

## APPENDIX 2: National Planning Framework 4 Informal Consultation – Proposed Response

Question 1: What development will we need to address climate change?

The spatial strategy set out in the second Strategic Development Plan (SDP2) provides for a future growth of the south east Scotland area and can be used to inform the regional spatial strategy for the area. However, the spatial strategy needs to respond to both the challenges and opportunities presented by climate change. Although SDP2 was rejected by the Minister there was no indication that the spatial strategy of SDP2 not acceptable to the Minister, rather the issue was in relation to assessment of the transport implications arising. If the South East of Scotland is to continue to be the engine room of national economic growth in Scotland, the levels of growth set out in SDP2, and the associated spatial strategy, will have to be supported. NPF4 should ensure that investment can be co-ordinated to deliver the spatial strategy and allow anticipated levels of growth to be achieved. The SDP2 action programme identified the necessary infrastructure to support the spatial strategy. Matters which NPF4 should have regard to are:

- Providing an enabling role to address inefficiencies of existing buildings and bringing buildings up to standard and recognise that emerging technologies now may not fit by 2050
- Provide for grid enhancement to meet current and future demand and energy shift from gas to electric; promote the conditions for smarter use of the grid
- Provide for the re-use of redundant energy infrastructure; for example, the current pipe network is ill equipped to switch to hydrogen use
- Infrastructure providers are maintaining existing assets which at some point in the future will become redundant; a what point should this cease
- Allow for stricter planning controls to be applied to allow provision of new technologies to be delivered and implemented e.g. if requirements for EV charging points are not met planning permission should be refused
- Requiring new buildings to achieve a high level of energy efficiency (carbon neutral where possible) and to be delivered in the most sustainable way possible with these objectives to be achieved through changes to Building Standards Regulations.
- New buildings should utilise low maintenance or maintenance free designs to ensure that poorly maintained external finishes do not detract from the streetscape
- Provide powers to local authorities to enforce requirements/working together; provide for mandatory planning conditions
- Create the conditions for a joined-up approach to delivery of development incorporating an 'infrastructure first' approach
- Create opportunities for increased tree planting to help address climate change
- Encourage the use of pre-fabricated buildings and address supply chain issues
- Create the conditions for restoring fragmented natural habitats and integrating these with sustainable surface water drainage infrastructure, flood storage etc; address flooding and flood risk; increase use of green roofs; reduced reliance on potable water for flushing using grey water reuse technologies
- Only bring forward development which can be connected to sustainable transport therefore reducing reliance road traffic

- Promote community growing areas to promote health and healthy eating; community growing areas could contribute to addressing flooding
- Create the right conditions to support businesses contributing to the climate change agenda by designating areas to support businesses in this field and promote local employment agreements
- Provide support for ambitious local authorities who want to take things further to promote economic growth within a sustainable environment.

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

West Lothian is characterised by economic success which contributes towards quality of life, health and well-being. However, there are pockets of deprivation. NPF4 can assist in maintaining economic success by safeguarding strategic areas and providing the support for delivery of infrastructure to deliver on development requirements. This could be facilitated by the inclusion of reference in NPF4 to:

- Support for quality education facilities; good quality jobs and employment opportunities and energy efficient and affordable homes
- Providing incentives to promote/encourage location of new development and investment in areas suffering disadvantage to support social inclusion
- Protecting the rural environment
- Providing a strong regulatory framework for decision-making and a more consistent approach by Scottish Government via the DPEA in decision making and to remove right of appeal where the development plan is up to date
- Providing for enhanced powers to local authorities for land acquisition to facilitate investment and growth.
- Support for enhancement of the public transport network to achieve sustainable travel aspirations and contribute to the climate change agenda.
- Provide support for sustainable connected, diverse urban communities of mixed developments with active travel and public transport and attractive, rich, naturalised open spaces at their heart.
- Ensuring that the housing needs of older people and disabled people are met and the creating the conditions to help facilitate a joint approach to health and housing, ensuring that we are adapting to an ageing population, meeting the needs of those with disabilities and providing affordable housing for key workers.

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

To respond to economic change and be adaptable a policy framework is required which provides certainty to businesses and communities but is flexible enough to respond to economic change which could occur rapidly and is unpredictable. To support this NPF4 should:

- Place emphasis on more skilled and quality employment as support all parts of the community in accessing these opportunities
- Provide support for distribution centres linked to public transport routes/rail network to support ease of access and delivery of goods
- Support measures to provide energy from waste
- Encourage local food growing (industrial agriculture) and local distribution
- Provide a policy and regulatory framework to provide sufficient land for economic growth; promote regeneration and redevelopment of existing under utilised sites particular where these can be accessed in a sustainable way.
- Secure improved drainage and flood systems which would contribute to sustainable development, environmental protection, reduce flood risk and contribute to the climate change agenda
- Provide powers to local authorities to forward-purchase land, prescribe what developments should look like and allow the combination of planning powers with the rights as landowner to prescribe what new development will comprise.

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

West Lothian contains a number of sites which are tourist destinations in their own right. Whilst it is recognised that Edinburgh as the capital city is a significant draw, areas outwith the capital should be promoted as destinations of choice however making more of our resources also needs to be balances against the need to protect them. To achieve this, the following matters should be considered:

- Provide greater protection for our natural heritage from the effects of population growth and development than it currently enjoys
- Take action to encourage and support brownfield development in favour of greenfield
- Provide for a joined up approach to funding necessary infrastructure
- Promote the use of vacant and derelict land for the production of biomass and integrating this with combined heat and power generation and disposal to ground of sewage.

Question 5: What infrastructure do we need to plan and build to realise our long-term aspirations?

New infrastructure and investment in current infrastructure will be required to support sustainable economic growth. The type of infrastructure we will require in the coming decades is anticipated to evolve as demands change and we look to more sustainable infrastructure solutions. NPF4 needs to b and provide the necessary mechanisms for investment and delivery. Influencing matters which should be considered in drafting NPF4 are:

- Increased investment for existing transport infrastructure (e.g. roads, footways, bridges, culverts, street lighting)

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- Improve transport connections, transport hubs, cheap, efficient and affordable transport including smart ticketing
- Greater use of rail freight and canal network
- District/communal heating within new developments and creating the conditions for adaptation within existing developments.