

North Lanarkshire Council NPF4 Early Engagement Response

Introductory comments on altered perspectives

Since the opening of the consultation, circumstances affecting and affected by the Planning system have changed both in terms of service delivery of Development Management and the context for Development Planning and the policies, guidance, advice and regulations we will have to develop and deploy to support societal recovery from the disruption caused by the COVID-19 crisis, while balancing economic recovery and climate change drivers.

Clearly the future shape of the economy, economic and development activity and changes in patterns of the full range of inequalities, land use, transport and recreation & leisure will be affected by the COVID-19 crisis and response in ways that are difficult to predict and quantify as we move through the recovery and renewal phases.

Expectations of our homes, our places and spaces and the connections between them will be fundamentally changed by our experience of the COVID crisis.

Expectations of our places for business and industry, places where we congregate, our town centres and tourism, leisure and recreation locations will also be altered in ways that are going to lead to the requirement for a complex and holistic response.

The imperative for integrated and focussed investment in physical, economic and societal infrastructure will be stronger. The location, function and accessibility of business, industrial and commercial centres and places where we spend our leisure time will require to be considered further. The balance between residents, second homes and tourism accommodation and the whole range of supporting physical, economic and societal infrastructure will need to be investigated particularly in our key tourism economy centres and rural areas.

The size (floor space and number of rooms), location, affordability and possibly tenure of homes will change the framework for the discussions on land for housing. Capacity to support IT and the provision and size of private garden ground will come under scrutiny as a result not only of home working but also shielding and the limitations on movement and new expectations around the availability and use of space.

The balance between and function of truly public spaces, shared private spaces (flatted developments) and private gardens may alter. The expectations on the use, function, design and accessibility of our open spaces will fundamentally change. Similarly the standards expected of footpaths and footways may change to reflect altered patterns of usage by cyclists and pedestrians both in response to the current situation and developing policy on climate change and modal shift.

Actions already taken to re-define our response to existing challenges in North Lanarkshire and to refocus activity through The Plan for North Lanarkshire should place us well for tackling these issues. However the Government, through NPF4 and SPP, has a crucial role in reframing conversations around the issues explored above, providing strong leadership and guidance and, where required, clarity on of the type of supporting evidence will be required when Planning Authorities seek to justify deviation from national guidance and policy.

The Plan for North Lanarkshire

The Plan for North Lanarkshire, approved in February 2019, is a place based strategy outlining a clear future direction for North Lanarkshire, in terms of inclusive growth and prosperity for all, and making North Lanarkshire the place to Live, Learn, Work, Invest, and Visit.

The Plan recognises the recent successes in North Lanarkshire in terms of economic growth, inward investment, population growth, and rising employment, while recognising there are still considerable challenges to overcome. This includes unacceptably high levels of deprivation and child poverty, in work poverty, and clear areas of inequity and inequality across communities.

To realise the delivery of The Plan, a Programme of Work (approved in March 2019) was instrumental in bringing together a number of elements to support all strategic planning, development, and enterprise activities in a cohesive manner, all working towards a shared ambition of realising significant and sustainable economic, social, and environmental benefits for North Lanarkshire's towns, communities, homes, and individuals.

By focusing on a programme of place based investment - integrating planning, aligning infrastructure, and targeting entire communities – the Plan aims to address the range of different and complex economic, social, and health issues that exist at a local level, and achieve change that is sustainable in the longer-term. Consolidating investment and directing development towards town centres and communities, the Plan aims to reverse the decline of the high street, create vibrant mixed use centres, offer choices in housing and employment, make attractive well connected neighbourhoods, and foster distinctive communities with a strong sense of place in order to revitalise struggling areas and further grow the local economy for all.

The Council and its partners are taking an integrated approach to guide implementation of the investment programme and ensure more integrated and accessible services and service systems, while building more engaged, connected, and resilient communities. The accompanying operating model will be built around co-production; realigning relationships between the council, services, partners, service providers, private sector, third sector, and residents with a focus on whole system approaches and shared infrastructure and responsibilities.

It is clear that this overarching and holistic operational response to existing challenges fits well with the themes explored in the Early Engagement consultation on NPF4, the questions posed as part of it, as well as the new challenge to be met in the recovery and renewal response to the COVID crisis.

Regional Planning Perspective

North Lanarkshire Council is clear in its support for planning at a regional level within the Scottish planning system. The drivers and outcomes of regional working are understood and the structures in place within the Glasgow and the Clyde Valley City Region are well developed, strong, and adaptable and have longevity, which has allowed shared learning and approaches to the benefit of constituent Authorities, the City Region and Scotland.

North Lanarkshire Council was therefore a participant and contributor in the consideration and development of the Clydeplan response. North Lanarkshire Council in making this submission endorses the submissions of the Independent Report of Clydeplan Topic Groups Joint Workshop and the Indicative Regional Spatial Strategy made by Clydeplan on behalf of the Glasgow and the Clyde Valley Regional Planning Authority member authorities.

Comments made in this submission on behalf of North Lanarkshire Council can be read as complementary and additional to Clydeplan comments

Consultation Questions

In relation to the 5 questions posed in the consultation North Lanarkshire Council considers that each is closely inter-related and the responses to each question should read as such along with our introductory comments

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

The cost of climate change is expected to increase and, as time passes, mitigation measures will become increasingly complex and expensive to implement. A key driver must be work to fundamentally reduce carbon emissions, source renewable energies and create the infrastructure to support these initiatives.

In many cases there will be increased development costs associated with the adoption of new standards and technologies to mitigate and adapt to climate change, particularly in urban authorities seeking to fully utilise brownfield land. Considering that these developments form part of a climate resilient infrastructure the additional costs and funding to meet them should be reflected in the National Infrastructure Plan and associated investment strategies.

Mitigation of the effects of climate change

Clear direction on which renewable technologies and sources will be supported through national infrastructure investment. This should not close off private investment in other alternatives but we must show a lead so that transport providers, developers and the public can make their own investment decisions in technologies and networks in the knowledge and comfort that they are the ones supported by central government policy, regulation and investment.

A stronger system in terms of where growth is encouraged or directed (compact city model for the city regions) should aid in these efforts and support the response to other questions in this consultation around place, quality of life, health and well-being and development and investment in our economy. A much stronger commitment to the reuse of brownfield and or vacant and derelict land, and acknowledgement that this is often at an increased development cost, is needed to protect scarce resources.

The density, layout, design and materials used in development and the connections between our places and spaces will require much deeper consideration both in terms of our response to the climate emergency but also to any emerging change in expectations as a result of societal change in response to the COVID crisis.

Frameworks for a range of nationally and regionally important responses would support integration and efficiency. These should include

- Renewable energy production
- Energy distribution
- Waste treatment and associated energy recovery
- Green networks and blueprints using the GCVGNP model to identify opportunities to enhance and create integrated networks of access and habitats
- Integrated mode hierarchy networks to encourage modal shift including e-bike network support

Adaptation to the effects of climate change

Frameworks and design guidance should be integrated with associated national initiatives, key agency plans and other legislation to provide a holistic approach to the planning and design of new development for a warmer but wetter climate.

National Developments or large scale infrastructure projects and investment should be assessed in relation to adaptation in their design. A set of design principles should be set out to ensure the regional or local development they directly support or subsequently facilitate also contribute to adaptation to climate change.

Sites and buildings will have to be designed to incorporate technology to protect them from increased rainfall and higher temperatures. This will require the

- The reduction of flood risk by avoiding identified areas of risk and use of alleviation methods upstream to protect otherwise undevelopable land or the use of landform and design to protect areas which will be affected by rising sea levels
- Site design should include natural methods, such as
 - management of surface water on site
 - green infrastructure and also
 - The installation of zero carbon technologies to manage the climate inside buildings.

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

Focusing on a programme of place based investment - integrating planning, aligning infrastructure, and targeting entire communities will address the range of different and complex economic, social, and health issues that exist at a local level, and achieve change that is sustainable in the longer-term. The vision from NPF3 is still valid in this regard, however, NPF4 and SPP need to take account of the new 'normal', the new priority on developing a truly holistic approach to wellbeing and the rebalancing of economic imperative with health and wellbeing in quality of life. Comments in the introduction to this response and on the other questions in the consultation expand on the factors involved on this holistic approach.

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

As discussed in the introduction the response, recovery and renewal phases of the approach to restarting the economy will have to reflect changed expectations around the location of workplaces and working practices which may lead to a new development geography and new requirements for buildings... Legislation, policy and guidance will have to reflect these changes and facilitate, support and where necessary direct development.

Right amount of land in the right, possibly new or different, places with the right infrastructure, as described in comments on question 5, will now take on added significance.

There is good evidence that the regeneration of vacant and derelict land has beneficial effects on the health and wellbeing of adjacent populations. There are also compelling economic and environmental benefits from the re-use of this land, therefore stronger support and funding for the redevelopment of Vacant and Derelict urban land for a range of beneficial uses will be required.

Planning must also consider and enable a desire or requirement for increased home working or agile working as part of the future development and investment requirement to support our economy. This may require a reconsideration of the size of houses and layout of residential developments as people seek additional space to work from home.

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

As explored in the introduction NPF4 and SPP will have to reflect changed expectations about our places, spaces and the connections between them. These expectations will have to be explored further, possibly through further consultation and legislation, policy and guidance facilitate this change while protecting and enhancing places which have special character or are able to meet these changed expectations.

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

The outputs of the Infrastructure Commission will form an important part of future planning for infrastructure particularly in directing support and investment on a range of infrastructure designed to support our economy, our new geography of places and spaces and the connections between them with increased focus on unlocking the potential our urban vacant and derelict land sites and our town centres.

NPF4 and SPP will have vital role in setting policy and guidance on achieving these outcomes and getting the base infrastructure ready for industry 4.0 and the increasing use of digital technology to work from, run and monitor our homes. In addition we must repurpose infrastructure networks outlined below to support our response to the climate challenge.

- Energy & renewables
- Societal (public and health services and related private complimentary alternatives)
- Multi-modal Transport networks and nodes
- Green networks (access and habitat)
- Utilities
 - Water
 - Sewerage
 - Electricity
 - Gas
 - Digital