

## Response ID ANON-2A4V-SZ72-K

Submitted to Development plan amendment regulations: consultation  
Submitted on 2024-05-17 14:43:04

### Amendments to National Planning Framework: full review requirements

1 To what extent do you agree that it is appropriate to adopt a broad and high-level approach as to when a full review of the National Planning Framework is required? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

Agree generally with taking a broad and high-level approach as to when a full review is required in order to provide certainty in the planning system. The Council welcomes the proposal to make the amendment process more responsive and streamlined version of the full review process, whilst balancing the need for due process, including appropriate justification and consultation on the proposed amendment. We note that NPF4 can be amended at any time but that there is a desire to use this sparingly.

2 In cases where amendments would require changes to half or more of the contents of the National Planning Framework (NPF), to what extent do you agree that a full review of the NPF would be required? Where applicable, please give reasons for your answer.

Disagree

Please give us your views:

Generally, if more than half of NPF4 needs changing then a full review makes sense. However, it is noted that some policies and national developments are more significant than others and it could be the case that altering less than half of NPF4 has a significant bearing on the overall policy direction and delivery of NPF4. For example, a major change to Policies 1 through to 3 could well have a major knock on impact on the other policies. The local impact of policies also requires consideration. If for example some of the proposed change to policy themes specifically applied to Glasgow or say National Developments were removed (such as Clyde Mission/Metro) – this may have a disproportionate impact on society/economics of the city. Furthermore – our approach to CDP2 is on the early premise of landing NPF4 locally in a way that it works for Glasgow. If mid cycle the Scottish Government seek a pretty significant change to the system (but less than half of policies/national developments so not requiring a full review) then this would have impacts for our LDP Process too. Rather than simplifying things these arbitrary triggers might cause further uncertainty and additional loss of faith in the planning system. A sustained period of planning normality is required to set out our new style LDPs and provide some certainty for the sake of being able to deliver the 2019 Act and for the economy/environment/communities.

Incremental change where one or a few changes at a time that would eventually lead to half or more of NPF4 being changed needs consideration. Would there be a trigger mechanism if this threshold was reached.

### Amendments to National Planning Framework: engagement and preparation

3 In preparing an amendment to the National Planning Framework (NPF), to what extent do you agree that the Scottish Ministers should have the same considerations as they would for a full review of the NPF, where that is relevant to the proposed amendment? Where applicable, please give reasons for your answer.

Agree

Please give us your views :

No comments

4 To what extent do you agree with the list of those the Scottish Ministers should consult with on a proposed amendment? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

We would expect Planning Authorities to be consulted given they are required to implement NPF4. Overall the approach seems proportionate. The Public at Large could include the development industry and equalities groups.

5 To what extent do you agree that a copy of the proposed amendment should be laid in the Scottish Parliament during the consultation period? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

No comments

6 To what extent do you agree with the proposed minimum 6 week consultation period, understanding that the timescale may be extended when deemed appropriate given the significance and nature of the amendment?Where applicable, please give reasons for your answer

Disagree

Please give us your views:

Whilst the Council agrees with a proportionate approach to amendments in general, it is considered that the consultation period should be longer as any amendment could have a significant impact. If changes are significant or potentially significant in a Glasgow context we would expect most stakeholders in the planning system will require a longer period to prepare a considered response, allow for a reasonable period of public scrutiny and allow comprehensive responses.

#### Amendments to National Planning Framework: adoption

7 To what extent do you agree that the Scottish Ministers be required to publish an Explanatory Report before the amended National Planning Framework is adopted? Where applicable, please give reasons for your answer

Agree

Please give us your views:

Yes agree this is required for transparency of the planning system.

8 To what extent do you agree that all amendments to the National Performance Framework should have to be approved by a resolution of the Scottish Parliament? Where applicable, please give reasons for your answer

Agree

Please give us your views:

It is important that there is confidence in NPF4 and a robust process will ensure confidence.

9 To what extent do you agree that the amended National Planning Framework should take effect when it has been adopted by Scottish Ministers?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

No comments

10 To what extent do you agree that the full updated version of the amended National Planning Framework, incorporating the amendment, should be published as soon as practicable after it has been adopted by Scottish Ministers?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

A fully amended document is required for simplicity and ease of use.

#### Amendments to Local Development Plans: preparation and considerations

11 To what extent do you agree that planning authorities should be required to have regard to community engagement guidance issued by the Scottish Ministers under section 16C when amending a Local Development Plan? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

Agree, similar community engagement requirements are needed for an amendment as there are in place for a full review in order for there to be confidence in the amendment. Amendments need to have equal status for decision making and should therefore be subject to a robust process. With regards the circumstances for an amendment, the threshold needs consideration in producing an update to the LDP Guidance. It would be useful if the circumstances for an amendment were consulted on. In a city context with a large population there will for example be regular new policy issues arising and multiple Local Place Plans may come forward. Further detail is required on the expectation as to when amendments are made. More guidance is required relating to amendments regarding housing land given the potentially significant impact of this. Guidance should also cover when an amendment is required and when planning guidance could be produced instead. This would assist in reducing requests for amendments and potential resource implications.

12 To what extent do you agree that planning authorities should be required to provide a statement outlining how they intend to engage with stakeholders on an amendment to a Local Development Plan? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

It is important to ensure that the Development Plan Scheme reflects the full LDP process including amendments and is a complete source of information for the public and stakeholders.

13 To what extent do you agree that not every amendment to a Local Development Plan should require specific participation of children and young people? Where applicable, please give reasons for your answer.

Neutral

Please give us your views:

Agree with rationale set out. It is noted that work on the Play Sufficiency Assessment should result in a process which allows appropriate engagement and involvement if we need to update / amend an LDP.

14 To what extent do you agree that, when preparing an amendment, a planning authority must have regard to the information and considerations set out in regulation 9 of the Town and Country Planning (Scotland)(Development Planning) regulations 2023? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

The approach seems reasonable and sensible, these are key considerations.

#### Amendments to Local Development Plans: justification

15 To what extent do you agree that an authority should be required to collate relevant evidence to inform the proposed amendment and prepare a Justification of Amendment Statement?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

This is essential, particularly if there is no Evidence Report and Gatecheck. Overall we need to ensure confidence in the amendment and robust procedures will provide confidence. Amendments need to have equal status for decision making and should therefore be subject to a robust process.

16 To what extent do you agree that a Play Sufficiency Assessment should not be required for an amendment to a Local Development Plan? Where applicable, please give reasons for your answer.

Agree

Please give us your views:

Agree, unless the proposed amendment relates to open space provision or any impact on play space or ability to play informally.

17 To what extent do you agree that an authority should not be required to have regard to the self-build list for every amendment to a Local Development Plan?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

Agree, unless amendment is housing related and impacted on any identified opportunities for self-build.

#### Amendment to Local Development Plans: consultation

18 To what extent do you agree that approval by the full council is not always required before the publication of a proposed amendment to a Local Development Plan for consultation?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

Agreed, particularly helpful for GCC given committee set up. In the context of GCC then the City Administration Committee is the decision-making committee for GCC business not Full Council. The amendment should be subject to Elected Member decision making – given the amendment will be used

at Planning Board, Elected Members need to understand changes.

19 To what extent do you agree that the proposed amendment to a Local Development Plan should be published for consultation, alongside the Justification of Amendment statement and any statement on the consequences for the Delivery Programme which are to be published for information?Where applicable, please give reasons for your answer

Agree

Please give us your views:

Agree, seems a proportionate approach.

20 To what extent do you agree that planning authorities should be required to notify Scottish Ministers and to consult with the public at large and key agencies, alongside others they consider appropriate, when amending a Local Development Plan?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

Agree, similar community engagement requirements are needed for an amendment as there are in place for a full review in order for there to be confidence in the amendment. Amendments need to have equal status for decision making and should therefore be subject to a robust process.

21 To what extent do you agree with the proposed minimum 6 weeks consultation period, understanding that the timescale may be extended when deemed appropriate given the scale of the amendment?Where applicable, please give reasons for your answer.

Disagree

Please give us your views:

Whilst the Council agrees with a proportionate approach to amendments in general, it is considered that the consultation period should be longer as any amendment could have a significant impact. If changes are significant or complex, we would expect most stakeholders in the planning system will require a longer period to prepare a considered response, allow for a reasonable period of public scrutiny and allow comprehensive responses. A 6-week consultation relies on there having been sufficient and effective community engagement as the amendment has been scoped and developed.

#### Amendment to Local Development Plans: adoption

22 To what extent do you agree with our proposed approach to independent examination? Where applicable, please give reasons for your answer

Agree

Please give us your views:

The examination is an important part of the process for LDPs and ensuring confidence in the plan, in this case amendment. An amendment needs to have equal status for decision making and so a lack of examination on the amendment would mean the amendment has not been subject to an equal approach. It is agreed that if no representations are received or all representations are agreed with then no examination is required.

23 To what extent do you agree that an amendment to a Local Development Plan should take effect when it is adopted by the planning authority?Where applicable, please give reasons for your answer.

Agree

Please give us your views:

No comments

24 To what extent do you agree that a full, updated version of the amended Local Development Plan (LDP), incorporating the amendment, should be published in the same way as the initial LDP? Where applicable, please give reasons for your answer

Agree

Please give us your views:

A fully amended document is required for simplicity and ease of use.

#### Impact assessments

25 To what extent do you agree with our approach to the impact assessments for the proposed regulations?Where applicable, please give reasons for your answer.

Neutral

Please give us your views:

No comments

## About you

26 What is your name?

Name:

Alison Laurence

27 Are you responding as an individual or an organisation?

Organisation

28 What is your organisation?

Organisation:

Glasgow City Council

29 Further information about your organisation's response

Please add any additional context:

30 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

31 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

32 What is your email address?

Email:

alison.laurence@glasgow.gov.uk

33 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

34 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: