyde River basin and tributaries, project scope to include redevelopment of Clyde waterfront, climate change adaptation and mitigation, impact on tributaries and appropriate development.	Clyde Mission should be included as a new national development reflecting the need to consider climate change impacts across the river basin and tackle significant vacant and derelict land along the Clyde.

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

The Council believe NPF4 and STPR2 should follow the recommendation as set out by the Infrastructure Commission for Scotland to prioritise all investment decisions based on their contribution to the delivery of net-zero targets. This includes investment decisions about current infrastructure and new infrastructure. In response to the Scottish Government declared climate emergency and the vision of the National Transport Strategy 2, infrastructure should be in place that allows journeys to be made easily by walking, cycling and public transport to reflect the Sustainable Travel Hierarchy.

The effectiveness of current infrastructure should be maximised to improve the public transport network. This includes improving current rail infrastructure to improve the performance and reliability of services for existing and potential customers. This is important to delivering an effective transport network that attracts more people to travel less by private car and deliver associated benefits for the environment and the economy.

Infrastructure should also be in place which supports sustainable travel from new development. This includes embedding new walking and cycling infrastructure at the heart of development proposals and where required link new development to existing public transport networks.

There is a need to identify key green/ blue infrastructure developments needed at a city region level, including those identified as part of the Glasgow Metropolitan Drainage Partnership; Clyde and Loch Lomond Flood Risk Management Strategy and Surface Water Management Plan and Scotland's National Peatland Plan.

There is a need to identify at a city region scale the need and opportunities for the following: key waste management development opportunities needed to meet the requirements of the Zero Waste Plan, heat networks and decentralised energy/ renewable energy provision. See also the need for spatial frameworks for wind energy and other renewables identified in relation to Issue 1 – climate change.

The Scottish Government's Infrastructure Investment Plan has three long-term objectives: inclusive economic growth, tackling the global climate emergency, and building sustainable places. To help Scotland achieve these objectives, NPF4 will need to make infrastructure provision a priority, ensuring that the capacity of existing infrastructure is considered as part of all new development. For the first objective in the Infrastructure Investment Plan (inclusive economic growth), planning has an essential role in connecting places via both transport infrastructure and digital infrastructure, to ensure that communities are not excluded from engaging in new economic opportunities. Scottish Government's Economic Action Plan 2019-2020 includes the delivery of the Digital Scotland Superfast Broadband Programme and development of a new 5G strategy, the planning implications of which will also need to be considered in NPF4.

It is important that NPF4 includes a sufficient policy framework for the safeguarding of workable mineral resources while protecting local communities, the environment and the built and natural heritage. The maintenance of land banks is best addressed at a regional level – a continuation of the existing Clydeplan approach within future RSSs would be appropriate. Given the varied nature of mineral deposits across Scotland, a criteria based approach for the

identification of new quarries or mineral extraction opportunities would be more practical, rather than a requirement to map ‘areas of search’ within all development plans.

In terms of the impacts of extraction and restoration of mineral sites, it is suggested that any policy framework should include a requirement for net biodiversity gain, given the rural character of former mineral sites and significant potential for adding value to the green network and creating carbon sinks. The Council would also suggest incorporating climate change mitigation and adaptation as a key part of the assessment criteria, in line with key national targets including net zero carbon emissions by 2045. This could include, for example, a requirement to prepare a ‘*Sustainability Statement*’. The health and wellbeing of local communities should also form a key part of any revised assessment criteria, in line with the emerging approach of integrating Public Health Scotland priorities (vibrant, healthy and safe places and communities) within the planning and development system.

In relation to unconventional oil and gas extraction, the Council acknowledges and supports the Scottish Government decision, and notes that this position aligns with the national de-carbonisation agenda and climate change targets relating to renewable energy and a long-term reduction in energy consumption.

NPF4 Key Objectives (SPP Policy Themes)

Scottish Planning Policy (SPP) Topic	Proposed key objectives of NPF4:	Council Response
Digital	To support the roll-out of digital infrastructure across Scotland so that the social, economic and environmental benefits of digital technologies are delivered in a way that keeps environmental impacts to a minimum.	Support in line with comments above.
Infrastructure	To promote the alignment of development and infrastructure at the local, regional and national level by identifying infrastructure capacity, need and what is required to support its delivery.	Support in line with comments above.
Mineral Extraction	To safeguard workable resources and ensure that an adequate and steady supply of aggregates is available to meet demand whilst ensuring that the impacts of extraction on local communities, the environment and the built and natural heritage are properly addressed. The policy will also reflect the Scottish Government’s finalised policy position on unconventional oil and gas.	Support in line with comments above.
Transport	To ensure that new development supports delivery of the vision and	Support in line with comments above.

	priorities set out in the National Transport Strategy	
Waste	To support the management of waste in line with the waste hierarchy (waste prevention; reuse; recycling; energy recovery and waste disposal) and to guide development for new infrastructure to appropriate locations.	Support in line with comments above.

National Developments

Current	Proposed	Council Response
Metropolitan Glasgow Strategic Drainage Partnership – Water and drainage infrastructure investment to build climate change resilience and unlock potential development sites.	No change.	The Metropolitan Glasgow Drainage Partnership should be retained as a national development, as a delivery mechanism for actions identified in the Clyde and Loch Lomond Flood Risk Management Strategy and Surface Water Management Plan.
High Speed Rail–Improving connections to the UK and Europe, strengthening links between cities.	No change.	High speed rail links between cities and to the UK and Europe should be included as a national development as if it aligns with national transport policy priorities in NTS2 – reduces inequalities, takes climate action, helps deliver inclusive economic growth.
Strategic Airport Enhancements – Supporting the main airports as gateways and recognising the importance of lifeline air links. Identified airports: Aberdeen, Edinburgh, Glasgow, Inverness and Prestwick. Wider investment zones supported at Edinburgh, Glasgow and Prestwick.	No change.	Whilst all industries, including aviation, will need to evolve their business models to contribute towards mitigating climate change, and other transport infrastructure will be required to facilitate low carbon, high speed travel, it is recognised that NTS2 notes the importance of regional airlines operating between Scotland’s islands and its cities, and between Scotland and places where rail is not an effective alternative for

		businesses, such as to the south west of England.
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