

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

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Dear Sirs

**PROPOSED NPF3 AND POSITION STATEMENT ON SPP CALL FOR VIEWS**

This letter is sent in response to the call for views made by Parliamentary Committees in respect of the publication on **14<sup>th</sup> January 2014** of the draft of the propose Third National Planning Framework, Ambition, Opportunity, Place (NPF3), and the complementary position statement on Scottish Planning Policy (SPP).

It is noted that the deadline for views to be submitted is midday **30<sup>th</sup> January 2014** and that separately evidence has been sought from a variety of bodies such as COSLA, RTPI, HOPS etc on specific questions on both documents and process.

I welcome the opportunity to participate in the call for views. You will appreciate that given the scale, complexity, inter-service and inter-agency nature of the planning of a City such as Glasgow it is not possible to provide full responses in the timescale set. I have therefore outlined the key points of concern that require further articulation to be heard by the Committees in either written, or preferably, oral, evidence.

The Executive Committee of the City Council will also be considering a response at their meeting on 6<sup>th</sup> February and further evidence will be submitted as a result of that meeting.

It would be appropriate for the Committee Clerks to make provision for these submissions and my office will be available to liaise on matters of practicality.

Whilst there is much to be welcomed in the proposed NPF3 and the position statement on SPP there are a number of fundamental areas that I would wish to explore with the Committees. This particularly influenced by the significant change in stance from NPF2, the Main Issues Report and consultations on NPF3 and the finalised draft of NPF3.

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The National Planning Framework should focus on the land use and infrastructure decisions that are needed to deliver on a wide range of policy frameworks that include (this list is not exhaustive)

- Government's Economic Strategy;
- Scotland's Regeneration Strategy;
- Infrastructure Investment Plan;
- National Transport Strategy;
- Land Use Strategy;
- Scottish Cities Alliance Investment Plans;
- Community Planning;
- Town Centre Action Plan.

**It is therefore inconceivable that Glasgow City is not considered a spatial priority for Scotland.**

It is well documented that the current performance of the City, with 16% of jobs that creates 17% of GVA, with only 11% of the population, with acknowledged household growth projected at 28%, continues to grow in significant sectors and contributes to Scotland's prosperity. The challenges that the city faces in scale of vacant and derelict land, the spatial dimension of the gap between those who are most and least advantaged in society, and infrastructure constraints are being tackled through collaborative, innovative and partnership working. A recent report underlined that £6billion investment had come to the City over an 18 month period.

Detailed evidence of the work to deliver on the scale of regeneration and investment in progress, and still required, has been presented to the Local Government and Regeneration Committee during 2013, as part of the Inquiry into the Delivery of Regeneration in Scotland. The latest submission was in December 2013.

Detailed information was submitted that reflected the level of activity, and the dimensions that are of importance to businesses, potential investors, and residents in the City. This demonstrated that over a variety of sectors current completed projects represent a value of £1,358m, projects underway is valued at £3,396m and planned ( those that have been formally announced) £1,268m.

Future ambitions in key areas include those outlined in City Centre Strategy and Action Plan (2014-19); further implementation of Clyde Gateway; collaborative and partnership working with Scottish Canals, Metropolitan Glasgow Strategic Drainage Partnership, GHA, Scottish Government and others in North of the City; and mixed developments in Clyde Waterfront. The momentum for continued investment in these areas should be reflected in the spatial priorities for Scotland.

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The lack of explicit articulation of the role of Glasgow, as a City, and as the key driver in its Metropolitan Region, underplays the contribution that is made by the City to meet the Scottish Governments outcomes for planning by:

- Improving the quality of life and place;
- Enhancing and protecting the natural and historic environment;
- Supporting economic growth and regeneration;
- Developing better transport and digital connections;
- Delivering sustainable development and,
- Making the transition to low carbon economy.

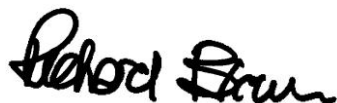
In many of these arenas, the work of the City is considered to be exemplary. The document is therefore weakened by this omission and the City and its partners would wish to provide further evidence to support the inclusion of the City as a spatial priority and deliver on “Ambition-Opportunity-Place”.

In the call for views for the Infrastructure and Capital Investment Committee specific mention was made of the role of National Developments.

I have grave concerns that the lack of emphasis on the City, and the key development corridor elements identified in the GCVSDP (Clyde Gateway, Clyde Waterfront and Glasgow City Centre), as spatial priorities means that the role and emphasis on National Developments should be reconsidered to properly reflect the contribution that can be made to Scotland’s prosperity. I will therefore submit further information, in the format of the call for National Developments, which will demonstrate the emphasis required.

I look forward to hearing from the Committee Clerks.

Yours faithfully



Richard Brown  
Executive Director