

Response to National Planning Framework 4 'Call for ideas', April 2020

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

The need to reduce carbon emissions needs to be at the heart of planning policy and planning decision making.

Sustainable locations

Development, first and foremost, needs to be in sustainable locations, which reduce the need to travel and make travelling by sustainable modes easier. As a minimum NPF4 should, for example, set a benchmark that new housing development should not be supported if it is not accessible or cannot be made accessible by regular public transport services or is easily accessible by active travel modes.

In many instances, prioritising sustainable locations will mean prioritising brownfield sites over greenfield, edge of settlement sites. This has clear advantages over greenfield releases which act to push development and thus populations, to the urban fringes, consuming prime agricultural land and greenspace, over-stretching infrastructure and services, creating car-dependent communities which increase the effects of climate change and live unhealthier lives, and depopulating more sustainable town centres. Whilst Local Development Plans already aim to guide development in this way, this principle needs to be reinforced through National Planning Framework. The redevelopment of brownfield sites, particularly in lower demand areas, requires a greater focus in terms of public sector intervention recognising that there are often legacies of contamination that make such sites unattractive to the market. If we are serious in developing such 'difficult' sites, funding will need to be aligned.

Low carbon building techniques and technologies

More pressure at the national level needs to be put on developers, particularly typical national housebuilders on developing low carbon homes which are of high quality and a more innovative design. An important part of this is, not only incorporating low carbon technologies into new homes but also embedding multi-functional green spaces, both private and public, within developments.

The development industry is changing as a result of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and forthcoming changes to the Building Standards Regulations. This change needs to be embedded within Planning at the national level, with the Buildings standards targets seen as the minimum required; we should be aspiring for more. The interaction with the building standards regime needs to be clearly set out. NPF4 should encourage the use of low carbon technologies and the use of electric vehicles and ensure there is sufficient guidance for electric charging points in urban and rural areas. Local authorities should be working closely with Scottish Government's low carbon team to ensure that these types of applications can be appropriately assessed. Developers should be required to future proof new residential developments for low carbon technologies and electric vehicle chargers.

In addition, more guidance needs to be given on planning for different renewable energy technologies and from different energy sources (minewater, rivers, and sewers) whether domestic or on a larger scale to inform LDP policies

The transition to low carbon building and maintenance techniques is applicable to the existing and historic environment as well as to new build development. If historic building are to adapt to climate change, there needs to be flexibility in terms of the way we manage and look after such buildings.

Balanced approach to renewable energy

The shift to a zero carbon energy system is central to the response to the climate change agenda. The role of renewable energy is fully accepted.

Renewable energy projects should be supported, but not at the expense of all other considerations. Similar to many rural areas throughout Scotland, East Ayrshire has experienced huge demand for onshore wind over the last 10 – 15 years. However, this occurred in the absence of any planned national approach to how ambitious targets for renewable energy generation should be achieved spatially. Moving forward, it is assumed the long term plans and aspirations of the key industry operators will be made known as part of the NPF process, if a strategic approach is to be taken.

Given the level of development that has now taken place and is in the pipeline, capacity for further development is fast disappearing. A spatial approach to wind energy development is needed, in order that wind energy development is plan led and to provide greater clarity to the renewables industry and communities. The spatial approach should allow planning authorities to assess if or how they can continue to support wind energy development. NPF should allow planning authorities through Local Development Plans, to have the ability to, where there is a clear evidence base, identify areas where the cumulative impact of development is so great, that there is no capacity for further wind farm development. In such instances, local authorities should have the authority to say no to further development. This means accepting that local landscapes are important and that a community's sense of place should not be dismissed when balanced against the need for renewable energy generation.

Onshore wind developments should be required to plan more long term and with broader horizons, particularly in relation to storage and distribution of energy, and considering whether other forms of renewable energy could be incorporated within their sites to maximise energy output.

Offshore wind requires greater support and incentive, particularly in the context of the diminishing capacity for further acceptable onshore wind development.

EFW has to be considered also and should not be to the detriment of communities. Location is important but transport issues feature prominently as waste contracts bringing waste from multiple authorities are needed to supply 'feed stock' for the incineration/heat process methodology used.

Managing flood risk

Flooding is a major issue across all local authorities in Scotland. SEPA's 1 in 200 year flooding event projections/maps mean that much of our urban areas in East Ayrshire cannot be developed and the redevelopment of brownfield sites cannot take place, which has significant social, economic and environmental consequences. A creative, forward thinking approach is needed to flood risk. Instead of blanket bans on development, the emphasis should be on exploring innovative ways to manage flood risk, looking at long term strategies that can be taken forward.

NPF4 should ensure that local flooding strategies/action plans are part of Local Development Plans and are a consideration in the decision-making process. In addition, NPF4 should provide some direction in how local authorities should be planning for the increase in flood risk from climate change, as a means of integrating climate resilience into developments.

NPF4 should encourage and raise the importance natural flood management and encourage the use and integration of Natural Flood Management Techniques within and across authority boundaries. The presence of this within NPF4 will incentivise the adaptation of these techniques, highlighting their benefits in terms of climate resilience, habitat enhancement and agricultural productivity.

Addressing how Scotland deals with waste

At a national level, the sustainability of how we manage and deal with waste needs to be planned for. Further capacity is required to stop the practice of sending waste to other parts of the world. This is integral to our overall response to climate change and environmental responsibility.

The polluter pay principle should be embedded in policy. There must also be more emphasis placed on the packaging industry.

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

The approach to housing delivery

The approach to housing delivery needs fundamentally re-examined. East Ayrshire Council will provide detailed comments on the separate discussion paper on this.

Ensuring placemaking is embedded in planning

Better placemaking needs to be embedded in all levels of planning. Planning authorities need the tools, through NPF, to drive the quality of development up and developers need certainty over the standard of developments that will be required. For example, quality open space, active travel connections and a range of house types should be standard requirements for new housing developments.

Re-populating rural Scotland

Re-population of rural Scotland is a complex objective and one that needs to be carefully considered. Development should continue to be sustainable, with a focus on how people access services and move about the area. The desire for rural repopulation should not result in an increase in ad hoc residential development within our rural area, which does not support the character of the countryside or sustainability principles. Over development in the rural area should be avoided. There is a requirement to recognise the existing rural residential demand which is being experienced in authorities across Scotland. This should be addressed at the national level, through NPF4. In East Ayrshire, there is a significant demand for residential dwellings in the countryside, outwith settlement boundaries, both within and outwith existing residential clusters. This is changing the landscape character and setting of rural locations. Should this demand continue at the current rate, the

appearance, character and setting of the rural landscape of Scotland could be greatly and irreversibly altered. This issue is not unique to East Ayrshire, and is likely experienced throughout Scotland. NPF4 should address this issue from the following perspectives: landscape implications, habitat fragmentation and loss and, critically, ensuring a sustainable approach to development.

Collaborative planning

NPF should recognise the need for planning to work collaboratively with key agencies and partners in health and social care, education, infrastructure provision and transport to ensure that local services and infrastructure can be sustained as more housing developments come forward. Planning authorities, working alongside their partners, must look to the long term to ensure service provision keeps pace with development.

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

Ambition is needed

NPF needs to be ambitious in relation to enabling economic growth and inward investment.

Rebalancing development across Scotland

At a national level, there needs to be consideration of the needs of different parts of Scotland. Economic activity, investment patterns and associated demand for house building, contrasts significantly across Scotland, particularly in terms of an east-west divide across central Scotland. NPF4 needs to recognise this and recognise that for inclusive growth across the country to be achieved, NPF should prioritise investment in areas where growth lags behind. NPF should ensure a regional approach is taken to enable economic growth; the indicative RSS's will assist with this.

Supporting growth deals

The growth deals that are being proposed and taken forward across the country offer the opportunity for transformational change on a regional or wider basis. NPF4 should support the delivery of these projects and the infrastructure provision required to allow for the delivery of growth deal projects.

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

Town centre first

Focus should remain on the town centre first principle, for a wide range of uses. Town Centres need to evolve away from their traditional retail role into hubs where the full range of social, health, cultural and leisure activities are concentrated. Decisions to direct such uses in non-town centre locations should be exceptions to the norm and should only be supported where there is particularly reasoning.

Valuing and protecting our peatlands

We need to protect and encourage enhancement and restoration of peatland and other carbon rich soils, recognising the multiple benefits they offer, for carbon retention, natural flood management and biodiversity. National policy needs to recognise this and presume against the disturbance and/or removal of peatlands. Going forward, protecting peatlands and peat bog habitat has to be a national priority.

Recognising local designations

National policy needs to recognise the importance of local designations and features that are unique to their area. In East Ayrshire, for example, the UNESCO Galloway and Southern Ayrshire biosphere and the Galloway Dark Sky Park are unique designations that have the potential to contribute significantly to both tourism and the sense of place of local communities. Locally valued landscapes must also be recognised as central to the special character of our places and to the sense of place of communities living within the landscapes.

Prioritising the re-use of vacant and derelict land

Similar to earlier comments, NPF must set out how the re-use of vacant and derelict land will be prioritised and delivered. Vacant and derelict land, at all scales, has a significant impact on the character of our places and requires a real commitment to address, which must be set out in NPF.

Greening is one option for the re-use of vacant and derelict land and as such the continuation of the Central Scotland Green Network (CSGN) is critical. It is noted that the CSGN Trust is now a statutory consultee for Local Development Plan purposes, which suggests the CSGN is to be maintained. It is important that the implementation of the CSGN and the difference it is making is monitored. Whilst it is acknowledged that it is a long term project and ambition, it is importance that progress is being made and that this is reflected across the CSGN area. It is suggested that there is a particular opportunity for more priority to be given to greening opportunities within small settlements, often in low demand areas, where vacant and derelict sites, often relatively small in scale, have a significant impact on the amenity and sense of place of communities. There is a real opportunity for this to be addressed as part of the CSGN, and perhaps aligned to a review of vacant and derelict land funding.

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

Links to the Strategic Transport Priorities Review

Any identification of infrastructure requirements set out in NPF must then link to STPR2 and the investment priorities that will be delivered through STPR2. Critically, STPR2 must take account of local circumstances and needs, and should not overlook rural priorities and those outwith the central belt. East Ayrshire Council continues to make this clear in all engagement on STPR2. East Ayrshire priorities will be reflected in an Ayrshire context in the indicative RSS and are summarised below.

Key transport interventions

Given the climate emergency and climate change bill, we need to focus on achieving a major shift onto public transport and away from a reliance on the car. This will also help to break barriers in terms of poverty, social deprivation and access to services. It is unrealistic to expect this to take place when public transport provisions and infrastructure are inadequate. This will not happen

without significant investment in infrastructure. Within East Ayrshire there are two key issues in relation to this; (i) the limitations of rural transport in terms of routes, frequency and cost and; (ii) the connections from Ayrshire to the Glasgow conurbation and the need to address peak time congestion on the M77 corridor. In relation to the first issue, a serious intervention and investment is needed by government to make rural public transport viable; this is likely to be with regards to electric buses, use of biofuels and hydrogen transport.

Whilst public transport infrastructure is critical to achieving carbon emission targets, improvements to the roads infrastructure is essential for enabling inclusive economic growth. In particular, major recent infrastructure projects on key corridors such as the M8, M74 and M80, have left areas such as Ayrshire, and indeed the wider area of South West Scotland, lagging behind. Transport infrastructure limitations generally in the region are a major inhibitor to inclusive economic growth. The Bellfield Interchange in Kilmarnock, in particular, is of strategic importance and currently limits investment and development both close to the interchange and further afield throughout Ayrshire and beyond. Links across East Ayrshire to the M74 are also critical; improvements to the A71 and A70 could address East Ayrshire's challenges in terms of its relative isolation and remoteness.

National developments

East Ayrshire Council recognises that the Call for Ideas is not a formal consultation and that, as the name suggests, its purpose is to stimulate debate and encourage ideas. The Council does however recognise that NPF4 is likely to identify national developments, similar to the approach in the current NPF and that it may be helpful for the Council to, at this stage, put forward briefly the key strategic priority developments in East Ayrshire that should be considered as national developments.

The significant emerging developments in East Ayrshire are primarily connected to the Ayrshire Growth Deal, for which Head of Terms were agreed in March 2019. Most notably, the growth deal includes the National Energy Research Demonstrator (NERD) to be based in Cumnock, which will provide a centre of excellence and a suite of in the field demonstrator projects, aimed at transforming the way we generate, store and distribute energy. The AMIC (Advanced Manufacturing Investment Corridor) will be based around Kilmarnock and will see a new innovation centre focussed on food and drink manufacturing being developed. More information on these projects can be provided as and when required.

In addition, as noted in response to some of the questions above, transport infrastructure in Ayrshire and indeed South West Scotland as a whole is a major barrier to future economic prosperity. In particular, the Bellfield Interchange in Kilmarnock, which is at capacity is a major barrier to all forms of development in Kilmarnock (residential, business and industry and more) and far further afield, given it is the key interchange for a number of trunk roads in the area. As part of the LDP preparation process and the preparation of business cases for the growth deal, further work is currently being carried out to examine the development potential of land around the interchange and options for improving the interchange itself. This work, and the resultant proposals that will stem from it, should be considered of national importance.

The Council would be happy to engage in detail with the NPF team on these matters and look forward to doing so as the NPF process progresses. It should also be noted that these priorities, as well as others, will be brought forward within the Ayrshire indicative Regional Spatial Strategy that currently under preparation.