

Appendix 1

Questions

Question	Council Response
<p>1. Do you agree with our current thinking on planning for net-zero emissions?</p>	<p>The Council welcomes the broad range of proposals emerging from the NPF4 Position Statement in relation to thinking on planning for net zero emissions. Moray Council's indicative Regional Spatial Strategy took a similar very wide ranging approach, recognising the role the planning system has to play in reducing emissions, covering both urban issues such as re-use of brownfield sites, walkable neighbourhoods, reducing the need to travel and rural issues such as digital roll-out, woodland planting, peatland restoration and renewable energy generation. References to policy and delivery of hydrogen technology and the decarbonisation of industry could be stronger. The focus on planning places to reduce the need to travel is very welcome and supports the proposals on 20 minute neighbourhoods and community hubs.</p> <p>It is clear that the greater focus upon delivery which the new planning system will have going forward will need to be resourced with the necessary finance, staffing and skill sets/ training and further consideration is required on this. Taking brownfield development as an example, these sites are often constrained and require additional finance and staff time to resolve these constraints in order for the site to come forward for development, Until additional resources are available to make the site viable, development to meet our needs will continue to be focussed elsewhere.</p> <p>The Council considers that further thought is required with regard to;</p> <ul style="list-style-type: none"> • The proposals regarding policies to reduce emissions in new development are similar to what the Scottish Government has introduced in recent Local Development Plans, however, the key is to have a process which is understood and can be consistently applied across all planning authorities. • Updating the spatial framework for onshore wind farms to continue to protect National Scenic Areas and National Parks whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site specific assessments- this proposal fails to address previous concerns regarding the limitations of the current approach which provides no certainty to developers or communities. It also fails to recognise that in Scotland there are a number of landscapes where cumulative impacts are a very significant concern. Taking account of the emerging NatureScot landscape sensitivity studies, a new approach should be possible which provides a true reflection of opportunities for repowering and extension of wind farms, respects regional/ local landscapes and a mixture of land

	<p>uses and technologies. The current spatial framework required to comply with SPP results in just under 40% of Moray being identified as having potential for wind energy. This level of guidance then has an effect upon the consenting processes leading to extensive delays in advancing opportunities for renewable energy to be deployed.</p>
<p>2. Do you agree with our current thinking on planning for resilient communities?</p>	<p>Yes, although aspects of the 20 minute neighbourhoods concept are not new, applying this more widely and consistently is welcomed. However, along with other welcome changes, particularly regarding quality placemaking, this needs to be supported by the Scottish Government and appointed Reporters in the event of appeals. Applying this to existing places is also welcome, but will require resourcing for actions such as redevelopment of vacant sites, improvement of green spaces and new active travel connections. Clear guidance as to what criteria are to be applied in considering 20 minute neighbourhoods will be required.</p> <p>The infrastructure first approach is also very welcome and something Moray Council has been endeavouring to begin through the preparation of the MLDP2020. This needs buy in from all infrastructure providers to ensure this is properly planned and resourced. The discussions on the potential infrastructure levy and capture of land value uplift also need to be advanced to understand how infrastructure can be planned and funded in future.</p> <p>Supporting implementation of the six public health priorities is very welcome, the Council supports strong policy wording to reflect this and refer the Scottish Government to policy PP1 of the MLDP2020. Similarly the focus on quality placemaking is welcomed and Moray Council's policy PP1 is referenced as a good example.</p> <p>The new approach to planning for housing land is also welcomed with a more flexible approach to release of land. This sounds similar to the LONG term approach Moray Council has operated since 2008, with a series of triggers being considered before release of additional land. The support for this approach from the housebuilding industry could result in benefits and a reduction in the often, protracted housing land debates at LDP Examination stage.</p> <p>Policies to deliver accessible housing in the private sector in single storey format are also required to ensure that there is a choice of tenure available for people requiring accessible housing, reflecting our ageing population. The policy within the MLDP2020 requiring this provision was removed by the Reporter.</p>
<p>3. Do you agree with our current thinking on planning for a well-being economy?</p>	<p>The statement that "we will support" development in the parts of Scotland where quality jobs are most needed" and "policies will refocus on community wealth building and sustainability" are welcomed, given Moray's low wage economy. Moray Council will</p>

	<p>shortly be progressing work on a Community Wealth Building Strategy.</p> <p>In terms of attracting inward investment and ensuring a serviced supply of employment land is available, this is a real viability challenge and additional resources and new ways of working need to be explored. In Moray, a long standing issue regarding the shortage of employment land has been addressed through large new designations in the MLDP2020, however, to bring these sites forward for development relies upon the private sector, due to public sector resource issues.</p> <p>The proposals to grow the food and drink sector are very welcome as is the recognition of the importance of agricultural land. The proposals to support sustainable tourism development support the approach in the Moray iRSS, as does the proposal to stimulate culture and the creative industries which the Moray Growth Deal Cultural Quarter project ties in with.</p> <p>The proposal that “we will not plan infrastructure to cater for forecast unconstrained increases in traffic volumes. Instead we will manage demand and reduce the need to travel by unsustainable modes” will require significant changes to where, how we work, live and spend leisure time and will need to be supported by a massive investment in active travel and public transport. Clarification is required of what constitutes “unnecessary travel”.</p>
<p>4. Do you agree with our current thinking on planning for better, greener places?</p>	<p>The proposals are welcomed. As noted earlier in this response the focus on better quality design and placemaking, reusing brownfield vacant and derelict brownfield sites are all welcome, but need to be resourced. The Moray Growth Deal Housing Mix Delivery project is a good example of a targeted approach to redevelop constrained sites and deliver multi benefit developments.</p> <p>Looking ahead to 2050, perhaps there should be stronger references made in NPF4 and the iRSS to areas which may need to be redeveloped to meet the range of aspirations set out in the Position Statement, again these redevelopment opportunities will need to be resourced to provide 20 minute neighbourhoods, with quality, energy efficient housing, open spaces, active travel networks and local services.</p> <p>Greater referencing needs to be made to the potential for significant woodland expansion, balanced with other land uses and biodiversity issues and a national spatial framework identifying key opportunities could be included, along with targeted areas for peatland restoration.</p> <p>Greater referencing is also required on landscape issues and the need to safeguard national and local landscape designations, with the value of some landscapes being eroded by cumulative developments. An update of wildness mapping should also be</p>

	<p>undertaken as a priority and compared to the previous mapping to understand how quickly wildness qualities are compromised by often inappropriately sited development.</p> <p>Stronger, standalone policies on biodiversity are required such as Moray Council's policies PP1 and EP2.</p>
<p>5. Do you have further suggestions on how we can deliver our strategy?</p>	<p>Delivering the strategy will require close working with planning authorities, the development industry, key stakeholders and communities. It will also require a delivery plan and resourcing at national and local level. Challenge funds/ grant processes are unlikely to bring the changes required.</p> <p>If planning is to be a key agent of change then planning authorities throughout the country need to be resourced to deliver NPF4, RSS and LDP, which collectively deliver many aspects of the 4 key outcomes set out in the Position Statement.</p> <p>Co-ordinated, infrastructure planning will be a key part of the new Gatecheck and Evidence Report requirements and further guidance on the scope and content of these requirements is anticipated. The buy in from infrastructure providers will be key to the success of this approach.</p> <p>Masterplan consent areas, along with streamlined compulsory purchase powers could be very powerful tools to ensure land is available and released to meet demand.</p> <p>Quality auditing such as the process implemented by Moray Council can raise the quality of design in new developments and a review of the Planning Performance Framework to build "quality" outcomes into the evaluation is required.</p> <p>As noted earlier in this response, the review of developer obligations, the role of viability assessments and land value uplift capture are eagerly awaited.</p>
<p>6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?</p>	<p>No.</p>
<p>7. Do you have any other comments on the content of the Position Statement?</p>	<p>No, other than to re-iterate that the Council welcomes the Position Statement and many aspects of the direction of travel set out. Some concerns are highlighted in this response which Council officer would be happy to discuss further with Scottish Government officers.</p>