

SOUTH LANARKSHIRE COUNCIL

National Planning Framework 4 Early Engagement

AIR QUALITY

Air quality has never been more important especially given the emerging evidence showing correlation globally between areas with chronic air pollution problems and the more negative outcomes to Covid-19. It is therefore essential that Governments ensure effective policies are in place to secure the cleanest possible air quality, and planning policies can greatly assist in this.

As a means of doing this, it is recommended that the good Design Principles set out in the EPUK and IAQM document: Land-Use Planning and Development Control: Planning for Air Quality January 2017 should be employed during the planning process in order to protect quality of life, health and wellbeing for the future. This document notes that land use planning can play a critical role improving local air quality (and therefore health) and that the pattern of land use determines the need for travel, which in turn is a major influence on transport related emissions.

Road transport pollution is the single biggest source of poor air quality in Scotland. Indeed there are currently 38 Air Quality Management Areas throughout Scotland, the majority of them declared as a consequence of road traffic pollution. Policies that suppress the demand for travel by road or that support and develop sustainable transport are essential to assisting Scotland achieving it's targets for the future in terms of it's carbon reductions and the transition toward electric and sustainable forms of transport as well as compliance with the National Air Quality Objectives. In addition, policies that promote high quality building standards, reduce energy use, and require the preparation of low emissions strategies, can help to reduce local emissions of air pollutants.

Suggestions from the above guidance that should be considered include:

- Policies that enforce high building standards can play an important role in reducing emissions from services that provide heating and hot water – an increasingly important sector as measures to tackle transport emissions are tightened.
- The land-use planning system has significant potential to influence local air quality positively through the careful design of neighbourhoods. Some actions which are strongly encouraged include:
 - Full integration of the inputs of the planning, transport, housing, education and environment services to ensure that environmental considerations, including those related to air quality, are considered at the earliest stages of the strategic planning processes;
 - Ensuring public services are joined up and easier to access via public transport or other sustainable choices such as cycling and walking; and
 - Giving careful consideration to the location of developments (e.g. within the development of Site Allocation Policies where particularly sensitive members of the population are likely to be present e.g. school buildings should generally be sited 100m or more away from busy roads, in areas where pollution concentrations are high.
- Cumulative impact should also be considered as many individual schemes, deemed insignificant in themselves, contribute to a “creeping baseline”.

The principles of Good Design should include:

- New developments should not contravene Air Quality Action Plans, or render any of the measures unworkable;
- Wherever possible, new developments should not create a new “street canyon”, or a building configuration that inhibits effective pollution dispersion;
- Delivering sustainable development should be the key theme of any application;
- New development should be designed to minimise public exposure to pollution sources, e.g. by locating habitable rooms away from busy roads, or directing combustion generated pollutants through well sited vents or chimney stacks.

Equally it is considered that detailed guidance on minimum standards that new developments should meet should be set. Examples include

- Minimum standards for Electric Vehicle (EV) “fast charge” points eg per 10 residential dwellings and/or 1000m² of commercial floorspace. Where on-site parking is provided for residential dwellings, EV charging points provision for each parking space should be made.
- Where development generates significant additional traffic, provision of a detailed travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety.
- All gas-fired boilers to meet a minimum standard of <40 mgNO_x/kWh.
- All gas-fired CHP plant to meet a minimum emissions standard of:
- Spark ignition engine: 250 mgNO_x/Nm³;
- Compression ignition engine : 400 mgNO_x/Nm³; ° Gas turbine: 50 mgNO_x/Nm³.
- A presumption should be to use natural gas-fired installations. Where biomass is proposed within an urban area it is to meet minimum emissions standards of:
- Solid biomass boiler: 275 mgNO_x/Nm³ and 25 mgPM/Nm³.

In addition to these good practice principles, additional measures to offset emissions should be encouraged at an early stage in the design process. It is important that obligations to include offsetting are proportional to the nature and scale of development proposed and the level of concern about air quality; such offsetting can be based on a quantification of the emissions associated with the development. These emissions can be assigned a value, based on the “damage cost approach” used by Defra, and then applied as an indicator of the level of offsetting required, or as a financial obligation on the developer. Unless some form of benchmarking is applied, it is impractical to include building emissions in this approach, but if the boiler and CHP emissions are consistent with the standards as described above then this is not essential.

In an effort to meet carbon reduction emissions and improve air quality, the Scottish Government’s Programme For Government 2017 set ambitious targets to promote the electrification of the road network, with the aim of removing the need for new petrol or diesel cars or vans on Scotland’s roads by 2032. In order to achieve this, the necessary infrastructure requires to be in place and planning has a crucial part to play in this. The EPUK and IAQM document: Land-Use Planning and Development Control: Planning for Air Quality January 2017 as mentioned above gives clear guideline on the infrastructure requirements to be embedded into new developments during the operational phase.

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GREEN BELTS

The Council is of the view that the policy approach to green belts could be improved through the provision of a clearer definition and degree of differentiation between the green belt and the wider rural area. Current policy does not provide sufficient distinction between the two areas with the result that the sensitivity of the most important green belt areas can be somewhat eroded. At the same time the meaning of the concept for the wider public has become eroded and therefore clarity should be provided that it is not a 'no go area' and on the forms of development that may be acceptable in the green belt.

More prescriptive advice could be provided in NPF4 in terms of assisting with the designation of green belts. However the role of identifying and defining green belts should be retained by local authorities, who hold the required local area knowledge to appropriately determine the extents of these areas.

It is considered that NPF4 should take a lead in terms of ensuring that the overall spatial strategy deals appropriately with climate change mitigation. Indeed the overall purpose and objectives of green belts should be reviewed so they address current issues. However, this is not considered to be specifically a green belt issue.

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National Planning Framework 4 Early Engagement – Policies

CLIMATE CHANGE AND SUSTAINABILITY

As a starting point climate change and sustainability objectives must be placed at the centre of NPF4 with all other policy topics a secondary and subservient tier to the principle of addressing the climate emergency.

Overall SPP does not currently provide clear guidance on how to address climate change and includes measures that either could not be easily implemented or would be impossible to achieve. The understanding of the issues have evolved since then and therefore it is anticipated a more overarching and joined approach will be adopted in NPF4 which will give planning authorities a better basis to include achievable and realistic policies in their LDPs.

NPF4 is the one big opportunity to place the planning system at the heart of the climate change agenda. Policy must be achievable and encourage all with an interest in addressing the climate emergency to change their practices. Climate change policies must be essential requirements ('must haves') not optional ('should haves').

SPP needs to establish what's the priority? Delivering more houses or fixing climate change. One problem is the amount of developable land in the pipeline (either consented or landbanked). There is a need to encourage developers to take account of NPF4 and develop good multi-functional 'climate-positive' design, for example Homes for Scotland could provide guidance and encourage their members.

Policy on sustainability needs to shift from "sustainable" to "sustainable and inclusive economic growth" to bring the required focus on equalities issues and go further in the light of the climate emergency. There should be a reference to the proposed legislative ambitions for Scotland to become carbon neutral by 2040 and net zero greenhouse gas emissions by 2045. Adaptability and retrofitting is critical to achieve this.

More effective use needed of SEA and sustainability appraisals within site assessment activities. In addition sustainability needs to be given more emphasis in the Place Principle. The existing SPP presumption in favour of... is a contradiction and the presumption in favour of sustainability is too broad – sites should be considered on their own merits not on the basis of an exemption based on a numbers game.

The planning system can make a great contribution to the climate change agenda however planners must have the knowledge and tools to implement policies and the confidence and certainty that their views will prevail. Need a tool that enables us to understand the potential climate change impacts of different types of developments and designs.

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NPF4 Early Engagement Response

The following sets out South Lanarkshire Council's response to the Early Engagement on National Planning Framework 4 (NPF4). The Council will respond to the Draft NPF4 when it is published in later 2020 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. This will require the way in which we plan for the economy and communities needs to change.

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.

- New development and infrastructure should seek to reduce transport's contribution to climate change by ensuring new development enables the delivery of associated sustainable transport infrastructure and encourage active travel and the use of public transport by addressing the location, density and design of new development. Electric vehicles are part of the solution but the priority should be on a modal shift to active travel and public transport.
- Introduce a requirement for developers to demonstrate that their proposals maximise heat and energy efficiency, by placing greatest emphasis on energy reduction through the following the incorporation of renewable energy, including renewable heat, as a means of reducing the carbon footprint of new development. NPF4 should set out a requirement for statements on the energy use and sustainability of new development and define the necessary standards for these.
- In terms of climate change adaptation, the safety and resilience of communities and ensuring our critical support systems, such as energy, water, communications and transport infrastructure, should be protected from the accelerating effects of climate change including flood and heat events. This can include
 - maximising the opportunities of new development to enhance resilience by reducing the causes of flooding;
 - including a drainage hierarchy to be applied to all new development to reduce the rate and volume of surface run-off;
 - strengthening policy on the siting and design of new development to reduce flood risk and maximise resilience;
 - show how new development will minimise energy consumption;

- enable advances in technology, new economic sectors, and new links between existing sectors which may arise from the transition to a zero carbon society and work towards creating a circular economy.

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. The provision of green infrastructure needs to be placed at the heart of future development given its contribution to 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.

At an individual 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.

Directing development to sustainable brownfield locations maximises the use of existing infrastructure and assets, integrates land use with sustainable transport network, recycles previously developed land and prevents urban sprawl reliant on the private car. This offers opportunities to renew the urban fabric to carbon neutral standards and 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.

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.

NPF4 presents an opportunity to start the process of overhauling the housing system in line with the vision and principles of 'Housing to 2040' that leads to the delivery of a greater range and type of new housing that is tailored to meet the needs of future residents.

In terms of 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. 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.

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. Planning authorities could be given the ability 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. 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. Support should be given to linking surrounding neighbourhoods with the town centre, through a high quality green network. The access to quality greenspace and green networks has enormous health benefits to local communities and potential to significantly reduce health inequalities.

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 to 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. The key challenge will be to ensure that premises and infrastructure meet changing business needs. In particular, the businesses of the future are likely to require more central locations and therefore encouragement of 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 will be important.

It is equally important to facilitate indigenous economic growth by providing sites for business which are accessible to their intended workforce. The planning system can help address geographical disparities in the distribution of economic growth. Inclusive growth should ensure that business and employment opportunities are available in all communities.

The planning system should embrace anticipating and adapting to 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. Businesses in struggling town centres could benefit 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.

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.

4. What policies are needed to improve, protect and strengthen 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. NPF4 can ensure that the policies for how the natural, water and historic environment is protected and enhanced are consistent across Scotland. It should encourage the retrofitting of Green/ blue infrastructure into existing towns and villages and encouraged as a key part of the Placemaking of new development.

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

NPF4 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.

NPF4 will need to make infrastructure provision a priority, ensuring that the capacity of existing infrastructure is considered as part of all new development. The planning system 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.

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DELIVERING ELECTRICITY

NPF4 should remove any reference to fossil fuel in terms of improving energy security and at best should only be recognised in terms of maintaining energy security with a view to being phased out during the NPF period to 2050.

A more joined up approach to address any need to expand grid capacity during the application process is important.

Energy storage must become a national priority in order to increase capacity generated by renewable sources. It should be a mandatory requirement for proposals exceeding an agreed threshold and be incorporated early in the design process. Consideration should also be given to exploring opportunities/incentives to retro fit energy storage solutions at existing windfarms.

There should be a more national approach to strategic capacity for new wind farm development to strengthen landscape capacity/ability for large scale wind.

Repowering of existing wind farms will become a key issue. As the principle of wind farm development at a particular location will have been established by the original consent repowering schemes should now be separated from spatial capacity assessments and focus should be on the design of the repowering schemes in cumulative terms with respect to landscape capacity and visual amenity as well as maximising energy capacity.

Large scale biomass has a role to play in offering alternative means of energy generation but should not be considered fully renewable.

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HEAT

Heat capture will be one of the key tools in combatting climate change. A strong robust planning policy stance is required at national level. At the moment there is a lack of clarity of definition and guidance for planners and the development industry as well as a general lack of knowledge and understanding of the different types of technology available and their effect in reducing greenhouse emissions. There is simply no mechanism or expertise within local authorities or the key agencies for assessing energy statement and technical solutions.

NPF4 should set at a national level a statutory requirement for all development of a certain size to include a robust low-carbon, local heat network that is deliverable. Heat targets are set at National Level and therefore NPF4 must give more than a steer on meeting these targets and delivering heat solutions must be implicit at National Policy Level.

The links between waste to energy projects and the development of heat systems should be emphasised and proposals for the former should incorporate measures to facilitate this relationship.

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WASTE

NPF4 should continue to support zero waste and the emergence of new technologies. It should reference case studies from other countries who successfully integrate schemes into the urban fabric in order to outline successful technologies such as thermal waste processing where all PPP licence requirements are met. The planning system must take the lead on supporting the introduction of new technologies at a National Level to give confidence in new technologies at a local level and further strengthen the benefits and need for these new technologies. Consideration can be given to a review of the statutory approval processes to move to a more integrated approach

The opportunity should be taken to strengthen the link between energy to waste proposals being a way to deliver district heating. Energy to waste should be an intrinsic part of any policy on heat. In addition greater public awareness of the benefits of waste to energy schemes is required especially in terms of the perceived health concerns.

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EXTRACTION OF RESOURCES

At a City Region level the proposed Regional Spatial Strategies should include policy on mineral extraction as with the existing development plan system.

Focus should be on non-energy minerals only and further emphasis should be placed on each Local Authority maintaining their own 10 year minimum aggregate land bank to ensure local supply. A requirement to ensure a 10 year national supply would not be appropriate. The landbank should be further split into aggregate type to reflect the need for different aggregate material throughout the construction industry.

Further emphasis should be placed on the benefit of extending existing mines/ quarries rather than the promotion of new sites where possible. Aggregate recycling should be fully promoted and seen as the first preference in terms of mineral sourcing

Non-sterilisation of mineral deposits should not be seen as a minerals policy but should be at the fore front of any development planning principles to ensure protection of local resources.

South Lanarkshire Council has developed good practice in terms of the restoration of sites and has been successful in restoring land following the demise of Scottish Coal. A nationwide approach to site restoration is required.

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PEATLAND

The commercial extraction of peat should no longer be supported in any circumstance and extension to existing peat sites (both in area and extraction periods) should be discouraged at a national level. The carbon capture benefits of peat regardless of having a low conservation value far outweigh any gains from commercial peat extraction and restoration.

The impact of development on existing peatland is an important issue and therefore there should be a presumption against the development of such sites unless it can be demonstrated that mitigation to at least the same extent and quality is available. The re-creation of resources should go in parallel with the extraction of the peat.

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GREEN INFRASTRUCTURE

Green and blue infrastructure has huge potential to contribute to climate change objectives. The multi-functional nature of blue/green infrastructure has to be emphasised in NPF 4, in terms of its contribution to climate change mitigation, biodiversity, outdoor access and recreation, landscape enhancement, water management, education, health and well-being.

The current crisis has emphasised the importance of having good quality greenspace and green networks that are accessible from people's homes. Unfortunately it has also revealed that equal access to quality greenspace is not enjoyed by all and is particularly difficult for those living in flats, tenements and towerblocks in and around urban areas. These disparities will need to be addressed when open space standards are devised, and strong guidance from NPF/SPP would assist in this process. It may be necessary to have stricter controls on loss of greenspace to development in such areas.

There is a need to ensure that blue/green infrastructure is master-planned as a basic component of developments, similar to roads and other infrastructure. There are good examples available of how site layouts can be planned around water management (blue infrastructure) and the amenity and structural greenspace can be associated with this and also link into the wider green network. The current approach of maximise the number of housing units and put some token greenspace round the edges is no longer acceptable and NPF should be taking a strong lead to promote more innovative approaches.

The potential for contributions to offsite green infrastructure and the wider green network also needs to be addressed. There will be situations where there is already sufficient open space available locally, and more on-site provision would be counter-productive. In these cases contributions should be sought either to bring nearby open space up to standard, or to fund wider green network priorities. Open Space Strategies prepared under the new Act will play a key role in identifying opportunities and deficiencies, and applying standards for open space provision (whether set nationally or locally)

The strategic role of the Central Scotland Green Network should continue to be recognised in NPF 4. With the increased targets for new forestry planting, is it time for CSGNT to go back to its roots and look again at creating the central Scotland forest? There have been barriers to successful lowland forestry expansion in the past but if we are to preserve our peat reserves in the uplands (for functions such as flood prevention), areas like central Scotland must play a greater future role in meeting forestry targets. There is also an emerging concept of a Clyde Climate Forest, which may be relevant to refer to in NPF4.

There should be a strong link between the Development Plan and Open Space Strategies – bringing these under the Planning remit in the new Act should help with this. Development Plans should contain policies to set the open space standards for new developments. There is currently no consistency across Scotland with regard to how standards are developed and implemented. There is scope for national guidance on this but it has to be recognised that there will be local variations between urban and rural areas, large settlements and smaller towns and villages, so a one size fits all approach probably won't be appropriate. However strong backup from NPF/SPP will assist planning authorities when they are applying open space standards to new developments.

Provision of good quality green infrastructure is an integral part of placemaking. It should provide the framework within which new development sits. The issue is not really about policies, it is ensuring it is given sufficient weight when allocating developers contributions. If NPF can emphasise that green infrastructure is 'up there' alongside roads and education as a key planning requirement for new developments this would be a positive step, though to implement this would need Open Space Strategies to be in place to quantify what the green infrastructure requirements for an area are.

The functional flood plain should continue to have strong policy protection from development. Recent events have demonstrated that building new homes on flood plains is unwise and this is just going to become worse as climate change intensifies. Protection of flood plains should be a national priority. In addition the role of the

uplands and in particular peatlands in retaining water should be recognised. A strategic catchment level approach to flood management is essential, and NPF is in a good position to identify key priorities.

At local level, flood risk assessments should be essential for major and national developments and for some categories/locations of local development.

On a micro scale there could be encouragement in SPP for developments to incorporate 'rain gardens' into their design. <https://raingardens.info/>

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HEALTH

There are a number of strands to health and well-being that can be particularly influenced by the planning system:

- physical activity;
- food, diet and obesity;
- mental wellbeing;
- Environmental and industrial hazards.

Social wellbeing in terms of access to facilities to prevent isolation is a further key strand that should also be addressed. Facilities accessible should be those that support the health and wellbeing of the community. Existing national and local health strategies and the public health priorities could be complemented in NPF4 by embedding wellbeing within policy advice to ensure there is a strong connection between Planning and Health. This advice should be land use based and monitorable.

NPF4 can ensure that policies on health and wellbeing contribute to the outcomes of improving the health and wellbeing of people living in Scotland and improving equality and eliminating discrimination by advocating for increased consultation with NHS/Public Health Scotland to ensure that the policy approach meets the needs of their main drivers ie

- health protection – safeguard people against environmental and industrial hazards.
- health improvement – ensure there are no barriers to physical activity and that it is accessible for everybody.
- healthcare public health – ensure development in the right places and that no community is left out.

An understanding of what prevents ill health is required to ensure an aligned policy approach that ensures communities are not disadvantaged.

NPF 4 policies can ensure greater and better delivery of health policy objectives in a number of ways;

- Placemaking - embed the six qualities of successful places. Development that delivers on these qualities would in turn deliver on health and wellbeing policy objectives as long as the development is in the right place.
- Active travel – new major trip generating developments should be directed to locations accessible by walking, cycling and public transport. These developments should recognise the needs of cyclists and pedestrians as well as access to public transport routes and hubs and any core paths or Sustrans routes.
- Housing – if poorly located, designed and delivered this land use can have an adverse impact on the environment and people's lives. New development should embed the principles of placemaking and meet active travel needs.
- Green infrastructure – existing infrastructure should be protected and new development should secure the delivery of connected, accessible and well-designed new green infrastructure to reflect the link between positive health outcomes including mental health and the availability of green network and greenspace provision.

- Town centres – evidence would suggest that the marketplace is shifting to services and experiences. At this current time many now service the experience economy and surviving shops focus on beauty, fitness, coffee, charity and loans. Flexibility is required to allow town centres to evolve this may be to allow them to become a destination that draws people to congregate in search of company and enjoyment. This in turn would protect social wellbeing.
- Air quality - development proposals which have the potential to have a detrimental impact on air quality or introduce new relevant human exposure into an area where there is existing poor air quality will not be acceptable unless measures to mitigate the impact of air pollutants can address this impact.

In terms of preparing Development Plans there is a need to establish a clear procedure for consultation and engagement with NHS/Public Health Scotland with a detailed list of considerations to ensure health impacts/needs are properly assessed; quantification of standards to ensure areas of need can be more easily identified; and advice on how to assess the impact of local development plan policy advice on health and wellbeing.

In terms of assessing whether sufficient health care services such as doctors surgeries are available for existing and new communities again meaningful consultation with the NHS/Public Health Scotland is needed to ensure Local Authorities are provided with the information required to assess the potential healthcare needs for new development and to identify existing areas that are already in need of healthcare facilities. This would then ensure that where healthcare facilities are required this can be planned for. There needs to be a way to assess level of need.

South Lanarkshire Council's experience has found obtaining relevant information can at times be difficult. It is clear that the importance of meaningful engagement and consultation with Planning needs to be recognised by the NHS/Public Health Scotland if we want to improve on health and wellbeing outcomes. This in turn allows sufficient detail to be provided in policy advice for developers in terms of the requirements for developer contributions for healthcare.

NPF4 would complement health strategies by allowing the consideration of health criteria when assessing planning applications. Of prime importance NPF4 should support a healthy, safe and accessible (financial and physical access) food retail and catering environment, in particular in the vicinity of schools and in deprived areas. Policies are needed to ensure development does not undermine the health and well-being of communities, including the prevention of over-provision and clustering of hot food outlets. Potentially exclusion zones could be laid out for particularly sensitive areas such as schools. Changes to other legislation may be more appropriate to control lifestyle choices. Ensuring provision of healthy and affordable food in rural or isolated areas could be explored as well as support to retain/attract healthy food businesses in town centres.

Policy could also seek to preserve/develop public or community places and infrastructures for food growing, socializing around food and temporary good food outlets (e.g. farmer markets). Such policies should be delivered in conjunction with other actions (e.g. incentives for businesses to make food healthier, promotion of healthy food in schools)

Mapping provided by the Coal Authority to Local Authorities identifies if a site is within a high or low risk area of former mine working. These areas could be used for the identification of the potential for mine gas and local development plan policy worded accordingly to the risk to ensure an appropriate assessment is carried out by the developer and that it can be mitigated. This in turn would inform development management in their assessment of any planning application.

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NATURAL ENVIRONMENT

The current hierarchy of policy for international, national and locally designated areas and sites is robust and works well. There is existing SNH guidance on how to identify and designate Local Nature Conservation Sites. This is quite long and complicated though and could benefit from being simplified and brought up to date. However, the main issue is not the availability of guidance but the lack of staff resources and expertise to undertake this work and ensure that local sites are included in LDPS. Furthermore, designations are only a small part of the picture. There should be more emphasis on wider biodiversity interests for example habitat networks and it should be made clear that developers need to look beyond the 'red line' – even if there are no designations in the site itself there can be neighbouring interests that could be adversely affected. A basic requirement for an ecological or biodiversity statement for all major and national developments would be a start, and even for smaller developments some basic information should be supplied with the application.

A basic requirement for an ecological or biodiversity statement for all major and national developments would be a start, and even for smaller developments some basic information should be supplied with the application. Where good quality biodiversity assets are identified on a site, regardless of whether or not these are 'designated', efforts should be made to incorporate these into the design, if this means the number of houses is reduced so be it.

It would be difficult to include biodiversity enhancement per se as a developer requirement in terms of contributions. A possible approach is to ensure that any open space or green network provision required for the development has to meet specific standards in relation to biodiversity. English planning policy is moving towards the concept of 'biodiversity net gain' for new developments, this is something that Scottish Government could explore for NPF4.

NPF4 should give a strong endorsement to existing environmental legislation and the policies and guidance from the key agencies SNH, SEPA and HES. This would help to give added weight to these policies and guidance in the consideration of planning proposals. Scotland is developing a good reputation as an environmentally aware nation and recognises the vital importance of a high quality natural environment in terms of quality of life and attractiveness to visitors and investors. It is key that NPF4 has strong protective policies included.

By its nature, all new development involving take up of land (other than brownfield) is going to have an impact on soils. The current approach of protecting the best quality agricultural land and the increasing emphasis on protecting peatland and carbon rich soils should be continued. Current events are likely to mean increasing reliance on the domestic agricultural sector for our future food production. Now is not the time to be relaxing controls on development on prime agricultural land which is a finite and diminishing resource.

It is widely accepted that increasing woodland cover will play an important role in climate change mitigation. The forestry targets set by Scottish Government are ambitious. However it has to be recognised that promotion and control of forestry planting does not come under the remit of the planning system. Planning Authorities are tasked under the new Act to develop forestry and woodland strategies encouraging woodland in appropriate places but ultimately it will be an economic decision where new woodland gets planted.

However it is considered that the NPF has to explicitly recognise the potential conflict between major forestry expansion and the need to protect peatland and carbon rich soils. The proposed wording in the Objective 'having regard to the desirability of protecting peatland' is very weak and does not give adequate recognition of the importance of this resource particularly its role in climate change mitigation. There are alternative locations where new forestry can be promoted. The pilot work being undertaken by Scottish Forestry and the Councils in the South of Scotland (South of Scotland woodland creation initiative) may be a way forward towards identifying genuine 'preferred areas' for forestry expansion. This way, peatland can continue to fulfil its key role as a carbon store, whilst new capacity can be created in less sensitive areas by woodland expansion. Protection of peatland should therefore be a national priority identified in the NPF. If NPF gives this clear message it can be reflected in local authority Forestry and Woodland Strategies and relevant planning policies.

In South Lanarkshire, the main development type which can impact on our key natural environment assets is renewable energy, in particular onshore wind. The Council has been reasonably successful through its planning policies and Spatial Framework for wind energy in accommodating a substantial amount of new development and contributing to national energy targets, whilst still managing to safeguard the natural and historic environment assets of the area. However, the pressure is not abating and turbines are becoming increasingly taller, causing greater environmental impact particularly in terms of landscape. It is important that NPF recognises that every area has a carrying capacity and in some areas this is getting close to the limit. A strategic/national overview is required to ensure that all areas with potential for renewable energy are making a proportionate contribution. With regard to the other development types – rural housing, tourism etc – it is considered that the existing policy framework for the protection of natural resources is robust enough to address these pressures. It is appreciated that elsewhere in Scotland tourism can have a much greater environmental impact and may need stronger policy guidance from NPF/SPP but this does not really apply in South Lanarkshire.

Minerals development can also have a significant impact where mineral resources occur in areas designated for natural heritage. For this reason the Council strongly favours a criteria based approach to minerals planning so that full consideration can be given to environmental impacts and each case can be judged on its merits.

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PLACEMAKING

The current approach is too focused on design rather than the outcomes that we are trying to achieve in terms of supporting communities. In general terms it is rare for planning applications to be refused on the basis of poor design and the current SPP does not provide the clarity that would be necessary to do so.

Placemaking should be about communities and how a place functions for people and how the location serves them. There are also difficulties around how success should be measured. The danger is that the expectations of communities are not managed effectively and are left with a poor impression of the planning system when aspirations are not delivered. Policy also needs to consider existing communities and how we can support them and how to make placemaking tangible. The current policy is more appropriate for new development.

Equity is important, so it is misleading to focus in specific groups in the objectives (like older or disabled people, for example).

Planning has a tendency to be reactive. To address placemaking and support communities a different bottom up approach may be appropriate. This could be achieved through the role that Local Place Plans are intended to have). On that basis clear guidance on their role needs to be developed.

When considering design, design panels may be beneficial and guidance on this is supported.

NPF4 should be more prescriptive in the language used relating to design. Greater clarity of language is necessary to strengthen LDPs and development management follow-through. Generally NPF seek to ensure that placemaking principles are carried through to development management and pressure to deliver new development should not compromise the ability to deliver high quality design. Local context should be considered to ensure new developments respond appropriately to the surrounding area.

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RURAL DEVELOPMENT

It is important NPF4 recognises and distinguishes between different types of rural area to ensure a place based approach to planning. The classification of rural areas could be improved by being evidence based utilising demographics, socio-economic and deprivation statistics to consider needs, challenges, assets and opportunities of each area. The classification and better understanding of these areas can then be used to establish place-specific policies which would provide appropriate support and guidance of development for each of the rural areas.

National planning policy should provide guidance on the basis for characterisation of rural Scotland and how local authorities should adapt that for their local area. This in turn would allow local authorities to determine where the population requires to be increased, where there are specific housing needs or what kind of support the rural economy requires.

Rural housing policies should also reflect the needs, challenges, assets and opportunities of each location. National policy should support local authorities to have more prescriptive policies on the type of housing provided to ensure meets what the local population needs and supports the rural economy. Greater clarity on the provision of affordable housing is suggested. The transition towards a home based/remote working environment should be addressed to reflect changing economic circumstances. Policy also needs to ensure infrastructure and services especially digital connectivity is provided.

Although tourist accommodation within this area is predominantly short term stays as opposed to a destination location for stays over a longer period of time the short term letting sector is not a notable issue within South Lanarkshire. We do not have an issue of unbalanced tourism. In view of this it is not considered that tourism accommodation adversely displaces rural housing provision. Contrary to this there is evidence of tourism accommodation proposals being used to secure the approval of residential accommodation within the rural area where otherwise a house would not be acceptable. In summary where the short term letting sector causes detriment, this may be an area specific issue that would be better addressed through LDP's with a strong support from the NPF4 to address the issue where it exists.

NPF4 could allow flexibility to utilise the landscape to provide increased opportunities for outdoor recreation where there is not a high level protection of landscape in particular where such areas are within remote countryside and could create spin off benefits to support local fragile communities. NPF4 should encourage the multiuse of windfarm land to connect with outdoor opportunities such as walkways and tourism centres focusing on wildlife and outdoor experiences. It could also focus on promoting packaged experiences which would encourage visitors to stay longer within the area, and support a wider spread of facilities. This could connect green networks, leisure and outdoor recreation, and public art.

The tourism draw from Glasgow and Edinburgh supports day visits to well established tourist facilities within South Lanarkshire. It does not provide a wider benefit to more fragile communities. Developing a destination image to encourage longer more diverse visitor stays requires the NPF4 to give appropriate hooks and give flexibility within LDP's to respond to local circumstances. In doing so the NPF4 should enable LDP's to create potential visitor development areas, which are guided by local need and viable opportunities.

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SUPPORTING BUSINESS AND EMPLOYMENT

Currently there is too much emphasis on the Key Sectors. The recent research by Ryden for Scottish Futures Trust indicates that only 28% of Scottish employment is in the key sectors. Overall, inclusive growth is therefore more likely to arise in the non key sectors. There is still a role for NPF but national policy should be clearer about the locational requirements of the key sectors and if necessary identify key sites/locations to be safeguarded by the planning system.

The new NPF is an opportunity to ensure that City Deal and Regional Economic Partnerships are properly integrated with the development planning system. NPF should not 'take account' of City Deal, it should be driving the process and providing a strategic land use planning context for the individual project level developments. National infrastructure priorities should be identified in the NPF and then articulated in Regional Spatial Strategies and LDPs then delivered through City Deal.

South Lanarkshire does not currently have any Enterprise Areas. Should national policy change, and different priorities for the Enterprise Areas result, there may be potential in South Lanarkshire for Enterprise Areas based on the distribution sector, given the excellent motorway connections in the area. Current events have highlighted the vital role of the distribution sector which may increase its priority in national policy.

There needs to be more recognition that most of the employment in Scotland is not in the key sectors. To minimise travel and to ensure there are job opportunities close to disadvantaged areas there may be a need to adopt a more flexible approach to location of employment generating developments, which are compatible with residential amenity. It may also be appropriate to be more rigorous in protecting local employment areas from more economically lucrative uses such as private housing, particularly in smaller settlements where there are no alternative sites for industrial/business use.

For new major developments ensure that these are in the right locations and are properly masterplanned. Clyde Gateway Shawfield is a good example of what can be achieved in an urban area involving reclamation of derelict land to create a range of development opportunities within a very high spec hard/soft landscape setting/public realm. The costs to achieve this standard of development however would be high and public sector intervention is probably required upfront. The key is forward planning and ensuring that the masterplan or brief is adhered to. This is possibly easier with large scale industrial/commercial developments than with new residential developments, where placemaking always seems to take second place to profit making. For more local ad hoc developments, there are fewer opportunities for place making. Maybe we just have to accept that local employment areas serve a specific economic function and the best we can do is ensure that the amenity of neighbouring areas is not adversely affected by ensuring there is adequate landscape buffer zones.

In terms of affecting climate change homeworking can be dealt with through Development Management policies. South Lanarkshire Council Local Development Plan 2 has a policy which addresses this. It is important to ensure that home working does not have any detrimental effects on the residential amenity of neighbouring properties therefore having a threshold for when this becomes a material change of use would remain relevant.

All new major and national development proposals should have energy efficiency and waste management plans as part of their submission. The energy efficiency plan would probably come under the Energy Statement as currently required by SEPA.

It is widely acknowledged that need and demand analysis is a key gap in our understanding of the land use requirements for industry and business. We have a very good handle on supply and distribution of land but no consistent data on demand. Past practice has been to estimate future demand based on past take up rates to give a figure of years of industrial/business land supply remaining in each Council area. This is a very crude measure and can easily be skewed if a very large development takes place one year. The current SPP states that allocation of land for industry and business should take account of current market demand but gives no guidance on how this should be undertaken. The recent research by Ryden for Scottish Futures Trust indicated that this was an issue across Scotland. There needs to be a stronger policy in NPF 4/SPP to address this and clear guidance given to planning authorities. There could be a role here for the Regional Spatial Strategy and Regional Economic strategy working together to provide a strategic position as clearly it is a cross boundary issue. Clydeplan has been looking at this for a number of years but there is still a lot of inconsistency in how individual Councils approach this matter.

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VACANT AND DERELICT LAND

Planning policy since the 1980's has consistently recognised the blighting effect of vacant and derelict land and has supported the development of brownfield land. Policy is not the real barrier to development, it is issues like ownership, site treatment costs, contamination etc that seem to prevent delivery. Brownfield only becomes attractive to developers when the supply of easier to develop greenfield sites is restricted by strong planning policies. However in recent years Governments have been persuaded by the housebuilders that continual greenfield release is essential to maintain economic growth. The most effective thing NPF could do to promote brownfield development is to keep a strong greenbelt policy and restrict greenfield release. Parallel with this other Scottish Government initiatives such as the derelict land task force must continue to identify ways of removing the real and perceived barriers to development of brownfield sites. The performance of the Derelict Land Fund needs to be reviewed to see if it is being focussed on the right sites. The restrictions of the current DLF mean that only a limited number of authorities benefit from it and sites are generally limited to those in public ownership. The huge potential of Vacant and Derelict Land in Scotland to contribute to wider agendas such as green network, forestry expansion climate change offsetting and mitigation and flood prevention needs to be recognised in NPF4.

If NPF4 moves away from just having physical projects as national priorities to a more thematic approach, then vacant and derelict land could be included as a national priority.

More emphasis could be placed on examples of successful re-use of VLD: from large scale public investments such as Shawfield Business Park in Clyde Gateway, to high quality local housing and mixed use developments on long term VDL sites (Eg Uddingston gasworks)

For Development Plans developers can already challenge designations of land for particular use in the LDP. If a landowner thinks their land is uneconomic to develop they could object to its designation. Any new sites released in LDPs are supposed to be viable, so the days of LDPs allocating massive sites that cannot be developed should be over. In relation to DM it is often Developers who promote sites which realistically will never be developed so maybe the onus should be on them to demonstrate that their sites are viable, rather than the other way round. At the moment it would be difficult to refuse planning consent solely on the grounds that a site is not considered viable – maybe NPF4/SPP needs to look at this?

If the question is more in relation to developers promoting greenfield sites having to prove that there are no viable brownfield sites in the area this would be difficult as in many cases site investigations would be needed before it could be determined that the brownfield site was undevelopable.

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TOWN CENTRES

As with other topics the current economic situation will inevitably mean town centres will be very different places to that which they were even at the start of the Covid-19. As we know there have been considerable challenges around town centres for some time and the shutdown of most businesses for this prolonged period will only make the situation more acute. Retailers in particular have struggled to address the challenges and we are likely to see very different high streets.

The crisis will cause irreparable damage to many commercial centres and there will be a need to reassess how we use our towns and what role and function they provide communities. However the crisis gives an opportunity for town centres and their businesses to connect with the communities they serve, capitalise on this sense of community and reposition themselves as the country emerges the current situation. It is unlikely that the bigger centres will be attractive to many in the short term and therefore if town centres can be ready and willing to offer local services to local people even in the short term they could find a renewed role and function. The planning system needs to be alert to the possibility of communities wanting to be more active in a variety of ways and the potential for community led town centre projects. In the longer term greater clarity and guidance on health checks is required.