

NATIONAL PLANNING FRAMEWORK 4 FINAL DRAFT CONSULTATION

1.0 EXECUTIVE SUMMARY

- 1.1 The [Draft Fourth National Planning Framework \(Draft NPF4\)](#) was laid in the Scottish Parliament on 10 November 2021 and is considered for 120 days. The Final Draft is expected in summer 2022.
- 1.2 As a result of the Planning (Scotland) Act 2019, the NPF4 will have enhanced status as part of the statutory development plan. The Scottish Government aim is that it guides spatial development, aligns with infrastructure investment, sets out national planning policies, designates national developments and highlights regional spatial priorities. A long-term spatial strategy for Scotland to 2045, NPF4 is intended to bring together policies and programmes to enable sustainable and inclusive growth across the country.
- 1.3 In future, proposals for planning permission will need to be determined in accordance with NPF4 as well as the LDP unless material consideration dictate otherwise. The NPF4 also sets a 10 year Minimum Housing Land Requirement for Argyll and Bute of 2150 houses.
- 1.4 The current consultation closes on the 31st March 2022. This report outlines the content of draft NPF4, and asks members to endorse proposed comments contained in Appendix 1 which will subsequently be submitted to the Scottish Government.

2.0 RECOMMENDATION:

- 2.1 It is recommended that PPSL:
- note that when approved by Scottish Government, NPF4 will become part of the Statutory Development Plan for Argyll and Bute; and
 - note the report and the link to [Draft Fourth National Planning Framework \(Draft NPF4\)](#), and
 - Approve the response in Appendix 1 for submission to Scottish Government.

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3.0 INTRODUCTION

- 3.1 The [Draft Fourth National Planning Framework \(Draft NPF4\)](#) was laid in the Scottish Parliament on 10 November 2021 and the Parliament considers it for 120 days. The Final Draft is expected in summer 2022.
- 3.2 The current consultation, the last stage of an ongoing engagement since Autumn 2019, closes on the 31st March 2022.
- 3.3 This report outlines the content of draft NPF4 and presents comments within Appendix 1 which it seeks approval to submitted to the Scottish Government.

4.0 RECOMMENDATION

- 4.1 It is recommended that ELT:
- note that when approved by Scottish Government, NPF4 will become part of the Statutory Development Plan for Argyll and Bute; and
 - note the report and the link to [Draft Fourth National Planning Framework \(Draft NPF4\)](#), and
 - Approve the response in Appendix 1 for submission to Scottish Government.

5.0 DETAIL

- 5.1 The [Draft Fourth National Planning Framework \(Draft NPF4\)](#) was laid in the Scottish Parliament on 10 November 2021 and the Parliament considers it for 120 days. The Final Draft is expected in summer 2022, and it will be accompanied by an explanatory document setting out any changes made in response to the consultations or why changes have not been made.
- 5.2 The deadline for consultation responses is the 31st March 2022.

- 5.3 This is the final part of a consultation process which has been ongoing since Autumn 2019. The consultation has aimed to be collaborative in its engagement and has been based around the input from voluntary regional groupings of Local Authorities as a pre-cursor to the production of Regional Spatial Strategies after the NPF has been produced. Argyll and Bute chose not to join one of the regional groups but to make representation as a single Authority which overlapped other Regional Areas.
- 5.4 During the period of the engagement, officers of the Council have inputted to numerous workshops and stakeholder sessions held by Scottish Government and HOPS. In addition the Council has submitted comments to Scottish Government on the development of its thinking which was articulated in an “NPF4 Position Statement”. Most significantly, at the request of Scottish Government, the Council also produced an Indicative Regional Spatial Strategy (IRSS) which was approved by PPSL in September 2020 and submitted to Scottish Government. The IRSS submitted by Local Authorities have been used by Scottish Government to formulate the NPF4 Spatial Strategy.
- 5.5 Officers’ view is that the consultation process adopted by Scottish Government to date, although time pressured, was appropriate and proportionate with ample opportunities for participation.
- 5.6 As a result of the Planning (Scotland) Act 2019, the NPF4 will have enhanced status as part of the statutory development plan. The Scottish Government aim is that it guides spatial development, aligns with infrastructure investment, sets out national planning policies, designates national developments and highlights regional spatial priorities. A long-term spatial strategy for Scotland to 2045, NPF4 is intended to bring together policies and programmes to enable sustainable and inclusive growth across the country.
- 5.7 The first National Planning Framework for Scotland was published in 2004, and has been updated periodically since. They have been very high level spatial expressions of policy. In terms of land use planning decisions it would be reasonable to say it has had very limited impact. In terms of alignment of National Investment Programmes and delivery of investment, it is less easy to comment, but on balance it would not seem to have been a significant driver for the Scottish Government decision making.
- 5.8 NPF4, under the new Planning Act, represents a very significant departure and the NPF4 will undoubtedly have more impact. Under the new Planning Act, NPF4 becomes part of the “Development Plan” for all Local Authorities. This means several things:
- Proposals for planning permission will need to be determined in accordance with NPF4 as well as the LDP unless material consideration dictate otherwise.
 - Local Development Plans will need to be in conformity with NPF4.

- NPF4 will set a high level spatial strategy for all areas of Scotland, and Local Development Plans will need to reflect and develop this strategy.
- NPF4 sets out high level requirements which LDPs will need to articulate in detail at the local level.
- NPF4 sets Minimum Housing Land Requirements for all Local Authorities.
- NPF4 transcribes previous Scottish Planning Policy guidance into national Development Management policies which will form the basis of decision making for planning applications
- NPF4 identifies National Developments which are given support in principle.
- NPF4 content is expected to be aligned with future Scottish Government investment programmes, and it is anticipated it should thus reflect the spatial delivery of those programmes.

5.9 The NPF4's content is set out in in four main parts as follows:

Part 1: A National Spatial Strategy For Scotland:

5.10 The Plan sets out a broad high level planning strategy for Scotland. The aim is that this strategy will guide the preparation of Regional Spatial Strategies, Local Development Plans and Local Place Plans. Scotland is divided into five **Action Areas** as shown below in Diagram 1 below.

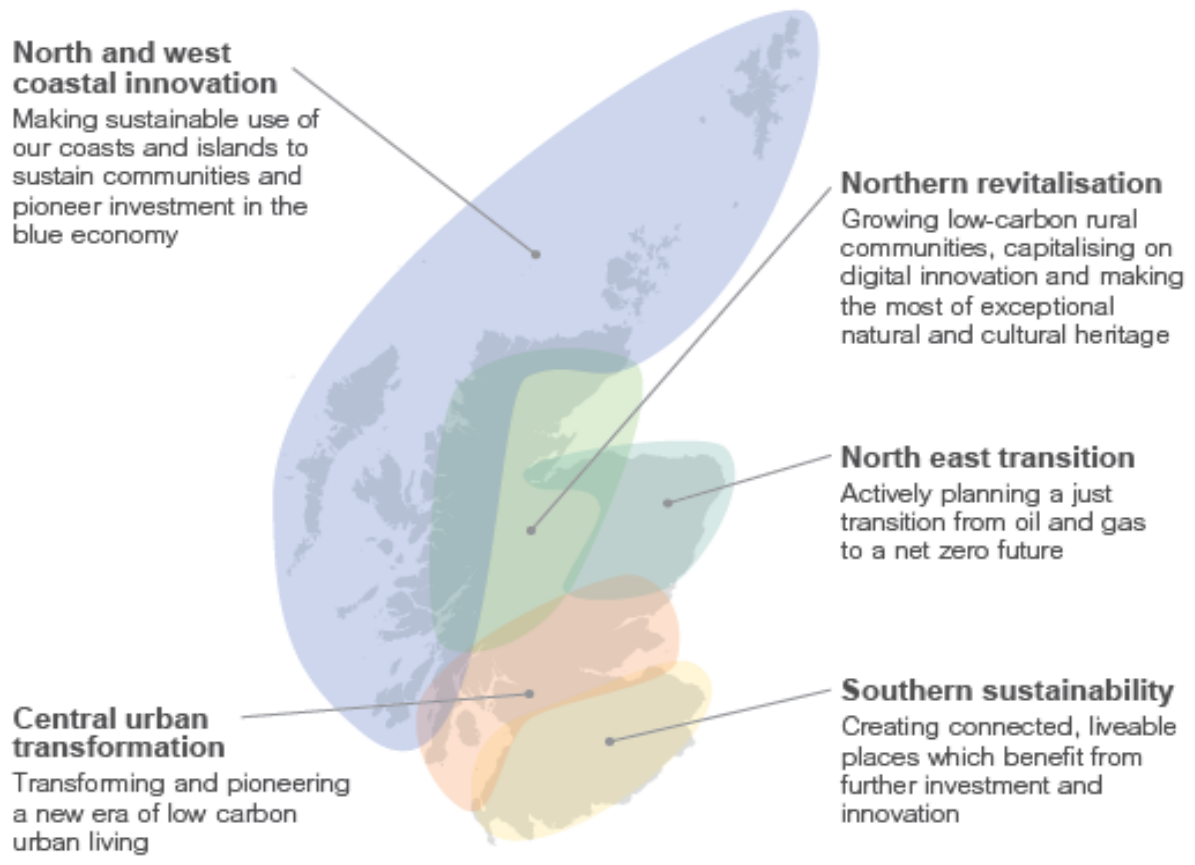


Diagram 1: Five Action Areas

- 5.11 There is strong emphasis on the drive to net zero emissions by 2045 and the need to adapt to climate change, restore biodiversity loss, improve health and wellbeing and build a well-being economy. Each part of Scotland should be planned to deliver sustainable, liveable, productive and distinctive places.
- 5.12 The NPF4 aims to create networks of 20 minute neighbourhoods; and commits to support development across Scotland, in particular to enable more people to live and remain in rural and island areas.
- 5.13 Argyll and Bute lies within three of the **Action Areas** that have been identified as shown below:

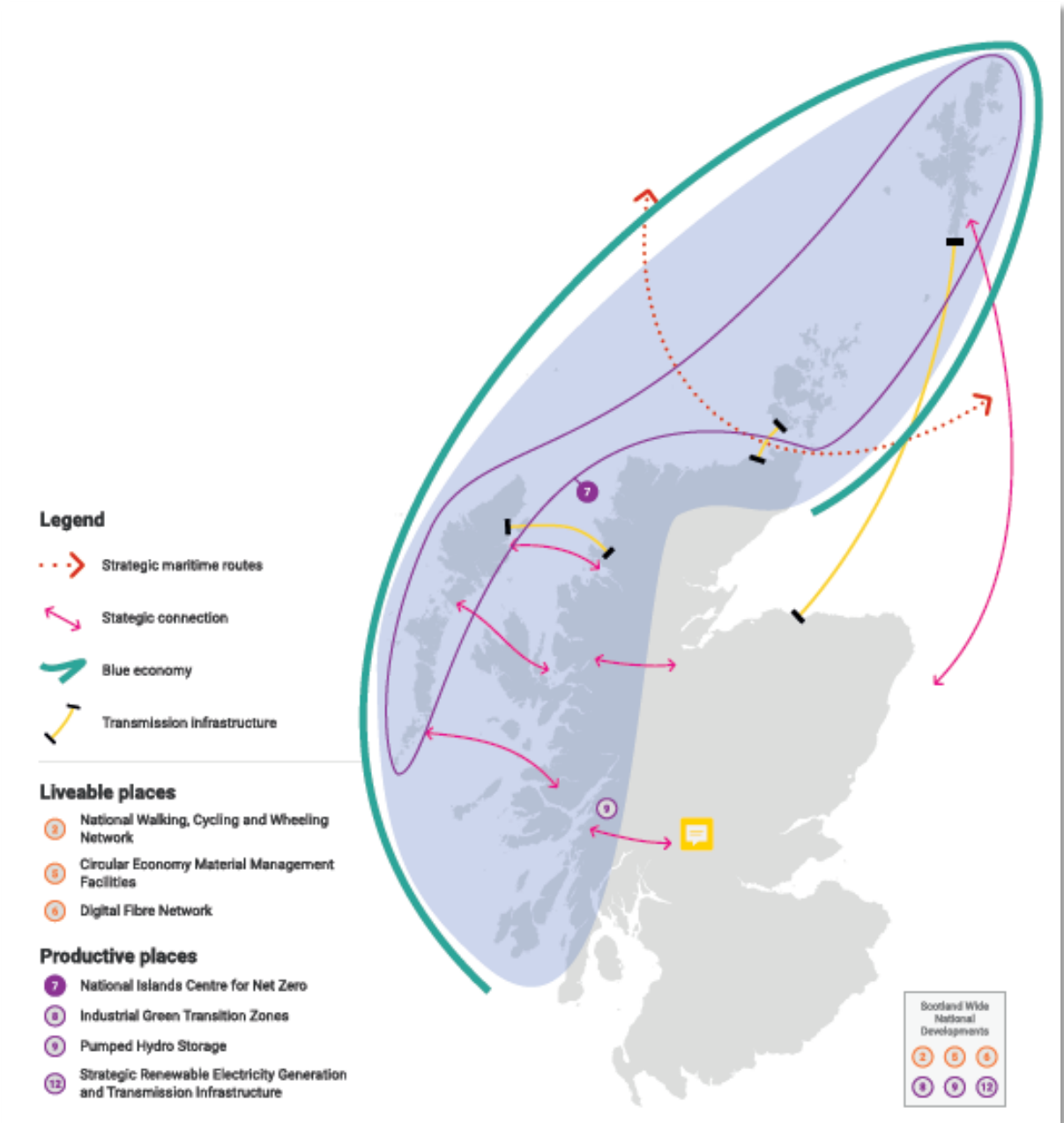


Diagram 2: North West Coastal Innovation

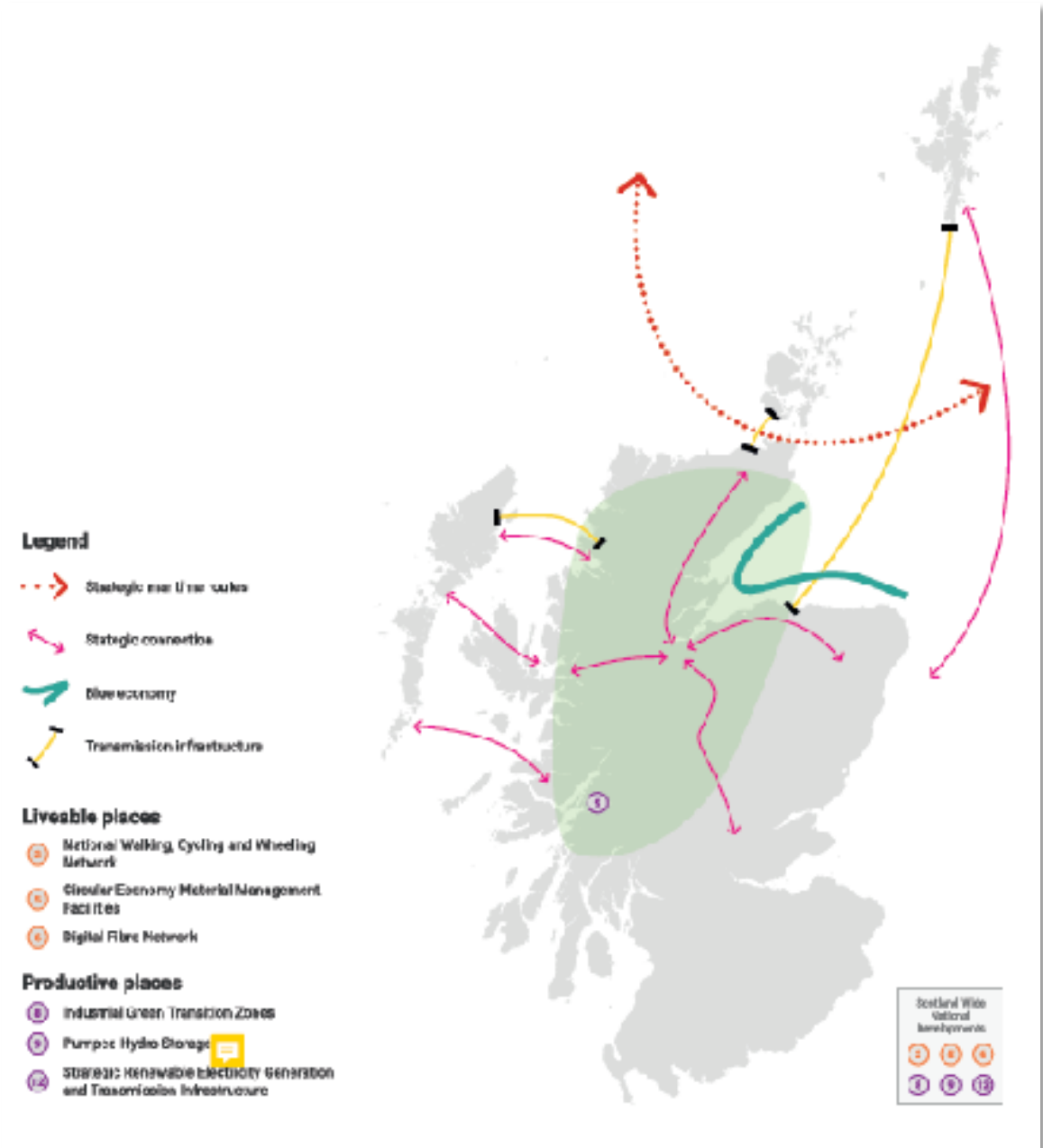


Diagram 3: Northern Revitalisation

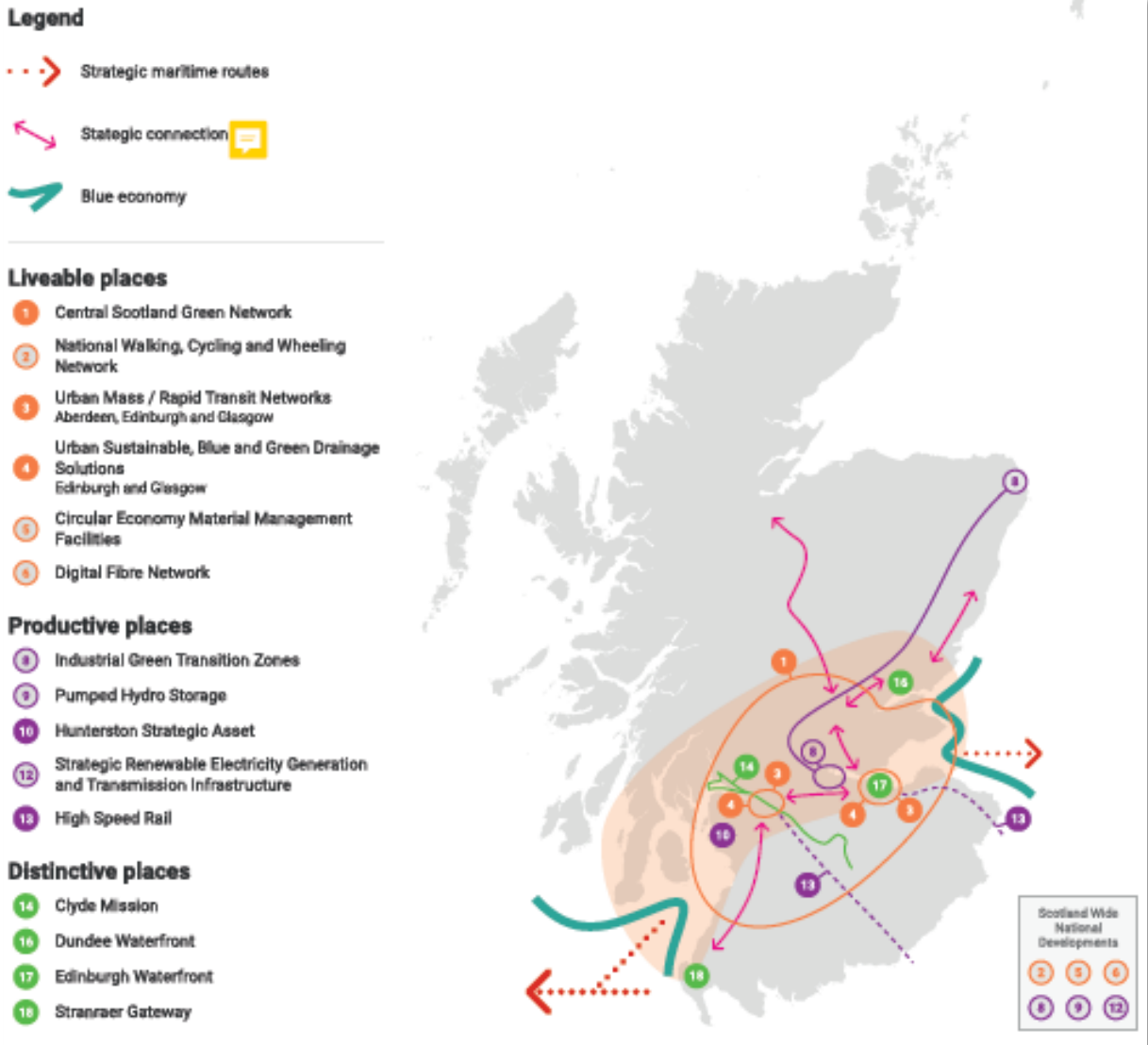


Diagram 4: Central Urban Transformation

5.14 Because these strategies are so high level it is debatable what impact they will actually have. Nevertheless, these strategies reflect the Indicative Regional Spatial Strategy which was submitted to Scottish Government and because it appears in 3 of the 5 Action Areas, Argyll and Bute has been mentioned more than would be proportionate in-terms of the number of Local Authorities. Specific mentions include:

- Cruachan and other pumped Storage;
- Clyde Mission;
- Population Growth on the Western Seaboard of Argyll;
- Growth corridor from Tobermory to Oban and on to Dalmally;
- Kintyre Way;
- Argyll Sea Kayak Trail;
- Crinan Canal;

- Argyll world renowned stunning landscapes, rich biodiversity and cultural heritage;
- Urgent need for improvements to the A83 to ensure resilience of the economy and communities of wider Argyll and Bute Council;
- Oban Airport;
- Oban town as a link to the islands;
- Tarbert, Lochgilphead and Campbeltown as important hubs for their areas;
- Oban developing as a University Town and the European Marine Science Park as a key employment and education opportunity;
- Key strategic sites for port infrastructure at Oban;
- Oban as a coastal settlement with strong links to the north; and
- Coastal communities regeneration in Dunoon & Rothesay.
- Machrihanish space port.
- Machrihanish development hub for aquaculture research.

Part 2: National Developments

5.15 NPF4 sets out 18 proposed national developments that support the spatial strategy and whose development is agreed in principle.

5.16 Within Argyll and Bute these include:

- Cruachan and other pumped storage schemes
- Clyde Mission including all sites within 500m of the river.

5.17 Others that are non-site specific but could fall within Argyll and Bute include:

- Central Scotland Green Network.
- National Walking, Cycling and Wheeling Network.
- Circular Economy Materials management Facilities.
- Digital Fibre Network.
- Strategic Renewable Electricity Generation and Transmission Infrastructure

Part 3: National Planning Policy Handbook

5.18 This section sets out policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This section represents the integration of Scottish Planning Policy and is particularly important as it will set the policy framework for all decision making on individual investment and planning applications and appeals.

5.19 The section is divided by the four themes articulated in the strategy of: Sustainable, Liveable, Productive and Distinctive Places. It contains 35 policies. The coverage of these is generally as previously in SPP, however key introductions are:

- 20 minute neighbourhoods;
- Stronger polices on:

- designing quality places,
 - climate resilience,
 - soils, biodiversity; and
 - carbon emissions.
- 5.20 The conclusion of Heads of Planning (HOPS) including our representatives is that in overall terms the policy wording is too loose and imprecise and will not stand up to rigorous and forensic legal challenges, weakening the opportunity to drive change through the policy intentions. This has been confirmed with separate discussions with private developers. Consequently, NPF4 needs to be more clear, precise and unambiguous. In particular, the national policies in NPF4 require to be clearly understandable and deliverable. There are too many “coulds” and “shoulds” rather than including words and terms that direct change to be done i.e. “must” and “has to”.
- 5.21 The policies will also introduce extra Local Development Plan work, both explicitly by requiring LDPs to identify certain elements; (i.e.: to categorize all countryside areas as either accessible; intermediate or remote) and unintentionally as a result of high level policies which will require more detailed guidance to be produced in or supporting LDPs (i.e.: policies on the climate emergency have a variety of requirements in terms of minimizing emissions from development proposals but there is little detail on standards to be applied which will consequently require to be covered by other guidance).
- 5.22 Officers have produced a detailed list of specific comments on individual policies in an effort to promote clearer and more robust wording to aid deliverability of NPF4 overarching objectives. These are contained in Appendix 1 of this report.

Part 4: Delivering Our Spatial Strategy

- 5.23 The NPF4 does not set out a detailed Delivery Programme although it has stated that this will come forward as part of the final plan and that there will be further engagement with stakeholders at a later date on this issue. As it is, The Delivery Strategy is a high level strategy, and outlines:
- the need for collaborative action from the public and private sectors;
 - the need for aligning resources including existing or planned public sector investment;
 - an Infrastructure First approach and based on the Infrastructure Investment Plan; STPR2 and City Region growth deals;
 - how we will deliver this strategy. This will be developed into a standalone, live delivery programme once NPF4 has been approved and adopted;
 - Local Place Plans; and
 - Investing in the planning service.
- 5.24 The proposed Delivery Programme is instrumental to success, along with the demonstrable delivery of aligned public sector investment. Officers will seek

to engage with the proposed “Delivery Programme” consultation as it comes forward.

ANNEX B: Minimum All Tenure Housing Land Requirement

- 5.25 A significant change for the NPF4 is that it is setting housing land requirements for the whole of Scotland, at a Local Authority Area level, instead of this being done by Local Authorities themselves within their own LDPs. This was a major departure in terms of delivering a national planning strategy; and has been the cause of considerable debate particularly in city region areas where there is often extreme pressure on land supply. Within Argyll and Bute, and other rural areas, this has also been a cause for concern because of our demographic forecasts which predict falling populations. From a statistical point of view, these forecasts have made it challenging to justify our proposed growth strategies which will support reversing these trends by amongst other things increasing housing land supply. Scottish Government originally proposed a housing land requirement for Argyll and Bute that relied merely on the raw demographic forecasting without any reflection for our strategic aims. However after work on the Housing Needs and Demand Assessment and the Local Housing Strategy, an NPF4 ten year proposed minimum housing land requirement of 2,150 aligns with our own forecasts and strategic aims.

6.0 CONCLUSION

- 6.1 The draft NPF4 is a significant national document in land use planning terms because for the first time, once adopted by Scottish Government, it will become part of the Development Plan for Argyll and Bute. This means planning applications will need to be determined in accordance with its policies.
- 6.2 The draft NPF4 represents the last stage of a relatively detailed and lengthy engagement process with Local Authorities and other stakeholders. The NPF4 spatial strategy for Scotland includes some of the main elements of Argyll and Bute Strategic policy. The proposed housing land requirement for Argyll and Bute aligns well with the aims of the Local Housing Strategy. The proposed development management policies within the NPF4 could be improved to provide better clarity and precision in terms of future decision making. The NPF4 will create additional workload for the LDP team which has yet to be fully quantified with no sign of additional resource to assist with this issue.
- 6.3 The current consultation runs until the 31st March 2022. Officers have prepared detailed responses to the document which Members are requested to endorse for submission to Scottish Government.

7.0 IMPLICATIONS

7.1 Policy:

When approved by Scottish Government, NPF4 will become part of the Statutory Development Plan for Argyll and Bute, and as such planning applications will need to be determined in accordance with it. In addition

future LDPs will be expected to deliver at a local level the high level spatial strategy contained within the NPF4.

7.2 Financial

NPF4 sets out additional requirements that will need to be fulfilled in production of future LDPs. In addition, as written it is likely additional planning guidance will need to be produced to assist in the implementation and interpretation of Development Management policies within the NPF4.

7.3 Legal

When approved by Scottish Government, NPF4 will become part of the Statutory Development Plan for Argyll and Bute, and as such planning applications will need to be determined in accordance with it.

7.4 HR None.

7.5 Fairer Scotland Duty:

7.5.1 Equalities - protected characteristics

The Scottish Government document will need to demonstrate it has been prepared to promote equal opportunities and principles of inclusion and diversity.

7.5.2 Socio-economic Duty

Scottish Government assessment will be required.

7.5.3 Islands

Scottish Government islands impact assessment will be required.

7.6 Risk None

7.7 **Climate Change** Planning has a critical role in the delivery of a net zero Scotland and NPF4 as a National Strategy can help achieve this.

7.8 **Customer Service** None

Kirsty Flanagan, Executive Director with responsibility for Development and Economic Growth

Councillor David Kinniburgh Policy Lead for PPSL

For further information contact:

Matt Mulderrig Matt.Mulderrig@argyll-bute.gov.uk 01436658925

Fergus Murray – Fergus.murray@argyll-bute.gov.uk – 01546 604 293

Appendix 1 – Draft NPF4 Consultation Response

APPENDIX 1 DRAFT NPF4 CONSULTATION RESPONSES

Part 1 National Spatial Strategy

Sustainable Places

Q1 Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

It makes no mention of the retrospective challenges which must be addressed to achieve net zero, particularly reducing and electrifying energy use of our existing buildings. Without addressing that you have a significant gap. We also need to tackle embodied energy of all new build on a much more ambitious scale. The section refers to Just Transition sector plans but there is no definition of what this is. It would be helpful to define it. Is this an opportunity to recompense local areas that are seeing more of the renewals developments impacting on their areas and yet with limited direct local benefits?

National Spatial Strategy diagram key under National strategic programmes has a spelling typo: "neighbourhoods".

Liveable Places

Q2: Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

The transformative change advocated will be difficult to achieve without empowering local authorities, and most effectively, planning authorities, to implement planned improvements. This would be best done by replacing sporadic competitive grant awards, with improved and ring fenced local authority funding, either through general grant or other new fiscal arrangements. The private sector is unlikely to successfully deliver transformative social and economic change without either significant legislative and fiscal incentive, or being led by public sector investment.

Productive Places

Q3: Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

See answer to Q2. Again the most likely success would come from significant public interventions and investment which has the best potential to achieve these aims and to stimulate the private sector. Notwithstanding that, the last sentence could specifically refer to the role of planning obligations.

Distinctive Places

Q4: Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

This approach is very high level and over-arching. We support its aims, although in itself it will not deliver them. It is the underpinning policies which are of more importance, and the alignment of public sector investment in a way which helps to deliver these aims as articulated in answers above.

There is a need in the document for consistent wording. In the fourth paragraph, the wording "value, enhance, conserve and celebrate" does not align with the second paragraph on this same page ("value, enjoy, protect and enhance") or Policy 28 which seeks to "protect and enhance". They should be amended to be consistent.

In the last sentence, there is a need to accelerate the production of Regional Marine Plans if they are to be relied on in delivering a robust policy framework.

Spatial Principles For Scotland

Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

Support the recognition that no single policy on its own will deliver the aims, a holistic approach is needed. The 6 spatial principles in themselves are a reasonable set of aspirations reflecting the current challenges the country faces. However, it is not clear how they are to be used in decision making. NPF4 lacks any real ambition for rural Scotland to be a driver of change through delivering green economic growth and net zero. There remains a significant concern that there is over emphasis on urban issues and solutions at the expense of recognised rural issues, particularly local living in 20 minute neighbourhoods which must be pragmatically applied taking account of its local context. The meaning of "Urban and rural synergy" should be further explained as this is a critically important aspect for Argyll and Bute and its relationship with the Central Belt. A just transition is a sentiment we would support but when most renewable energy developments are of a scale that requires them to be determined nationally, it is imperative that those involved with that decision making ensure there are appropriate local benefits and mitigations or there is a significant risk of alienating the local populations which should be benefiting from new investments.

Action areas for Scotland 2045

Q7: Do you agree that these spatial strategy action areas provide a strong basis to take

forward regional priority actions?

It is virtually impossible to come up with a national strategy which says everything about everywhere and deciding what to include and what not, is not something that has a right and wrong answer.

The spatial strategy action areas reflect the national engagement which was undertaken by Scottish Government with Local Authorities, and particularly the input which flowed from indicative regional spatial strategies. Argyll and Bute is shown, partially, within three of the Action Areas and this reflects the discussions council Officers were involved with.

We agree that the Strategy Action Areas form a sensible basis to take forward regional priority actions. We agree with the areas of overlap which reflect the combined inter-relationships that different areas have, and the simple boundaries which also reflect the fact that no exact boundary between areas is logical. Perhaps this should be explicitly explained in the text.

North and west coastal innovation Action Area

Q8: Do you agree with this summary of challenges and opportunities for this action area?

Q9: What are your views on these strategic actions for this action area?

Agree the section gives a reasonable summary, although not everything is covered, it is acknowledged at a national level not everything can be included in the plan. The strategic approach outlined is covering the main pertinent issues, but we are not sure that "strategic actions" stand out very clearly. These should perhaps be highlighted, and we assume these would then be Scottish Government actions as it's their plan. Would they then go into the Delivery Programme.

Specific comments:

On page 12, the end of the first para should be extended "*..outcomes and for it to capitalise on this with local benefits.*"

Kennacraig should be included in the list of key centres with lifeline links on p12 (ferries to Islay, Jura, Colonsay).

It is difficult to see why South Kintyre would not lie within the North and west coastal innovation Area as opposed to the Central urban transformation, or at least in the overlap?

Page 14 Diagram, transmission infrastructure to Islay which will need to be upgraded to facilitate offshore renewables. (Is that correct?)

Action 1 Create Carbon Neutral coastal and island communities. 5th para. 3rd sentence regarding homes that meet diverse community needs, would benefit from addition at the end of the sentence "...and to attract economically active new population to the area."

6th para regarding reversing de-population is focused on reintroducing people to previously inhabited areas. In practice new population growth may be achieved in new previously uninhabited areas. Suggest qualifying the people to be "reintroduced" as "economically active", as this is what is required to create sustainable communities.

Action 2 Support the Blue and Wellbeing Economies. The second sentence isn't very clear, does it mean development of downstream activities related to marine activity will increase competition for marine space and resources. If so why? Suggest clarifying the sentence.

In 3rd para. Include Port Askaig, Islay as a Key strategic site for investment associated with port infrastructure to support offshore renewables.

Last para. P18, should refer also to improved grid connection for Islay to support renewables.

Northern revitalisation Action Area

Q10: Do you agree with this summary of challenges and opportunities for this action area?

Q11: What are your views on these strategic actions for this action area?

Agree the section gives a reasonable summary.

Welcome inclusion of pumped storage at Cruachan, and Oban strategic connection westwards. Would suggest thematic inclusion of strategic connections to the central belt on the west coast as well as the east coast, ie: A82, A83, A85. There is no mention of the potential to increase local industrial utilisation of the increasing clean green energy production instead of transmitting it all to the central belt. This could have a significant impact of tackling rural de-population.

Specific comments:

6. Stimulate green prosperity

The 5th para. Of this section refers to the activity of key ports and their range of uses. Oban is identified as a major port / hub for leisure / aquaculture/fishing/ferry and cruise activity and has the potential to support offshore renewables development on the west coast. It would sensibly be included in the list of ports.

8. Strengthen resilience and decarbonise connectivity

Welcome the recognition of urgent need to improve the A83 for the resilience of wider Argyll and Bute. Would hope to see a timetable for delivery in the Delivery Programme when it is produced and recognising the urgency. Improving the A83 also goes beyond the issue with the Rest and Be Thankful it includes the whole route which is a lifeline link that requires investment to be safer and more resilient to climate change.

Welcome inclusion of Oban Airport, but suggest it is also identified as a hub for island communities given it serves the islands of Colonsay, Coll, Tiree and Islay.

In second paragraph what about role of timber movement by sea which is a major issue in rural areas.

Central urban transformation Action Area

Q14: Do you agree with this summary of challenges and opportunities for this action area?

Q15: What are your views on these strategic actions for this action area?

Agree the section gives a reasonable summary.

Welcome inclusion of Clyde Mission that includes Dunoon and Helensburgh which have their own challenges and opportunities for sustainable economic growth.

Specific Comments:

16. Rediscover urban coasts and waterfronts

Support mention of regeneration in coastal communities such as Dunoon and Rothesay, but suggest adding “and Helensburgh which has significant employment opportunities close by. Regeneration of these areas is supported by Argyll and Bute Rural Growth Deal”

Reference to accede to the European Union refers only to impact on eastern ports. The potential impact would be significant in terms of movements southwards to England as there would be no free movement, and westwards to Ireland if Scotland were an EU bridge. It is questionable if this currently has a place in the NPF.

19. Grow a wellbeing economy

Section states Ayrshire Growth Deal is aligning with Clyde Mission. This is a difficult reference to understand why North Ayrshire is referenced here given they are not part of the Clyde Mission. Argyll and Bute on the other hand is a key part of the Clyde Mission working alongside the Glasgow City Deal partners and needs to be referenced as such given the inclusion of Helensburgh and Dunoon..

Part 2 National Developments

Q19: Do you think that any of the classes of development described in the Statements of Need should be changed or additional classes added in order to deliver the national development described?

Q20: Is the level of information in the Statements of Need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

These questions regarding need are confusing. The assumption from reading p44 is that the assessment of need has been carried out and agreed during the production of NPF4 and that is why there then follows an agreement in principle of the proposed National Development. In that case it is difficult to see how an assessment of need will be required? If the intention of the need section is other than to justify its inclusion within the NPF4 then this should be clarified.

Specific comments:

It is not clear what "national development handling procedures" are? Does this refer to how a Local authority should deal with an application for a national development, or is it a list of things the promoters of a development should consider? The list of bullets in the left hand column of p44 is perhaps the procedure? but if so it should explicitly say that this is the case.

If there is an agreement in principle for National Developments, how will this apply to thematically identified non-site specific National Developments, for example pumped storage schemes?

6. Digital Fibre Network

Does Green data centre need defining?

9. Pumped Hydro Storage

Support inclusion of Ben Cruachan and the potential for other pumped storage schemes including a proposed scheme south of Loch Awe adjacent to Inveraray with a potential capacity of 1.4GW.

In the Designation and Classes of Development, does criterion b) need to be extended at the end of the sentence to say “..related to the pumped storage development.” Otherwise it would apply to all electricity generating structures.

More specific requirement should be mentioned of the need to create local economic/community benefits and employment arising from such developments which have the potential to have significant impacts on local infrastructure and the quality of life of local communities.

14. Clyde Mission

Support identification of this as a National Development, and its mapping to include western edges of Clyde.

Under Designation and classes of development, criterion a) assume mixed use “could” include residential, not “must” include which is how it reads currently.

As the policy is written, any “major” development identified in the list of classes and within 500m of the Clyde would be a National Development and enjoy a presumption in favour of its principle. Clarity is required about what the intention is?

Q21: Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

NPF4 does not recognise the scale of investment planned in rural Scotland including Argyll and Bute to deliver a green recovery and unlock the potential of our collective rural economy. In particular the potential scale of growth in green energy is not recognised and its potential to unlock new industries such as the space industry, on shore aquaculture, data centres, adding value to products in the food and drink industry and helping drive growth in tourism. This can be clearly identified in the lack of national developments identified in Argyll and Bute and in the wider Highlands and Islands Region.

In Argyll and Bute in addition to Cruachan there is a case for HMNB Clyde and the development of the Maritime Change Programme to be recognised as a National Development that is regarded as integral to the ambitions of the Clyde Mission and reversing population decline in Argyll and Bute together with West Dunbartonshire.

In addition a case can also be made for the life/marine science cluster at SAMs, a key part of the Argyll and Bute Rural Growth Deal, at Dunbeg/Oban that continues to grow and assist the development of the important aquaculture and marine focussed industries. SAMS also lies at the heart of the Tobermory-Oban-Dalmally Growth Corridor and the North Lorn Economic Zone and helps drive the continued growth of Oban a major port on the west coast of Scotland.

Also the inclusion of Machrihanish a substantial employment zone located close to major sources of green energy with the potential to be a spaceport, a major site for on shore aquaculture expansion, a data centre location and food and drink expansion related to the Campbeltown whisky region that is expanding to meet global demand.

Part 3 Sustainable Places (Universal Policies)

General comments on all policies:

An overall sense-check of the draft policies to ensure that any potential conflicts or questions over precedence can be ironed out would be beneficial, for example, it is noted that there appears to be an unqualified support for the principle of development across various different, and potentially conflicting, policy themes. The general caveat on Page 3 of Draft NPF4 should be repeated at the beginning of Part 3. In addition, careful consideration needs to be given to the fact that most policies explain what will be supported, but they do not say what is not appropriate. Unless there is an overall caveat that things not supported by policy are inappropriate, or individual policies are redrafted to identify what is not appropriate, there is a potential policy vacuum which is very likely to be used by developers/agents to promote inappropriate things not identified in the NPF4 with the potential to undermine future capacity for development we need to meet national priorities. Suggest inserting in How to Use This Document at end of Part 3 sentence "...proposals which are not consistent with the policy framework of the plan will not be supported.." or similar wording.

- Many draft policies include a mix of instructions for the preparation of Local Development Plans and more specific planning policies. It is felt that the former should not be included within the specific policy and instead sit in the policy introduction text.
- It is noted that frequent use of a bold typeface is evident throughout the draft policies; officers are unsure of the relevance of the words highlighted and contend this emboldening should be removed in the final NPF4 to avoid user confusion.
- The majority of draft policies adopt the use of 'should' in terms of what the policy is trying to achieve. This significantly weakens and causes ambiguity over whether the policy must be complied with and as such, we should seek for this wording to be 'tightened up' in the final NPF4.
- Policies should not recite the law as several do, as this creates inconsistency in terms of the policy approach as there are many places where they do not. In particular this loose and inconsistent use of policy language could falsely imply differing levels of importance. It is strongly suggested all quotes of law and statute removed from policies of the NPF4 final version.

Q22: Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

It should be the primary but not over-riding principle, there are many other interests (economic and social) which may conflict and need to be balanced to identify the best overall outcome for a particular community. There could also be unforeseen consequences of this one size fits all policy approach in dealing with climate change in terms of helping to prevent it, and/or dealing with the consequences of climate change (mitigation), given this is a global challenge and not just a national challenge. For example, a complete prohibition of development in existing communities impacted by 1 in 200 flood events will have huge consequences for these communities a number of which exist in Argyll and Bute. Instead, there may be a need to employ instead various mitigation measures in areas such as these where development already exists with considerable embedded energy costs, public and private investment.

Q23: Do you agree with this policy approach? (Policy 1 Plan-led approach to sustainable development)

It is not obvious or realistic that an LDP can genuinely contribute to all of the 17 UN goals some of which clearly relate to inter-country and global issues. The translation of these to National Outcomes makes sense and seems to more directly relate to LDPs. There is nothing wrong with the UN goals but by having policy worded like this there is potential to create complexity, un-intended consequences and additional workload.

Is this wording needed as a policy? Is it not better as reference in the text, particularly as it is simply repeating legislative requirements.

Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency? (Policy 2: Climate emergency)

In general needs to be more specific about what and how to assess against and what standards would help.

Criterion a) Reference to Global Climate Emergency is quite vague and it would be better to refer to some enacted Scottish Legislation.

Criterion b) the decarbonisation pathways appear to be designed for industry and may not apply to all types of development, suggest finishing the criterion after “..lifecycle.”

Criterion c) “significant emissions” should be defined. Does “whole-life assessment” mean consideration of embodied energy. If so we need to know what standard is to be used? It should be noted that RICS provides one. Also, who defines what other proposals should be considered in establishing a combined effect? i.e. How wide a net to cast? Who establishes what the minimum level of profit will be considered viable? Whose opinion will ultimately determine what is the long-term public interest or not?

Criterion b) what scale does this apply to? all householder developments for example as this appears to be onerous?

Q25: Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis? (Policy 3: Nature crisis)

Criterion d) it is not clear why applications for fish or shellfish development are excluded?

Criterion e) last sentence would be clearer if it began “Local Development Plan proposals....”

Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality? (Policy 4: Human rights and equality)

It is not clear why these need to be a policy in a National Planning document concerned with land use as they are covered elsewhere by legislation.

Q27: Do you agree that planning policy should support community wealth building, and does this policy deliver this? (Policy 5: Community wealth building)

Argyll and Bute supports the policy in principle but should it not either in policy or glossary define “community wealth building” and its objectives? Why not local development?

Q28: Do you agree that this policy will enable the planning system to promote design, quality and place? (Policy 6: Design, quality and place)

Criterion a) Starting the paragraph by suggesting that proposals “should be designed to a high quality” does not actually really set out anything measurable. It would help to set out the way in which successful design is achieved by starting the paragraph with the need to understand the character and sense of place (and also aspects such as urban grain, urban form historic development etc.), and then going on to talk about how the design and its scale, massing, detailing and materials should respond to this to achieve a high quality design.

Criterion b) The policy seems to imply use of "design guidance adopted by planning authorities **or** statutory consultees" This could include Community Councils and we are not sure that would be the intention. Would it not be better to say Key Agencies? In planning terms we really only "adopt" the development plan. It would it be clearer and more precise to say "approved" not adopted, especially as we will no longer have Supplementary Guidance.

Criterion d) What is poorly designed? Suggest rewording criteria to: "poorly designed" does not set out anything measurable. Rephrase as something like "Development proposals that are not consistent with the six qualities of place and that have not followed an analytical and responsive design process should not be supported".

Criterion e), some bad neighbour developments (e.g. waste disposal, waste water treatment) are required and identifying suitable location and mitigation are required.

The Six Qualities of a Successful Place would be better referenced to PAN68 design statements for wording that can be applied in terms of analysis and interpretation of an area.

It would be useful to refer here to re-use of buildings in terms of embodied energy and how this can be more sustainable than a new building.

Q29: Do you agree that this policy sufficiently addresses the need to support local living? (Policy 7: Local living)

Generally this is a sensible policy for urban areas, but it remains difficult to see how it can be sensibly applied in rural and remote areas where travelling distances for routine basic services is generally more than 20 minutes. The policy says it can be adjusted to include varying geographical scales including rural and island areas. Argyll and Bute is aware and very much involved in work to explore how this principle can be adapted to rural areas, but it is likely there will need to be specific guidance produced to assist with this interpretation and the NPF should set out the intention to produce it, if it is not to explain within the text.

Argyll and Bute maintain that whilst the aim of the principle is good in terms of reducing the need to travel, the use of the term 20 minutes in a policy is unhelpful when applied at a National level.

Criterion a) typo. "s" required on the end of "neighbourhood"

For clarity it is suggested that deleting "by bringing together relevant policies in this NPF" as it doesn't add anything, all policies of the NPF will apply together and balanced as appropriate. If necessary a specific statement should be clearly added to NPF somewhere to make sure that is the case.

Criterion b) It is not clear what the intention is here? Should the criterion start with "Only Development proposals.....should be supported". Also it is assumed this is not meant to override other parts of the plan in terms of principle, i.e.: should be supported where consistent with the other policies. Again, it may be there is a need for a statement somewhere in the NPF that all policies are considered together. How does this sit with the Town Centre first approach.

Q30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning? (Policy 8: Infrastructure First)

The approach set out is a good one.

Criterion c) If infrastructure is identified in LDPs then the development which needs to use that infrastructure should also be identified, and that is where the contributions should come from. Other non-related development should not be contributing. This criterion should be worded more tightly.

Criterion d) delete last sentence, this is set out in legislation and applies to all policies and conditions.

Q31: Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives? (Policy 9: Quality homes)

Criterion a) For clarity, is this to be expressed as an area (Hectares), or as currently done, land to deliver x number of houses. We assume the latter (x number of houses) but the policy implies the former?

Criterion b) for clarity, suggest inserting "to meet" after "should be established" in the first sentence.

Suggest in second sentence replace "Representing when land will be..." with "Representing when land is expected to be..." This is because we cannot dictate when land comes forward for development.

In the fourth sentence, replace "...should be brought forward..." with "...should be allowed to come forward early.."

Criterion c) Strongly support the principle of tailored approach to housing for rural and island areas. This is crucial to delivery in Argyll and Bute where a significant amount of housing supply comes from windfalls.

Criterion d): This is a repetition of policy 6 and isn't required if the 6 qualities are to be applied to all development.

Criterion e) what will be a statement of community benefit. There is a risk that this statement leads to confusion with planning obligations. Suggest it is worded "statement of community impact" or similar. In essence this is normally already covered within a Design and Impact Statement required for major applications.

Criterion g) suggest "protected land" is defined. Suggest insert "..adequately.." before "..mitigate.." in first bullet. Last bullet, it is not clear what the intent of the last sentence is or its need. The policy is clearly set out with relevant criteria and surely the assessment will be objective.

Criterion i) first bullet, suggest replacing "..delivery programme.." with "..Housing Land Audit.."

Criterion i) Fourth bullet: Suggest there is a need for greater clarity on the meaning of "policy on rural places". Is this referring to development in the countryside as defined by LDPs If so suggest replacing "rural places" with "countryside development within LDPs" or adding a glossary definition of rural places to say the same. In A&B windfall development makes a significant contribution to housing land supply as long as it complies to our "rural or countryside policies", and this is likely true of other remote rural areas. Without its contribution we would struggle to tackle reversing de-population especially on the islands.

Criterion i) fifth bullet: define "small site".

Criterion i) sixth bullet: We are not clear what a Local Authority supported "affordable housing plan" is? Is this the Strategic Housing Investment Plan, something else specific, or just a general description. Given the importance of the policy suggest it is more precise or has a definition. In addition. The SHIP often identifies non-geographically specific proposals, ie the intention to deliver in a particular area of need and this would gain support from this criterion. It should only apply to specific sites identified in the LHS/SHIP.

Criterion j) The last two bullets shouldn't apply in the same way as the first two. As written all householder development would need to be providing adaptations for health conditions and changing climate. We assume this is not the intent. If the intention is to give greater support than otherwise to proposals for health and climate related adaptations, then replacing "and" with "or" after the second and third criteria will achieve that. That being said we don't feel that those two aims would override the first two criteria about neighbourhood amenity so it is possible they should be deleted entirely.

Q32: Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices? (Policy 10: Sustainable transport)

Criterion a): Correct typo by adding "travel" after "sustainable" in the first sentence.

Criterion c): First sentence, suggest there is a need to define what is "..significant..."

Criterion f) Suggest adding to end of first sentence "..unless supported by specific Local development Plan proposals for the junction." These proposals would have already been consulted on with Transport Scotland and agreed in principle. This is essential in rural areas where significant areas of possible development land, even of a small scale, can only be accessed from trunk roads. In addition flexibility should be allowed within growth areas identified in LDPs.

Criterion g): First sentence is unclear in its meaning and suggest it is reworded.

Criterion h): We have proposals for leisure and tourism particularly in remote rural areas which will not be accessible in less than 400m to transport networks, and will be default generate traffic if they are to be viable. This criterion should be removed, or qualified for rural areas.

Criterion i) This criterion will not apply to all development proposals and suggest inserting "Where appropriate..." at the front of the first sentence before "Development.."

Criterion l) Typo, third sentence insert "a" before "..range.."

Q33: Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures? (Policy 11: Heat and cooling)

Policy heavily focused on heat networks which will have limited impact in remote rural areas. Fabric first, on-site generation and storage, and improved siting and design have potential to achieve a greater impact and should be included.

Criterion b) It is not clear what "including retrofit where appropriate" means.

Criterion d) Is there a definition of what the planning system will classify as "low or zero emissions heating"? Is it possible to achieve and maintain this by condition? Does this only apply to new build proposals or would it apply to changes of use?

Criterion g) As almost all domestic houses have mainline networked electricity this criterion would apply to almost all houses even in remote rural areas. Is that the intention? What about in areas that are not smoke control areas?

Q34: Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport? (Policy 12: Blue and green infrastructure, play and sport)

Criterion b) In most cases this will be carried out by developers and may not be within Local Authority gift to deliver. Suggest inserting after "Local Development Plans should.." "seek to" and or replace "identify" with "facilitate". In the last sentence suggest adding "safe" before "accessible".

Criterion g) This introduces a risk of community groups submitting applications for open space on "under-used" land they don't own in order to block future development. What is under-used. Vacant allocated sites are underused often for some time until they are developed and would be vulnerable to this apparent presumption in favour.

Criterion l) long-term stewardship is also required for play space and should be included.

Q35: Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources? (Policy 13: Sustainable flood risk and water Management)

Criterion b) what is "essential infrastructure" for the purposes of this policy.

Criterion g) this should state that private water supply will only be acceptable where a public water supply is not or could not be made available. This is the circumstance which makes it acceptable, but it is not an “exceptional” case in rural areas.

Q36: Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities? (Policies 14 and 15: Health, wellbeing and

Safety)

The preamble to the policy refers to promotion of active lifestyles but neither policy is promoting this.

Criterion b) what would Significant adverse health effects be? Who has the skills to assess that? What would health impact assessments entail, should there not be some guidance / definition?

Criterion d) What about other amenity considerations such as smell, noise and vibration?

Q37: Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green (recovery and build a wellbeing economy? Policy 16: Land and premises for business and employment)

The policy doesn't safeguard industrial and business land, it merely promotes economic development.

Preamble to the policy refers to “good green jobs”. This is somewhat emotive, will all green jobs be good, will they all be well paid? What does it mean in the context of a National Planning document? Suggest removing “good”

Policy should define what “employment uses” are in terms of the policy.

Criterion b) Define Net Economic benefit and how it should be assessed?

Criterion d) what “area” does the policy mean, and what will be the “primary business function”.

Q38: Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments? (Policy 17: Sustainable tourism)

Criterion b) suggest adding "and where they comply with other policies of the plan"

Criterion c) Only seems to apply in areas where there are existing adverse impacts, but tourist facilities can create new adverse impacts.

Welcome criterion e) Does the first bullet mean impact singularly or cumulatively?

Criterion f) would appear to have the potential to reduce vitality in tourism-related facilities, where one viable use might easily change to another viable use but this would be prevented by this criterion. Suggest re-wording.

Q39: Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity? (Policy 18: Culture and creativity)

Support policy.

Q40: Do you agree that this policy will ensure our places support continued expansion of low-carbon and net zero energy technologies as a key contributor to net zero emissions by 2045? (Policy 19: Green energy)

Criterion a) It is not clear what this means given we don't have localised transmission networks. Assume it means maximise an area's potential for "generation" from renewables not its "utilisation of them". If so suggest inserting for clarity. In addition it is not in the LDP's gift to deliver this.

Criterion d) & e) There is no test of what is "unacceptable" or how that balanced judgement would be made.

Criterion e) & f) may also need EIA and LVIA.

Criterion f) Would they be supported even on SAC/SPA/SSSI?

Criterion g) What does this really mean? We can't foresee the eventual end size of turbine blades, and other unforeseen advances so how can we assess if a site is suitable in perpetuity. Or does this mean it should be acceptable as consented in perpetuity?

Criterion h) There is no detail about decarbonisation strategies, and particularly what they might be expected to achieve in terms of "appropriate abatement".

Criterion j) There is nothing about environmental issues of landscape and nature, only aviation? Is this because it is assumed to be covered by other policies?

Criterion k) Support first bullet regarding local and community socio-economic benefit and suggest this is given greater prominence in the policy. Suggest this is a separate criterion from the other bullets and it replaces "must take into account" with "must provide for local and socio-economic benefit".

The meaning of the second bullet is not clear in criterion k).

There is no cross reference to the National Developments which identifies renewables generation thematically and brings with it a presumption in favour of the principle?

Q41: Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy? (Policy 20: Zero waste).

The aim of the policy is supported, but it is not clear, particularly criterion b) how the planning system can require or monitor such things.

Criterion c) Why does this not apply to all scales of development, particularly re-using materials, minimising demolition. However how can the planning system enforce re-use of materials unless they are re-used on that particular project?

Criterion e) Covers local amenity issues, but does not cover wider environmental impacts particularly the natural environment.

Criterion f) Should add the caveat that this is subject to needs and demand assessment for the industrial/business/storage uses. There are some places reserved for one particular use which we may need to preserve.

Q42: Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment? (Policy 21: Aquaculture)

Policy 21: Aquaculture generally fits with the aquaculture policy needs for Argyll and Bute Planning Authority, but would require further detail to determine planning applications. The policy must be clear in stating what new criteria will be used to assess future aquaculture proposals and any changes in practices to reflect industry needs. The way the Policy is currently written is sufficient as a strategic high level document, but we consider as a planning authority dealing with aquaculture planning applications on a daily basis, further criteria should be introduced. Criteria should include, or make provision for:

- Guidance for new forms of development that have fewer environmental impacts such as semi-closed pen, Integrated Multi-Tropic Aquaculture (IMTA), Recirculating Aquaculture Systems (RAS), wrasse and lumpfish hatchery developments, and finfish feed development;
- On-shore, shore-side and off-shore developments;
- Designated sites, habitats and species for nature conservation, (including Priority Marine Features, wild migratory salmonids, and European Protected Species); and provide a biodiversity enhancement guide/toolkit for aquaculture proposals.

Should the above detail not be included in Policy 21, the planning authority will formulate its own policy to address these issues in their LDP.

Seaweed farming is an emerging form of aquaculture that is considered a potential growth sector that will have positive effects in terms of carbon capture and community benefits including wealth building. Whilst at present it is not under planning control, it would be beneficial to recognise its potential positive effects and would be useful to be referred to in Policy 21, should it come under planning control. As an example, in Argyll there is a growing seaweed sector that utilises mixed species, such as shellfish and seaweed Integrated multi-trophic aquaculture (IMTA). In terms of carbon capture, mixed species such as IMTA can offset carbon emissions. Policy 21 and the planning and licensing system needs to support all conceivable aquaculture scenarios.

In criterion b) In order to safeguard migratory fish species, it should be further noted that SEPA will be responsible for incorporating a risk-based spatial tool to manage wild fish interactions between wild salmonids and sea lice from marine finfish farms on the northwest and west coast. Sea trout interactions must also be incorporated into the risk-based spatial tool. It would not be appropriate for planning authorities to continue managing the risk to sea trout through Environmental Management Plans.

In criterion c) development proposals should also be supported where they comply with any local development plan associated technical notes, local Integrated Coastal Zone Management plans and spatial guidance.

Criterion d) should include a point for development proposals to adhere to existing fish farm consolidation and rationalisation policy in the event of existing fish farm infrastructure becoming redundant.

Q43: Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment? (Policy 22: Minerals)

Criterion a) clarify if this is a minimum or maximum landbank. There is a lack of resources to maintain and monitor relevant information to achieve fulfil this criterion, and a National Database and monitoring exercise would assist.

Criterion c) should merely state that such proposals will not be supported. It doesn't need to refer to Scottish Government.

The policy as drafted covers aggregates but no other, more specialist minerals and stone used for construction, which also need to be captured and supported in principle.

Criterion d) As minerals are a finite resource, their sustainable extraction is in some sense impossible. Suggest tightening the wording of the first sentence.

In criterion d) last bullet, proposals for restoration should be focussed on biodiversity enhancement, including where appropriate capitalising on any valuable habitats that have been created through the operation of the scheme such as shelter plantations or wetlands.

Q44: Do you agree that this policy ensures all of our places will be digitally connected? (Policy 23: Digital infrastructure)

Support policy.

Q45: Do you agree that these policies will ensure Scotland's places will support low-carbon urban living? (Policies 24 to 27: Distinctive places)

In the policy preamble, third sentence, it would be better to use the 6 qualities of successful place than introduce more terminology. In the same sentence, for consistency with Policy 28, add "protect and" before "enhance".

Policy 24, Criterion a) identifying networks implies some linkage, which in many remote rural areas will not really exist as it does in denser urban areas. Suggest removal or qualification.

Policy 25 Criterion d) Suggest defining scale of neighbourhood shopping.

Policy 27 Criterion d), first bullet should refer to retention of historic shop frontages and protection of wider historic environment.

Q46: Do you agree that this policy will protect and enhance our historic environment, and support the reuse of redundant or neglected historic buildings? (Policy 28: Historic assets and places)

At the end of the preamble add something about embodied energy in order to assist resistance of historic environment demolition.

The policy would benefit from a standardisation of wording/language and to remove ambiguity.

Policy should refer to local Historic Environment Records (HER)

Criterion a) There is no need for LDPs to identify things that are recorded elsewhere. This does not assist in the quick production of plans.

Criterion b) detailed assessment should be within a Design Statement and this should be referenced here. Managing Changes Guidance Note refers to all criterion of the policy so should be mentioned in a distinct way which makes that clear.

Criterion c) confusingly worded and does not refer to Managing Change Guidance which it should. Suggest re-word "...a building or its setting must only be supported in exceptional circumstances where it has been fully demonstrated that the building meets one of the stringent key test in Managing Change Guidance Notes." Or words to similar effect.

Criterion d) should refer to HES guidance on understanding the definition and extent of setting.

Criterion e) is too restrictive and should clarify that suitable and sensitive contemporary design can be allowed. It should also include the word "detailing" in terms of proposals as often proposals fail to take cognisance of historic detailing e.g. slenderness of window astragals, depth of fascia, size and positioning of dormers, proportions of windows, which are key to successful responsive design. There is also no mention of the contribution that trees and green spaces might make to a conservation area

Criterion f) is confusing and in some cases will make it too difficult for planners to refuse such an application i.e. what are "reasonable efforts"; "reasonable cost". It would be clearer to state that if the building makes a positive contribution to the character of the area then the tests for demolition of a listed building should be followed.

As worded the criterion states the same thing twice in different words: "if the building is of little townscape value" is confusing duplication of the earlier part of the paragraph which requires that it makes a positive contribution to the character.

Criterion g) Change "especially" to "for example" so that the policy is not defining what contributing features might be.

Criterion o) add "significant" before "adverse impacts on" as the current wording would prevent otherwise acceptable development. The criterion is confusing in that it is not clear if it is covering buildings or change to archaeological features. The wording should be clarified or an additional criterion created.

Q47: Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely? (Policy 29: Urban edges and the green belt).

Criterion b) add "including farm diversification" after "agriculture".

Criterion b) penultimate bullet: add to end of bullet "including fully justified and suitable enabling development"

Criterion c) third bullet, add "," after "materials" to make it clear that all of the list must contribute to harmony with the visual character of the green belt.

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

Support policy.

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

It is not clear what a rural place is in terms of the application of the policy. Is it the countryside as defined within development plans generally outwith settlement boundaries, or is it areas (including their settlements) of the country that are relatively remote. Without clarity on this it will be difficult for people to apply these policies consistently and as intended.

Criterion a): It would be helpful to have “accessible”, “intermediate” and “remote” defined. As alluded above it would be helpful to know for example, would a settlement within a remote rural area be considered accessible, or would it be part of the larger remote area?

Criterion b) what is the definition of a previously inhabited area and what is the intention of the criterion? It is likely population growth within remote rural areas will mostly be in or adjacent settlements and this will be more sustainable. Is it intended this would take precedence over areas like NSA, SPA etc. ...? If not it should clarify.

Criterion c): it is not clear which sub-criteria apply mutually or exclusively. Suggest the first three sub-criteria either require "and" or "or" or they should be subsumed into the criteria c) heading if they apply to everything.

Criterion d): Where is this meant to apply geographically? Is it the same as criterion c) (i.e. rural areas and if so what are they) or is it more generally?

Criterion e) this criterion is open ended, in that it doesn't say only these things are acceptable, or list what isn't acceptable. Should have “or” after each bullet.

Criterion g) would this apply inside or outside settlement boundaries, or both?

It is not clear what policy approach is intended to apply to “intermediate” areas as prescribed by criterion a)?

Q50: Do you agree that this policy will protect and restore natural places? (Policy 32: Natural places).

What are “regionally” valued natural assets? A&B is the second largest authority and these are referred to as Local. Who would determine “regionally” valued assets?

Criterion i.) suggest in last bullet point, inserting “acceptably” before “minimises”.

Q51: Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands? (Policy 33: Peat and carbon rich soils)

Again what is “regionally” and who would designate them”? Also, how does our EU withdrawal and transition arrangements effect reference to “internationally” valued soils?

Criterion c) needs to define what is meant by “peatland”, ie,. Is it category 1 and 2, deep peat, or all peat.

Where reference is made to peatland management plans, this also should define what identification on site of “peat” means.

Q52: Do you agree that this policy will expand woodland cover and protect existing woodland? (Policy 34: Trees, woodland and forestry).

Criterion a) It is not clear what is meant by identify, but to map this would be beyond our resources and severely impact on our ability to produce an LDP in the proposed timeframes. It is appropriate to have a policy framework which protects without actually identifying all relevant woodland. The second sentence of criterion a) is unclear. How are the LDP and FWS "associated"? Planning cannot manage woodland felling if there is no associated development. This is why all of these elements go in the FWS which needs to be prepared in conjunction with Scottish Forestry and other partners. The document “The Right Tree in the Right Place” needs to be refreshed as it still refers to Supplementary Guidance throughout.

Criterion b) first bullet, should allow for loss of ancient woodland where the woodland is not compromised or benefit outweighs the impact.

Criterion c): The first sentence is too restrictive. Compensatory planting should be funded by the developer and demonstrate how it benefits the community impacted by the lost trees.

Criterion e) the criterion implies if trees are planted, developments will be supported.

There is no mention of TPOs and trees in Conservation Areas.

Q53: Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities? Policy 35: Coasts

Criterion b) define coastal location.

Criterion c) last sentence, not sure what the aim is. Suggest replacing “a very short lifespan” with “the minimum period necessary for the operation required” or words to that effect.

Criterion d) bullet points, should they have “and” after them so they all apply?

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?

On page 113 under title, Development Plan Policy and Regional Spatial Strategies, there is reference to Scotland’s “regions”, but what are these? It is Local Authorities working together not regions.

In the following paragraph add after “City Region Growth Deals” “Rural Growth Deals”.

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 2007

C) It is not clear that the proposed NPF4 content will increase population in rural areas. It has the potential to assist Local Authorities to facilitate development which may support population increase, but it is investment of capital in jobs, transport and economic opportunities which will actually increase population levels. This requires Scottish Government investment and implementation of other policy including fiscal policy, to directly align with the aims of the NPF4.



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

Support the proposed numbers, which align with Argyll & Bute HNDA