

Policy 30: Vacant and derelict land**Q48: Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?**

We welcome and supports this updated and pro-active policy. The re-use of vacant and derelict sites is critical if the aims and aspirations of the Draft NP4 are to be achieved and will enable more Greenfield land to be protected. It may also act to protect land on the urban fringe through Policy 29.

Due to the importance of prioritising brownfield and vacant sites this policy deserves to have a higher recognition within the Draft NPF4 and elevated earlier in the document.

Policy would benefit from the inclusion of links to other relevant considerations in the plan for e.g., the link between the promotion of re-use of derelict buildings and the Infrastructure Hierarchy referenced in '*Policy 8 Infrastructure First*'.

The policy may act to incentivise development of brownfield land while policy 30 (d) safe guards against unviable applications. Where brownfield land is contaminated, there are often substantial financial and technical challenges to overcome which require a degree of flexibility and ingenuity to overcome these. There are a number of other NPF4's polices which combine to contribute to the productive re-use of brownfield land.

Policy could go further and require vacant and derelict land without live current planning consent to be temporarily greened? This would help with the aim to accelerate urban greening and assist with short–medium term biodiversity and green network aims.

30a - LDP will not seek to 'reuse' vacant and derelict land - it will allocate or identify such sites.

30b – not all vacant and derelict sites are in sustainable locations so the support in principle should be caveated.

30c – while we support the principle that green field sites should not be supported this concept is addressed elsewhere and is not required to be repeated for this policy.

30e - policy should also recognise suitability based upon local character etc. Justification for demolition should be supported by a structural survey that identifies that refurbishment of an existing building to tolerable standards is not achievable.

The policy needs to have a strong focus on delivery and financial mechanisms to be successful.

Policy 31: Rural places**Q49: Do you agree that this policy will ensure that rural places can be vibrant and sustainable?**

We support the aim that rural places should be vibrant and sustainable locations.

There is no mention of digital connectivity which is a significant omission.

31c- clarity on what '*a small site that would not normally be used for housing*' means. 20-minute neighbourhood concept may not translate to rural areas successfully as referenced in earlier comments.

The same issue remains with retirement homes as for 'Policy 29 Urban Edges and the Greenbelt'.

Policy 32: Natural places

Q50: Do you agree that this policy will protect and restore natural places?

We are generally supportive of the aims of this policy. However, the policy should link to the nature crisis key principle. LDPs should 'identify, protect *and enhance* locally, regionally.....'.

There is no mention of biodiversity net gain or targets which is a significant omission.

32a – new terms introduced such as '*nature rich areas*' and '*nature networks*' – would have been better to use green networks as this is terminology is used throughout the Draft NPF4.

32b – This is a key policy that supports nature crisis key principle but is hidden near the end of the document. It should have been given greater prominence.

32c – include reference to relevant tests and legislation. Text needs to be clearer.

32e – 1st sentence add the word significant before '*adverse effect*'. Provide link to 'relevant statutory tests'.

32g – '*ecological appraisal*' will be required. This appraisal should identify measures adequate to mitigate any impacts that are identified.

32f – provide link to legislation on non-native species. Text needs to be clearer.

Policy 33: Peat and carbon rich soils

Q51: Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

The expansion of the policy detail on soils is welcomed. Peatland and carbon rich soils can play a key role in the achievement of net zero by 2045 through carbon sequestration and storage. This topic has been relatively low key in planning decisions not associated with wind energy development. This is an area of specialised expertise and may require planning authority staff to acquire new skills and knowledge.

The policy does not mention the damaging impact tree planting can have on peat. Is the expectation that this is identified in Planning Authorities woodland strategies? Clarification is required.

Policy 34: Trees, woodland and forestry

Q52: Do you agree that this policy will expand woodland cover and protect existing woodland?

The expanded policy on trees and woodlands is welcomed. The shift from '*should be protected from adverse impact*' in SPP to the NPF4 policy: '*Development proposals should not be supported where they would result in... adverse impacts*' makes the policy stronger.

The expansion of the Policy to include Policy 34 e which recognises the wider benefits of woodlands is welcomed. In addition to the Woodland Strategies to be prepared by each

planning authority, there is an existing Clyde Plan woodland strategy. The RSS can continue to play an important role identifying opportunities and region wide networks across the Glasgow City region. The policy could also benefit reference the Scottish Government's woodland planting targets.

Policy 35: Coasts

Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?

No specific comment

Part 4 – Delivering our Spatial Strategy

Q54: Do you agree with our proposed priorities for the delivery of the spatial strategy?

Q55: Do you have any other comments on the delivery of the spatial strategy?

Critical to the success of NPF4 will be its delivery and implementation. It is disappointing that the delivery programme outlined in part 4 has not been prepared alongside the Draft NPF4. Whilst we appreciate that a lot of detail will come with LDP guidance and regulations, at least headline information on how an infrastructure approach will be achieved should be contained in the NPF document itself.

It is crucial to the success of Scotland's planning system and NPF4 that Planning Authorities are properly resourced. Delivery of the strategy will require collaborative partnership working with a range of organisations and stakeholders who will assist with professional knowledge on needs, future provision etc, finance and provision of infrastructure. The alignment of resources, plans, strategies and funding over the short, medium and long term is critical. The Draft NPF4 introduces many areas requiring particular specialist skills and areas of expertise which will require additional resourcing and funding for reskilling and upskilling of Local Authority Planners, elected members and external consultancy assistance.

Annex A – NPF4 Outcomes statement

Q56: Do you agree that the development measures identified will contribute to each of the outcomes identified in Section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

Yes. No further response required.

Annex B – Housing numbers

Q57: Do you agree with the Minimum All-Tenure Housing Land Requirement (MATHLR) numbers identified above?

Response set out under Policy 9.

Annex C – Glossary of definitions

Q58: Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

Affordable home/affordable housing – we support the definition and reference to ‘high quality’ affordable homes. It’s not acceptable for there to be a disparity, when referring to quality, between those homes referred to in Policy 9 and the requirements for affordable homes. Both should be required to be of a high quality. Also, we note the change from modest to low incomes in this new definition. Does this mean affordable housing is then only to be aimed at those on lower quartile incomes? We would suggest changing this back to modest incomes so that we have the flexibility to address a range of affordable housing needs, for those on varying levels of income (lower to median), across different tenures.

Enabling development – suggest there should be reference in the definition to this needing to be the minimum necessary to secure its restoration, adaptation and long-term future.

As aforementioned the glossary should include a definition for:

- Community Wealth Building
- Design Led Approach
- Green Economy
- Just Transition
- Land assembly
- Lifecycle greenhouse gas emissions
- Local centres
- Local Place Plan
- MATHLR
- Nature based solutions
- Neighbourhood shopping
- Planning obligation
- Place Based Approach
- Regional Spatial Strategy
- Urban and Rural Synergy
- Wellbeing Economy