

Royal Town Planning Institute (RTPI) submission of 29 November 2022

PE1943/C: Help prevent the destruction of greenfield sites by providing financial incentives towards the remediation and reuse of brownfield sites

RTPI Scotland understands that Scotland has almost 11,000 hectares of vacant and derelict urban land sites. The amount of land in Scotland on the Vacant and Derelict Land Register has remained constant for a number of years, with 47% of sites remaining on the register for over 20 years. Vacant and derelict land (VDL) can have a significantly detrimental impact on local communities. The issue of VDL does not impact upon communities evenly with research from the Scotland Land Commission (SLC) revealing that deprived communities are more likely to live within 500 meters of a derelict site.

RTPI Scotland wishes to highlight the work produced by the SLC on the matter, including a series of recommendations regarding VDL developed from a taskforce which RTPI Scotland was a contributing member¹. We support its key recommendations:

- dedicated funding to support bringing vacant and derelict land back into use should be increased and an evaluation of the Vacant and Derelict Land Fund should be undertaken to ensure that funding criteria are fit for purpose.
- The Scottish Government should initiate a review of strategic funding streams to ensure that they are aligned around the Place Principle and incorporate criteria that will help to direct investment to parts of the country that need it most. To support this, new approaches for appraising capital investment should be adopted across the public sector that go beyond financial measures and provide a clearer focus on wellbeing.
- New approaches to funding the remediation of vacant and derelict land should be developed. This should include the introduction of an innovative new compensation instrument that would enable unavoidable biodiversity loss from greenfield development to be

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https://www.landcommission.gov.scot/downloads/5f73555fbfe93_VDL%20Task%20Force%20Recommendations.pdf

offset by improvements to derelict sites elsewhere, a new fund to enable derelict sites to be remediated to create a publicly-owned development land bank, and a community fund to tackle harmful and persistent small scale sites.

RTPI Scotland continues to request that the public sector take a more proactive leading role in regeneration. We note the petition states the need to provide grant funding to local authorities to support remediation of brownfield land as seen in England. In the first instance we would wish to highlight to the Committee the Scottish Government's 5-year Vacant and Derelict Land Investment Programme which was launched in 2020 with a budget of £50 million. Whilst this funding is welcomed, RTPI Scotland are aware that the total available funds have been reduced from previous investment programmes and there are issues regarding their long-term certainty. It is critical that, if adopted, the NPF4 be considered as the key means by which we coordinate investment of the Vacant and Derelict Land Fund with a range of other funding streams, place-based initiatives, emerging national plans, programmes and strategies. RTPI Scotland see a revised version of the NPF4 delivery programme as a means to achieve this as set out in our recent response to the Local Government Housing and Planning Committee².

RTPI Scotland wants to highlight our previous research that considers the fundamental role planning, urban density and population critical mass in producing successful places³.

The key role for the planning system in addressing VDL has been recognised for number of years but has recently been reasserted with the publication of the revised draft National Planning Framework 4⁴ (NPF4) and the draft Local Development Plan (LDP) regulations and guidance⁵. The revised draft NPF4 contains an updated and expanded policy on VDL and empty buildings that encourages re-use of land and buildings and discourages greenfield development unless there are no suitable brownfield alternatives. The revised draft NPF4 also contains policies which limit out-of-town developments and a renewed emphasis on reusing empty buildings in order to maximise the retention of embodied energy. RTPI Scotland hopes the provision of clear policy at a

² <https://www.rtpi.org.uk/consultations-rtpi/2022/november/rtpi-scotland-response-to-revised-draft-national-planning-framework-4/>

³ RTPI (2018) Settlement Patterns, Urban Form and Sustainability. May. Available here: <https://bit.ly/3srnL5B>

⁴ <https://www.gov.scot/publications/national-planning-framework-4-revised-draft/>

⁵ <https://www.gov.scot/publications/local-development-planning-regulations-guidance-consultation-part-c-draft-guidance-local-development-planning/>

national level will further support the better use of VDL and empty buildings.

Consideration on the suitability of development sites is complex. It is important to note that housing is not always the most suitable land use for brownfield land, with optimal land use often being very dependent on the context. For example, brownfield sites may not always be well connected to public transport infrastructure.

Alternative uses for brownfield land could include opportunities for productive greenspace, renewable energy developments, economic development uses, etc. Another consideration is that greenfield sites differ markedly in their ecological and amenity value. The LDP preparation is a critical means by which such matters are considered. As mentioned above, the recently published draft LDP guidance and regulations have set a renewed policy direction for the planning system regarding the re-use VDL and redundant buildings. We expect a finalised version of the LDP guidance and regulations to be published in 2023. The renewed policy emphasis stresses the need for LDPs to identify how VDL can be used for future development. Circular economy principles are to be considered addressing 'end-of-life' of buildings and sites, and the National Transport Strategy 2 investment hierarchy through a 'brownfield first' approach ahead of greenfield land. Priority is to be given to establishing new uses for VDL in, or adjacent to, areas where there are high levels of deprivation and/or disadvantage. A role has been highlighted for the preparation of site briefs and design guides to proactively promote the development of VDL. There are other additional workstreams under the on-going planning reform which could potentially support the reuse of VDL including Compulsory Purchase Order reform and Masterplan Consent Area guidance.

RTPI Scotland supports the renewed policy emphasis set out in revised draft NPF4 and the draft LDP regulations and guidance. However, for planners to prepare LDPs, produce design guidance and site briefs and process planning applications for productive use of brownfield land, the planning system needs to be resourced effectively – an area of concern to RTPI Scotland, reflected in our research⁶.

⁶ RTPI Scotland (2021) Resourcing the Planning Service: Key Trends and Findings 2021. June. Available here: <https://bit.ly/3s5h4Yc>