

**Indicative Regional Spatial Strategy: Scottish Government Feedback**

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**1.0 EXECUTIVE SUMMARY**

- 1.1 The Planning (Scotland) Act 2019 introduced a requirement for planning authorities to prepare Regional Spatial Strategies (RSS). Details of this process, and the request by Scottish Government for Indicative RSS (iRSS) were explained in a report to September 2020 PPSL [INDICATIVE REGIONAL SPATIAL STRATEGY PDF 348 KB \(argyll-bute.gov.uk\)](#).
- 1.2 PPSL approved the Argyll and Bute iRSS in September of 2020 and it was subsequently submitted to Scottish Government. [Draft FULL Indicative RSS v7 , item 6. PDF 7 MB \(argyll-bute.gov.uk\)](#)
- 1.3 The iRSS content provides a strategic level input from Argyll and Bute into the NPF4 process. Scottish Government has now provided feedback on all Council's iRSS and invited any further amendments by April 2021. The feedback provided by Scottish Government is collective in that it covers all Councils at once. The feedback is included at Appendix 1
- 1.4 The Scottish Government feedback received in respect of Argyll and Bute's iRSS is generally positive and encouraging in terms of the potential recognition of Argyll and Bute within the forthcoming NPF4. Officers do not consider it is necessary or advantageous to further amend the iRSS at this stage.

**2.0 RECOMMENDATIONS**

- 2.1 It is recommended that Members note the content of the Scottish Government Feedback and agree that the RSS is not further amended at this stage.

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### 3.0 INTRODUCTION

- 3.1 Indicative Regional Spatial Strategies (iRSS) were requested from Planning Authorities by the Scottish Government in September 2020 in order to inform the preparation of National Planning Framework 4 (NPF4). PPSL approved the Argyll and Bute iRSS in September of 2020 and it was subsequently submitted to Scottish Government. [Draft FULL Indicative RSS v7 , item 6. PDF 7 MB \(argyll-bute.gov.uk\)](#)
- 3.2 The iRSS content provides a strategic level input from Argyll and Bute into the NPF4 process. Scottish Government has now provided feedback on all Council's iRSS and invited any further amendments by April 2021. Scottish Government will then use these documents to draft the NPF4 due to be published in September 2021.
- 3.3 The feedback received in respect of Argyll and Bute's iRSS is generally positive, and officers do not consider it is necessary or advantageous to further amend the iRSS at this stage.

### 4.0 RECOMMENDATIONS

- 4.1 It is recommended that Members note the content of the Scottish Government Feedback and agree that the iRSS is not further amended at this stage.

### 5.0 DETAIL

- 5.1 The Planning (Scotland) Act 2019 introduced a requirement for planning authorities to prepare Regional Spatial Strategies (RSS). Details of this process, and the request by Scottish Government for Indicative RSS (iRSS) were

explained in a report to September 2020 PPSL [INDICATIVE REGIONAL SPATIAL STRATEGY PDF 348 KB \(argyll-bute.gov.uk\)](#).

- 5.2 Following the September 2020 PPSL, the Argyll and Bute iRSS was submitted to Scottish Government in order to help inform development of the National Planning Framework 4.
- 5.3 The iRSS does not have the status of a formally prepared RSS and was submitted to the Scottish Government without prejudice to further comments Argyll and Bute may wish to make throughout the NPF4 process. However, the iRSS provided a reasonable approach for the planning authorities to submit their existing strategic spatial and infrastructure priorities for consideration by the Scottish Government in the NPF4 process in view of the absence of formal RSS and the timeframe of NPF4 production.
- 5.4 Whilst the Scottish Government continues to work on preparation of the NPF4 which is due in draft in September 2021, it has provided feedback on the content of all Council's iRSS and offered the opportunity for further refinement of the iRSS by the end of April 2021. This is part of the Scottish Government strategy of ongoing engagement throughout the NPF4 production process.
- 5.5 The feedback provided by Scottish Government is collective in that it covers all Councils at once. It analyses the content and process of producing the iRSS, how the strategies have been set out, and the collective appropriateness of their content. The feedback is included at Appendix 1
- 5.6 Key points noted by Scottish Government with which the A&B iRSS already aligns include:
  - 1 The ABC iRSS has shown where strategic development is required and includes tables showing the outcomes to which strategic development will contribute, priorities for delivery and proposed locations in form of a map and diagram
  - 2 The projects included in the iRSS align with those in the ABC Rural Growth Deal projects. These have also taken other key policy drivers into account, such as the second Strategic Transport Projects Review (STPR2).
  - 3 NPF4 considerations such as national outcomes and the main themes are shown in the iRSS tables.
  - 4 The ABC iRSS has a longer timeframe and distinguishes between short term commitments and longer term 'aspirations'. The evidence base to support the iRSS comes directly from the Proposed Local Development Plan 2 evidence base. Delivery bodies / agencies have been identified where known.
  - 5 It is considered that a balance and integration has been achieved between strategy and projects
  - 6 Spatial alignment with neighbouring iRSS areas has been indicated both in the strategy and on the diagrams.

7 We have endeavoured to achieve a consistency of approach through collaboration in the Northern Authorities Development Plan Forum and workshops with the Scottish Government.

5.7 Generally it is clear that Scottish Government has absorbed the contents of the Argyll and Bute iRSS, and particularly has noted our spatial strategy of Growth Corridors; the Western Seaboard; Strategic Employment Sites; focus on regeneration in Remote Rural Areas, and our focus on Tourism. Feedback referring to Argyll and Bute is very favourable, with almost all the content of the iRSS being represented within the National “mashup” constructed by Scottish Government. This contrasts with relatively infrequent Argyll and Bute references in previous NPFs.

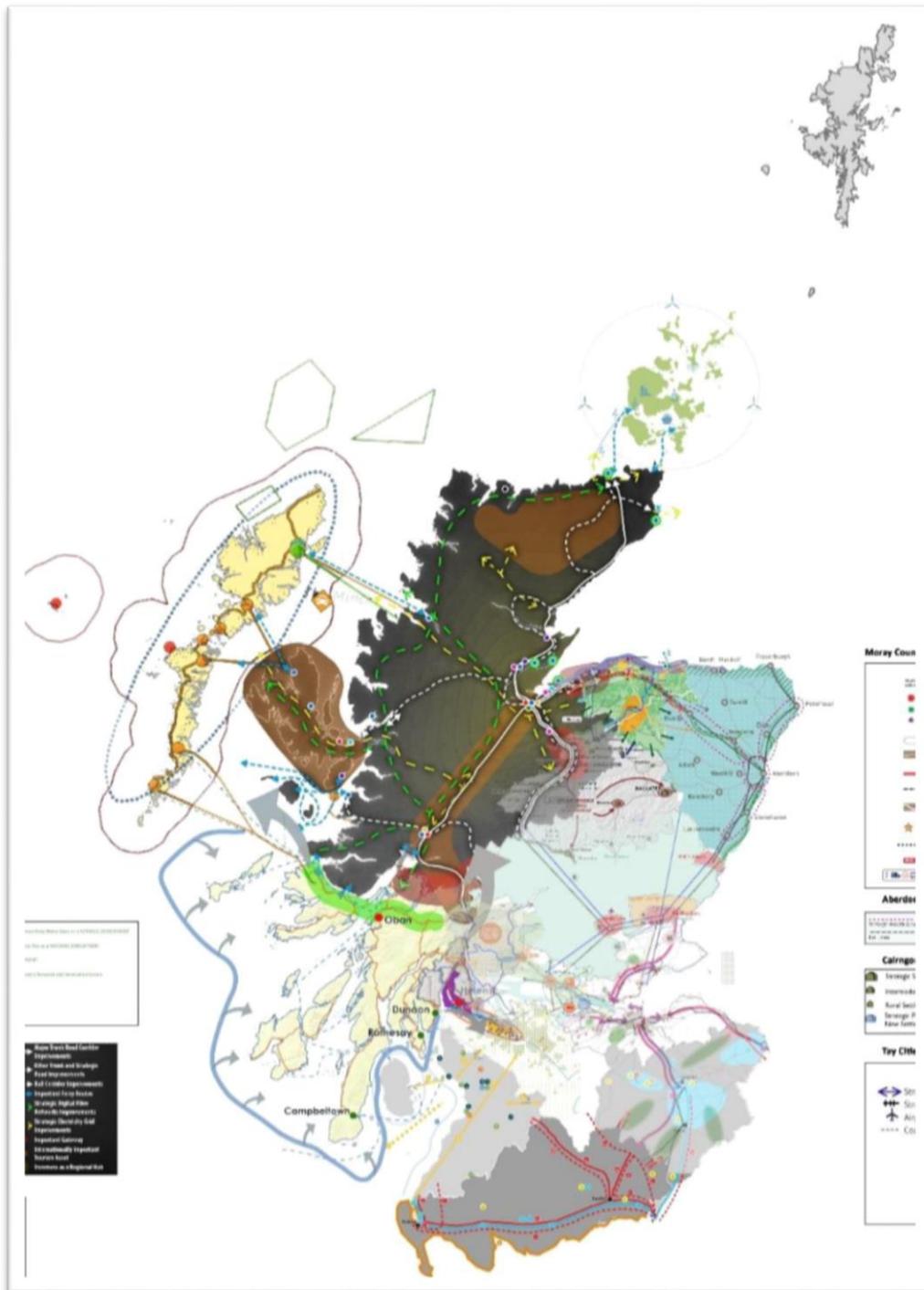


Fig 1: Scottish Govt. “mashup” of All Local Authority iRSS Spatial Diagrams.

- 5.8 Officer’s view is that the Scottish Government are seeking to promote some harmony between the content and style of iRSS and to ensure that they articulate alignment with other plans, projects and policies so that they can be more readily translated into a National Spatial Plan.
- 5.9 However the analysis offered by Scottish Government would seem to suggest that the Argyll and Bute iRSS has generally reflected what is required in terms of

balance between graphical spatial strategy and identification of individual projects, and reliance and alignment with existing evidence based plans and policies.

- 5.10 As a result officers do not see merit in further refinement of our already submitted iRSS, but merely minor officer commentary to clarify certain points or mapping, including; clearer mention of Cruachan Dam; and to correct the labelling of our Strategic Economic Investment Sites on the Scottish Government mapping.
- 5.11 Going forwards Scottish Government will continue to engage in the creation of a national spatial strategy, and the Council will get chance to make comments on the draft NPF4 when it is produced in the autumn of 2021. In 2022, depending on the timing of regulations, the Council will also need to go through the process of producing a full Regional Spatial Strategy, but until the relevant new regulations are produced we do not know the details or timing of that process.

## **6.0 CONCLUSION**

- 6.1 The Scottish Government feedback received in respect of Argyll and Bute's iRSS is generally positive and encouraging in terms of the potential recognition of Argyll and Bute within the forthcoming NPF4. Officers do not consider it is necessary or advantageous to further amend the iRSS at this stage.

## **7.0 IMPLICATIONS**

- 7.1 Policy : The iRSS does not have the status of a statutory RSS. However, it will help inform the NPF4 process which will result in policy implications for the Council. The iRSS reflects current spatial priorities as agreed through engagement and Council process.
- 7.2 Financial : None as a result of this paper. The iRSS has been prepared within Development Policy. However, the iRSS will inform the preparation of NPF4 which will indicate national priorities for strategic infrastructure and development investment.
- 7.3 Legal : None. There is no statutory requirement to prepare the iRSS prior to the regulations. The iRSS has no statutory planning status.
- 7.4 HR : None
- 7.5 Fairer Scotland Duty: (please refer to guidance on Hub): The iRSS is based on Proposed Local Development Plan 2 which has taken account of the Fairer Scotland Duty Act
  - 7.5.1 Equalities - protected characteristics: The iRSS is based on Proposed Local Development Plan 2 which has taken account of equalities – protected characteristics
  - 7.5.2 Socio-economic Duty: The iRSS is based on Proposed Local Development Plan 2 which has taken account of socio-economic duty

- 7.5.3 Islands: The iRSS is based on Proposed Local Development Plan 2 which has taken account of Island issues.
- 7.6. Risk: Having submitted the iRSS the Council is able to engage fully in the preparation of NPF4, present a succinct picture of the strategic infrastructure priorities of the area and influence the direction of NPF4 which may not be promoted adequately without the iRSS.
- 7.7 Customer Service: PLDP2, the Economic Strategy and Rural Growth Deal have all been subject to consultation and/or Committee process. The Council is fulfilling its customer service role by actively engaging in the preparation of NPF4 to ensure ABC issues are raised.

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## **APPENDIX 1**

**Scottish Government Feedback On Indicative Regional Spatial Strategy (iRSS)**