

Fourth National Planning Framework (NPF4) Consultation Draft: SEStran Response

1 Purpose of Report

- 1.1 This report presents to the Board SEStran's draft response to the [Fourth National Planning Framework for Scotland](#), included at Appendix 1, for consideration and agreement.
- 1.2 Additionally, a draft response to the consultation on the draft [Local Development Planning Regulations and Guidance](#), is provided, which the Board is also asked to consider and agree.

2. Importance of NPF4 and LDP guidance for RTS

- 2.1 NPF4 sets out a long-term spatial planning framework for Scotland up to 2045. It confirms housing targets for local authority areas, and it sets out overarching planning policies, thus providing a critical policy reference for Development Planning at the local level.
- 2.2 Previous reports to the Board highlight the importance of NPF4 and the Planning Act (Scotland) 2019 as context to SEStran's new Regional Transport Strategy (RTS) to 2035. Like the Second National Transport Strategy (NTS2), NPF4's planning policy outcomes are underpinned by the national target of net zero carbon emissions in Scotland by 2045 and aims to deliver inclusive economic growth.
- 2.3 The re-structured planning policy environment of NPF4 has removed the statutory requirement for a Strategic Development Plan. Instead, non-statutory Regional Spatial Strategies are incorporated within NPF4's national vision. Local planning authorities will refer to NPF4 in strategic decisions on land use.
- 2.4 The consultation on NPF4's policies, developments and vision includes 53 questions. SEStran's response addresses only those questions that are relevant, and responses provide a regional perspective on the need for planners to be able to quantify and understand the cumulative transport impacts of significant population growth, housebuilding and towns expansion in the SEStran area, and make sufficient reference the RTS. The challenges of delivering the National Walking, Cycling and Wheeling Network, National Development on the ground are also highlighted.
- 2.5 The new draft Local Development Plan Guidance consultation is also of significant interest from a Regional Transport Partnership perspective. The Guidance provides secondary legislative requirements and guidance for all stakeholders on future local development planning. The Guidance sets out how Local Plans should be developed, with reference to the extent to which transport considerations should be involved in a local

development planning process. SEStran's draft response to this consultation, included at Appendix 2, addresses only those questions that are appropriate or relevant to considerations of a Regional Transport Partnership / SEStran.

- 2.6 SEStran has consistently advocated for the importance of strategic planning decisions being taken in the context of appraised transport needs. An understanding of the accessibility, availability and suitability of transport options, as well as a much closer alignment between regional transport and land use planning functions is necessary to help achieve national targets, and SEStran's responses to both consultations pick up on this theme.

3. Recommendations

3.1 The Board is asked to agree:-

- i) The draft responses to NPF4 Consultation, at Appendix 1, for submission through the Scottish Government's online survey, by the closing date of 31 March 2022;
- ii) The draft response to Local Development Plan Guidance consultation at Appendix 2, for submission through the Scottish Government's online survey, by the closing date of 31 March 2022.

Anna Herriman
Senior Partnership Manager
March 2022

Appendices:

Appendix 1: SEStran responses to NPF4 Consultation – March 2022

Appendix 2: SEStran response to Local Development Plan Guidance – March 2022

Policy Implications	<p>The emerging NPF4 has significant policy implications for the context and delivery of the Regional Transport Strategy.</p> <p>SEStran has considered the draft response to NPF4 by the Edinburgh and South East of Scotland City Region Deal, which identifies the need to refer to the SEStran RTS.</p>
Financial Implications	<p>There are no direct financial implications arising from this report</p>
Equalities Implications	<p>There are no direct equalities implications for SEStran that arise from this report, however the likely impact of NPF4 in mitigating the worst of car dependent communities and areas of new development may lead to increasing transport</p>

	inequity in the region and this is a focus of the response.
Climate Change Implications	There are no direct negative impacts for the climate arising from the NPF4 report or SEStran's response to it.

APPENDIX 1

SCOTTISH GOVERNMENT CONSULTATION: SCOTLAND'S FOURTH NATIONAL PLANNING FRAMEWORK (NPF4)

DRAFT CONSULTATION RESPONSES

Some questions relate to geographical areas or are not transport specific. These question have been omitted and only the responses to be submitted are given below.

Q1. Sustainable Places	
Sustainable Places 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?	
	<p>The principles and aspirations for a strategy which transform how we use land and buildings appears to be the right one but it is hard to know how it will translate into the actual future net zero places. Current planning strategy and policy has had little impact on a market-led development sector for example, so perhaps the legislative changes that will support this approach need to be outlined.</p> <p>How reducing the need to travel can be delivered is the most challenging element of this approach. Larger scale development has the potential to deliver local sustainable travel options but how links are identified and delivered to adjacent and other areas and also the existing land use patterns for services, employment etc are key to providing wider connected sustainable networks.</p> <p>Existing land use patterns will continue to influence the need to travel and available modes of travel. Delivery of wider sustainable accessible networks is the key to success. How NPF4 will deliver this is unclear. There is no clarity in the framework as to how the objectives in Q1 can be achieved for existing places.</p> <p>There is room for ignorance of redevelopment/adaptation in favour of new development practices attaining the highest standard. Existing developments, especially high density need to be considered in a way that may mean some element of CPO to provide the right type of amenity for all.</p>
Q2. Liveable Places	
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?	
	<p><i>“Good quality”</i> is subjective term without adherence to the highest possible minimum standard. For example, Glasgow City Council instituted a standard in 2016 which is prescriptive in respect to floorspace and accommodates for housing for all users. Outside of this it can be dependent on the social landlord as floorspace is not a substantive planning condition.</p> <p>Generally, the emphasis is on walking which makes some sense. However, new housing developments generally don't provide adequate space inside or outside for secure and easy to access cycle storage - thus discouraging this mode. Is policy 10 l) strong enough to deliver improved cycle parking in development? The direction <i>“should consider”</i> and <i>“sheltered where possible”</i> make it easier to avoid provisions. They must be provided unless a valid reason prevents it.</p>

	Clarity on the delivery of essential infrastructure needed to support and integrate existing development into 20 minute neighbourhoods is required. The infrastructure first approach is supported but it is not clear how this will be secured and operated in practice.
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Q3. Productive Places

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?

	<p>In principle yes. However, urban and rural connectivity needs are different, so the planning system needs to be flexible enough to cater for this. The likely need to travel longer distances to access services in the "20 minute" time period for rural areas needs to be fully reflected in NPF4. Perhaps the reference should be to sustainably accessible neighbourhoods.</p> <p>How will the planning system ensure that the most critical local facilities are provided and can be sustainably accessed within neighbourhoods? Many examples exist of housing development where sites are reserved for local facilities, but no one is willing to provide them or run businesses from them.</p> <p>Will there be guidance on what constitutes a neighbourhood?</p> <p>It will also be vital to ensure linkages and alignment across other strategies and frameworks including those on economic growth, climate change and transport. Building jobs where most needed doesn't negate the possibility of increased travel unless there is a specific education ask to upskill workers in that area to the new work.</p>
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Q4. Distinctive Places

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?

	<p>Larger development areas where new facilities and services are provided will benefit from this approach. However, it is how smaller scale development is integrated into the existing land use pattern and how and when better sustainable travel connections are made that will determine overall success, How NPF 4 can deliver these travel improvements and the right development mixes especially where facilities shortfalls exist within existing developments will be the measure of success of how well the desired places can be delivered and it is unclear how NPF4 will achieve this.</p> <p>What is design led, led by who and design for what and how long? Agree with comments on use of driveways and garaging.</p> <p>At a regional level it's the larger out of town developments approved to date that lack mix of use, amenities and connection to bus and active travel routes and shared mobility that is needed for sustainable, liveable and productive places. Its hard to see how the idea can really be applied / delivered - will developers agree to these changes if they aren't commercially favourable? The only example that comes to mind is from the Netherlands where the theory of space for driveways</p>
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	and garages is instead utilised within the footprint of houses - and residential areas are provided with mobility hubs and access to shared mobility.
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Q5.

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

How NPF 4 can support delivery of the right development mixes especially where shortfalls exist within existing developments, will be the measure of success of how well the desired places can be delivered. Distinctive places will only be safe and pleasant if the necessary transport connectivity within the local neighbourhood to encourage active and sustainable travel exists and removes the current car dominance and space given over to cars.

However, achieving this will require robustness in policies which require this and a commitment from all parts of government, including the Planning & Environmental Appeals Division, to ensure that high consistent standards can be achieved through planning processes.

Q6. Spatial Principles

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

Only where there is existing supporting sustainable travel infrastructure available from the outset of new development. Alternatively, the infrastructure can be put in first before development takes place improving existing and supporting new development.

Only if there is adequate amenity to support high density living in the form of nature assets.

How will compact growth be achieved and be delivered if the services don't exist locally and no one will provide them. Planning needs to secure and deliver the infrastructure to support local liveability before it can be promoted through educators.

Enabling more people to live and remain in rural areas without good digital connectivity could lead to in built travel demand unless services are provided locally which will not always be the case. Digital connectivity is key to minimising travel to work. Provide and support sustainable travel options for what employment cannot be done from home. What will be included in neighbourhoods to provide sustainable access.

The spatial principles are good but aspirational. A lot of work is needed to assess what is needed and to develop a strategy, plan and priorities for delivery so these spatial principles can be applied.

It is the combination of both the location and availability of sustainable transport options and services that will determine if the right locational choices have been made.

Q7. Spatial Strategy Action Areas

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Broadly yes. Digital innovation and connectivity is key across all locations to deliver the aims of the spatial strategy. Improving digital connectivity is not new and ambitions for 2020 have been and gone what will differ in the next 8 years to speed that process?

It is important to recognise that the actions are not unique to each action area. For example, the North East Transition Area has a focus on actively planning a just transition from oil and gas to a net zero future. There are of course a significant level of oil and gas related facilities and businesses in the SEStran Region and it is important that the same principles will apply to these businesses. Similarly, the Northern Revitalisation Area has actions looking at digital innovation, and making the best use of natural and cultural heritage. These are, of course, significant issues for the SEStran Region as well.

Q14. Central urban transformation action area

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

In respect of pioneering low-carbon , resilient urban living connected to service must include a reference to connected by public transport options service as well as the need to expand active travel networks

To what extent is the ambition to retrofit infrastructure to improve active travel connections in existing areas. This depends on the availability of space and the strength of the local development plans to challenge and refuse inappropriate development.

Supporting local businesses to provide services, including leisure, active living hospitality and retail is welcomed. But what type of support, who will provide it and how will it be delivered and how long will it be available?

The identification of the need for development to be supported by low carbon transport solution is agreed. There will remain significant cross boundary trips and transport solution (given the current land use and demand patterns. Therefore, there should be reference here to the Regional Transport Strategy and the need for cross boundary transport solutions coordinated and delivered at a regional level.

The lack of inclusion of the mass transit tram extension beyond Edinburgh airport in the City Region Deal, to access Newbridge and proposed development sites shows how important an infrastructure first approach is needed, to deliver sustainable development and how important integrated transport and land use planning is.

Furthermore, the SEStran Strategic Active Travel Network should be referenced in this section as it has a key regional role to play within the national development National Walking, Cycling and Wheeling Network.

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Q15. Central urban transformation action area
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What are your views on these strategic actions for this action area?

	<p>The ability to retrofit facilities into areas depends on the availability of space and the strength of the local development plans to challenge and refuse inappropriate development. To what extent is the ambition to retrofit infrastructure to improve active travel connections included in these actions? Will the National Development, National Walking, Cycling and Wheeling Network deliver this and support the expansion of active travel networks? Connections to services and facilities must consider the role played by public transport in making those connections.</p> <p>Care is needed in respects of the Clyde Coast low-carbon tourism and leisure. Car ferries are essential for local/resident access but facilitate easy car based travel without alternative integrated public transport/ferry incentives for tourism and leisure being in place.</p> <p>Areas which are largely residential and car-based could be diversified by supporting local businesses to provide services including leisure, active living, hospitality and retail is essential for local living but what type of support is proposed, who will provide it and how will it be delivered and managed?</p> <p>There will remain significant cross boundary trips and transport solution (given the current land use and demand patterns.) Therefore, there should have been reference here to the SEStran RTS and the need for cross boundary transport solutions coordinated and delivered at a regional level.</p> <p>Any developer contribution framework must now be developed to cover integrated transport modal interchange and tackle the cross boundary and orbital connectivity issues identified in the RTS . Especially as it relates to orbital Edinburgh movement from outside and within the city.</p> <p>As development based around road corridors is moved away from car based travel to more accessible low carbon accessible areas, what are the new approaches that will be needed and how will NPF 4 and Local Development Plans deliver these.</p> <p>To deliver a wellbeing economy how can communities drive forward housing if land is committed many years in advance with immediate needs causing an immediate response. Someone doesn't wait indefinitely for housing without seeking other options thereby leaving a community.</p> <p>Improved urban accessibility and local living occurs only if planning policies ensure the supporting services and sustainable infrastructure development is delivered in place to support local living. What is timescale for delivery? I assume this is long term as it's a slow and gradual change of current land uses within existing developed areas.</p> <p>Work done by SEStran as part of the RTS development shows that 60% of car commuting in the SEStran area is not related to City of Edinburgh. Therefore, a mass transit system focussed on Edinburgh will not wholly tackle the car</p>
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	<p>commuting problem and does not tackle inter regional trips and some focus on this must be made.</p> <p>There should be reference to the Regional Transport Strategy here as actions must be aligned with the transport needs and requirements to support delivery of these actions.</p>
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Q16. Southern sustainability action area

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

	<p>Public transport services in the rural areas e.g. Scottish Borders are poor because of the current profit based private sector delivery model (buses). The demand is sparse and fixed route services are financially challenging to deliver. A more integrated and connected multi modal system is needed to support local living and sustainable access to longer distance travel needs, linking to the rail system.</p> <p>Again, reference to the transport challenges in the area would be aligned better if reference were made to the Regional Transport Strategy.</p>
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Q17. Southern sustainability action area

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

	<p>The need for improved transport connectivity beyond the borders of the southern sustainability action area is clearly identified in the draft RTS. Transport connectivity goes beyond these boundaries and greater reference is required to the potential for the extension of the Borders Railway and the feasibility work that is already committed and funded through the Borderlands Growth Deal.</p> <p>Longer distance commuter travel demand can be reduced with good digital connectivity, and this should be emphasised more.</p> <p>The actions must deliver and have to ensure that the accompanying services and amenities to support the level of population are delivered. Borders has historical lost large population of 18-35 since 2010 due to lack of service and affordability.</p> <p>Bus services in the Borders are poor because of the current profit based private sector delivery model. The demand is sparse so fixed route service are challenging to deliver.</p>
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Q18.

What are your overall views on this proposed national spatial strategy?

There continues to be an apparent lack of need and reinforcement of the need for integration between NPF4 and the Regional Transport Strategy. The RTS has a key role as a statutory document outlining transport strategy and policy for the south east of Scotland.

However, SEStran is broadly supportive of the national strategy subject to the general points set out in the response to Question 7 and the more detailed points set out in the responses to Questions 14-17.

Questions – 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?

National Walking, Cycling and Wheeling Network

The designation and classes of development should be expanded to include and reference routes for active travel and recreation.

The individual elements that create the National Walking, Cycling and Wheeling Network will generally be shorter than the 8 km distance referred to in 2009 Regulations. If this part of NPF4 is to allow an argument that every piece of individual active travel infrastructure has the highest priority in planning terms because it is part of a national development, then some reference needs to be made to ensure that sections shorter than 8km which form part of a longer section can be referenced as part of the wider network.

This is a key policy to enable the level of change needed to support local and longer distance active travel and sustainable developments within existing and new development areas.

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?

No.

Clearer statement of the need for wider active travel connections to existing services is necessary. This may require improvements to existing infrastructure beyond the immediate development site. The ability to deliver this type of improvement may be hindered by the developer contributions policy so the connection the national development is vital to justify the planning need for improvement and provision.

Q21.

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

Greater reference is required to the potential for the extension of the Borders Railway and the feasibility work that is already committed and funded through the Borderlands Growth Deal.

Questions – Part 3: National Planning Policy

Q22.

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

The SEStran Partnership agrees that addressing climate change and nature recovery should be the guiding principle for plans and planning decisions within a context of supporting development which minimises the need for travel.

Q23.

Policy 1: *Plan led approach to sustainable development*
Do you agree with this policy approach?

It is of vital importance that the integration of transport and land use planning is fully recognised in the plan led approach to sustainable development. Therefore, reference to the need for LDP's to align with Regional Transport Strategies is a fundamental requirement when developing LDPs and making decisions on development locations.

Greater reference to the Regional Transport Strategies in NPF4 is necessary as this is the primary planning document that leads and guides LDPs..

Q24.

Policy 2: *Climate emergency*

Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

The policy itself will not achieve this aim and will require other interventions. Nevertheless, the partnership supports the overall objectives of the policy.

Using of indeterminate terminology such as "significant emissions" gives no guidance as to what would be considered as a significant emission. NPF4 must take the opportunity to bring a consistent definition or there will continue to be a lack of consistency in assessing the impact of proposals.

Q29.

Policy 7: *Local living*

Do you agree that this policy sufficiently addresses the need to support local living?

The principle of local living is supported but there are practical and deliverability issues to achieve this policy aim. How this is delivered with applications on the ground is key.

	<p>The need to make better overall connections is identified by requiring that: the level of interconnectivity with the surrounding neighbourhood is key and that proposals should demonstrate how the development will relate to, and enhance, the local area. However, improvement may be needed outwith the boundaries of the development to meet the sustainable aspirations of NPF4 and NTS2. Some improvement will only be delivered and integrated into the development if they are seen to meet the wider need of delivering the National Walking, Cycling and Wheeling Network.</p> <p>Therefore, local development plans need to have a developed set of proposals and identify where connectivity improvements are needed to deliver the National Walking, Cycling and Wheeling Network.</p>
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Q30.

Policy 8: Infrastructure First

Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure first approach to planning?

	<p>It is not clear how this policy will deliver strategically necessary infrastructure first.</p> <p>It is important that where infrastructure is required to support development that it can be funded and delivered. The importance of ensuring that full weight of the National Development National Walking, Cycling and Wheeling Network can be applied to ensure adequate active and sustainable connection cannot be underestimated.</p> <p>Experience has demonstrated securing funding and contribution for infrastructure is challenging. The 'tests', particularly those concerning the relevance of infrastructure to the development to be permitted, can be difficult to satisfy. If it is the Scottish Government's aspiration to put infrastructure considerations at the heart of place making as stated then it is suggested that a review of Circular 3/2012 will be required. The partnership notes an intention to review the approach to developer obligations but considers that this review needs to be carried out in parallel with the preparation of NPF4 rather than after NPF4 has been approved.</p> <p>There must a reference RTS's as key statutory documents.</p>
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Q32.

Policy 10: Sustainable transport

Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

	<p>The policy is generally supported subject to the comments made below.</p> <p>It is noted that there is more explicit requirement for new local development plans to be suitably informed by an appropriate and effective transport appraisal.</p> <p>Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) does not fully reflect the range of factors now considered important outcomes and priorities of the NTS2 such as "Reduce Inequalities" and "Improves Our Health and Wellbeing".</p>
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	<p>There will be significantly more evidence needed to provide support for an application and development of a LDP. There is a need for better local guidance on what must be submitted with a planning application to cover all the transportation assessment needs of the development. There is an urgent need to update this guidance and to recognise that in rural areas 400m distances to local facilities will not always be achievable.</p>
	<p>There will be significantly more evidence needed to provide support for an application and development of a LDP. There is a need for better local guidance on what must be submitted with a planning application to cover all the transportation assessment needs of the development. There is an urgent need to update this guidance and to recognise that in rural areas 400m distances to local facilities will not always be achievable.</p> <p>There are resource implications for Local Authorities with this approach.</p>

Questions – Part 4: Delivering Our Spatial Strategy

Q54.	
Do you agree with our proposed priorities for the delivery of the spatial strategy?	
	<p>It is clear from Part 4 of NPF4 that much work remains to be done to ensure that NPF4 is aligned to other strategies, and that its policies are effective in achieving the overall aims</p> <p>It is the alignment in funding commitments across land use, transportation and economic strategies that will be needed to support the delivery of NPF4. In particular to deliver the stated priority of plan led development sytem focussed on an Infrastructure First delivery approach.</p>

Q55.	
Do you have any other comments on the delivery of the spatial strategy?	
	No

Questions – Part 5: Annexes

Questions – Integrate Impact Assessments

Environmental Report

Q59.	
What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?	
	No comment

Business and Regulatory Impact Assessment

Q70.	
Do you have any comments on the partial business and regulatory impact assessment?	
	No comment

SEStran Responses to Questions in the Local Development Plan Guidance consultation

Question 1

Do you agree with the principle that regulations be kept to the minimum necessary and that more detail be provided in guidance and kept updated?

No

Please explain why you agree or disagree.

The practical advantages of using guidance rather than regulations is appreciated. However, given the differing legal status of the two, it is important that the guidance is clear and unambiguous. Further, using guidance should not be simply a means of avoiding Parliamentary scrutiny of important issues.

Planning professionals and others need to be clear about the interrelationship between the Act, the regulations, and the guidance, and there are some aspects which require to have the force of law. The guidance is likely to be the first point of contact for non-lawyers and therefore will play a crucial role in weaving together the three sources of information into a coherent whole by means of proper explanation and cross-reference where necessary.

Question 2

i) Do you have any views on the content of the interim assessments?

No

Please explain your views

ii) Do you have or can you direct us to any information that would assist in finalising these assessments?

No

Question 3

i) Do you have any views on the Fairer Scotland Duty and Strategic Environmental Assessment screening documents?

No

Question 4

Do you agree with the proposals for regulations relating to the form and content of LDPs?

No

Please explain why you agree or disagree.

The regulations should contain provisions to the following effect: 'the local development plan is to contain a statement of how the proposed development will integrate with existing and planned transportation needs for the district, and, in

particular, how it will contribute to diminishing private car use and increasing the use of public transport and active travel modes.'

Question 5

Do you agree with the proposals for regulations relating to the preparation and monitoring of LDPs?

Yes

Please explain why you agree or disagree

This seems an appropriate and proportionate way of dealing with consequential changes.

Question 6

Do you have views on additional information and considerations to have regard to when preparing and monitoring LDPs?

Yes

Please explain your views.

Regulation 8 appears to be an appropriate place to reference both the National Planning Framework and the National Transport Strategy.

Question 7

Do you agree with the proposals for regulations relating to the Evidence Report?

No View

Question 8

Do you agree with the proposals for regulations relating to the preparation and publication of the LDP?

No View

Guidance should make clear the need to consult, and have regard to, regional transport partnerships and the relevant RTS/NTS at every stage of preparation of the LDP.

Question 9

Do you agree with the proposals for regulations relating to the examination of the LDP?

No View

Are there matters you wish to highlight relating to amendment of the LDP which may have bearing on the proposals for regulations being consulted on in this document?

Yes

Please explain your view.

Any proposed amendment of the LDP should include the need to consult, and have regard to, regional transport partnerships and the relevant RTS/NTS at every stage of preparation of the LDP.

Question 10

Are there matters you wish to highlight relating to amendment of the LDP which may have bearing on the proposals for regulations being consulted on in this document?

No View

Question 11

Do you agree with the proposals for regulations relating to Development Plan Schemes?

No View

Question 12

Do you agree with the proposals for regulations relating to Delivery Programmes?

No

Please explain why you agree or disagree.

Regional Transport Partnerships may not be specified in the Delivery Programme but should still be consulted.

Question 13

Do you agree with the proposals for regulations relating to the meaning of 'key agency'?

Yes

Question 14

Do you agree with the proposals for regulations relating to transitional provisions?

No View

Question 15

Do you agree with the general guidance on Local Development Plans?

No

Please explain why you agree or disagree

Although in general the general guidance is clear and well set out, the suggestion that LDPs should take 3 – 4 years to prepare should be reconsidered. LDP processes are in general far too long and complex. Members of the public lose sight of where the LDP is, and development management decisions are made more

difficult while acting under the shadow of the 'emerging' development plan in its various stages.

Question 16

Do you agree with the guidance on Development Plan Schemes?

Yes

Question 17

Do you agree with the guidance on the Delivery Programme?

No

Please explain why you agree or disagree.

The guidance should be strengthened to make it clear that full engagement, rather than consultation, is needed to bring clarity to a Delivery Programme, especially in areas such as transport where the expertise in councils lies elsewhere than in the Planning Service. Transport infrastructure – including, for example, the design of future public transport systems to service new developments – needs to be fully thought through in partnership with transportation planners both in the council and at RTP level.

The Delivery Programme needs to align closely with measures identified in the LTS and RTS and may even have to have proper regard to the STPR proposals.

The guidance should also make mention of wider policy objectives such as the twenty minute neighbourhood.

Question 18

Do you agree with the guidance on Local Place Plans?

No

Please explain why you agree or disagree.

Again mention should be made of the need to address transportation issues when consulting with the community about the content of any LPP proposed by them, as this is often a key issue for local communities. Planning authorities need to take a holistic approach – and guide communities towards doing the same in any LPP proposal.

Question 19

Do you agree with the guidance on the Evidence Report?

No

Please explain why you agree or disagree.

There is not enough emphasis on transportation issues being key elements of the Evidence Report. The list at para 107, for example, should include the LTS and RTS.

Question 20

Do you agree with the guidance on the Gate Check?

Yes

Question 21

Do you agree with the guidance on the Proposed Plan?

Yes

Please explain why you agree or disagree.

Question 22

Do you agree with the guidance on Local Development Plan Examinations?

Yes

Please explain why you agree or disagree.

The current system seems to work reasonably well. However, Scottish Ministers and councils should work together to streamline any examination process as much as possible, whilst also maximising the opportunity for the public to take part.

Question 23

Do you agree with the guidance on Adoption and Delivery?

Yes

Question 24

Do you agree with the proposed guidance on the Evidence Report in relation to the section on Sustainable Places (paragraphs 240 – 247)?

Yes

Question 25

Do you agree with the proposed guidance on the Evidence Report in relation to the section on Liveable Places (paragraphs 248 – 283)?

No

Please explain why you agree or disagree.

In general this indicates how transport authorities and RTPs should be engaged in this process. However, there should also be a section indicating that new technologies are introducing new modes of transport (e-bikes, car club, Digital Demand Responsive Transport etc. as well as e-car charging requirements) and that planning authorities need to be aware of, and responsive to, such developments.

Question 26

Do you agree with the proposed guidance on the Evidence Report in relation to the section on Productive Places (paragraphs 284 – 296)?

Yes

Question 27

Do you agree with the proposed guidance on the Evidence Report in relation to the section on Distinctive Places (paragraphs 297 – 310)?

No

Please explain why you agree or disagree.

The guidance appears to take no account of the policy ambition for greater community ownership encapsulated by the provisions of the Community Empowerment (Scotland) Act 2015. This might be an appropriate place to recommend that LDPs identify potential community uses of vacant public buildings by community groups, and give guidance as to how that might be delivered. Town centres are important travel hubs and recognition of this might be best placed in this section.

Question 28

Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Sustainable Places (paragraphs 317 – 328)?

Yes

Question 29

Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Liveable Places (paragraphs 329 – 400)?

No

Please explain why you agree or disagree.

Although in general well written, there are a couple of areas where this section could be improved:

There should be mention of Regional Transport Strategies and, potentially, the impact of the STPR; this might be best placed at paragraph 358;

This section is perhaps the appropriate place to include reference to the Bus Partnership Fund and the need to recognise the wealth of bus priority measures which will be introduced across the country in the next 5 years by Bus Service Improvement Partnerships.

Question 30

Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Productive Places (paragraphs 401 – 424)?

No

Please explain why you agree or disagree.

Again it would be a good place to refer to emerging technology solutions to common transport issues.

Question 31

Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Distinctive Places (paragraphs 425 – 466)?

Data Label: Public

No

Please explain why you agree or disagree.

This would be a good place to insert a requirement to consider how travel hubs can be located.

Question 32

Do you agree with the proposed thematic guidance on the Delivery Programme (paragraphs 467 – 482)?

No

In the Sustainable Transport and Travel section, reference should be made to the RTS.