

The Royal Incorporation of Architects in Scotland (RIAS) submission of 13 January 2023

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

The Royal Incorporation of Architects in Scotland (RIAS) welcomes the invitation to respond to the Scottish Parliaments Petitions Committee.

The Royal Incorporation of Architects in Scotland (RIAS) is the professional body for all of Scotland's chartered architects. Our members work in over 1000 architectural practices of all sizes, as well as in areas of industry from housebuilding to local and central government. The RIAS should be seen as a prime participant in the review process. The RIAS is responding on behalf of the 5000 members of the architectural profession. The RIAS has drawn on its members' expertise in planning and offers the following matters for consideration.

The RIAS would welcome the opportunity to address any of the points raised in this paper and to assist further alongside any calls for evidence that may follow.

The RIAS recognises the challenges faced by local authorities and the government in addressing brownfield land. There are opportunities though the planning system as well as supporting mechanisms to address this challenge. The RIAS considers NPF4 and Scottish Planning Policy should address these concerns. Our members also recognise that additional measures could be considered that might help to address and prioritise brownfield land, critical in supporting the climate commitments and move towards a circular economy, promoted by the Scottish Government.

We have captured points the RIAS has raised previously in relation to NPF4 alongside some matters for further consideration. We hope these will assist in the committee's consideration of the issues.

The RIAS responded to NPF4 in 2022 with a call to focus on communities and the climate challenges that will be faced by Scotland.

In particular we responded to questions relating to the proposed spatial principles and how these might influence and shape where development is located. Realising the potential of brownfield land is a critical aspect of this spatial strategy.

- Spatial principles

Q 6: DO YOU AGREE THAT THESE SPATIAL PRINCIPLES WILL ENABLE THE RIGHT CHOICES TO BE MADE ABOUT WHERE DEVELOPMENT SHOULD BE LOCATED?

- The Spatial Principles should also focus on improving and adapting existing assets and infrastructure to ensure that our settlements are brought up to the same standard as new and proposed development. A more robust strategy for shaping these Principles into Outcomes is essential.
- The principle of 'Compact Growth' must be considered alongside, and in the context of, sustainable design and placemaking principles to ensure that accessible and increased green/ blue space and the principles of the 20-Minute Neighbourhood and Place Standard are addressed in certain urban areas – it should not be seen as a single solution, but carefully nuanced in relation to what is needed to improve local neighbourhoods in terms of access to open space and increased biodiversity.
- A stronger policy context is needed in relation to high buildings, recognising their impact on street comfort and health implications and to factor in embodied carbon over the lifetime of the buildings. Local Development Plans must be required to consider building height in the context of sustainable design, for example.
- Community awareness of where planned development is to be located is important. Including an educational and community outreach strategy that will inform the public not simply of the intention of the development, but how they can interact with it should be considered as an integral part of the

Development Planning process and through any developer led consultations or co-production process.

The RIAS also strongly advocated for a strong plan led approach for NPF4, highlighting that proposals that do not comply with the Local development Plan should have a strong presumption against approval.

Policy 1: Plan-led approach to sustainable development

Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?

- *The plan-led approach to sustainable development could realise Scotland's outcomes by embedding the Framework (Spatial Strategy, Principles and National Priorities) as a holistic future for Scotland.*
- *Proposals that do not comply with a Local Development Plan should have a strong presumption against approval.*
- *Proposals should fit in with adopted Local Place Plan aspirations.*
- *The Framework should reference what other plans might be taken into consideration, for instance local place plans.*

More specifically the RIAS responded to the call for ideas for NPF 4 where we highlighted the importance of brownfield land and increases in density would be critical:

- ***What development will be needed to address climate challenge- infrastructure and place*** “Brown Field Development and Increased Densities: Prioritise brownfield development and increase / set minimum levels of density for inner city brown field sites”.
- ***What does planning need to do to enable development and investment in our economy to benefit everyone?***

Urban Renewal: Maintaining tight urban boundaries will ensure that development pressures are directed as far as possible to redevelopment land and brownfield sites; maintaining pressures for urban renewal and improvement within established communities

The RIAS recognises that the SPP (Scottish Planning Policy) embodies sustainability and the brownfield over greenfield principle in land allocation/ being brought forward for development. However, our members have seen that principle let down over the past decade for many reasons. For example, slow progress on LDPs and reviews, too few local place plans, costs of infrastructure/ site remediation and general investment. We also consider the length of time it took from the first iterations new Planning system through to the 2019 Act will have had an impact.

The RIAS recognises the problems raised by the petition. Our members have also seen greenfield housing appeal decisions across particularly central Scotland where the LDP is out of date allowing greenfield developments which might not have been allocated through the LDP process if it had not taken so long.

We also recognise there is an ever increasing, shortfall across the central belt of oven ready sites. In order to give brownfield a serious push, further consideration of measures including national tax incentives, grant funding for site investigations and remediation, promotion of brownfield land for public projects, bringing back the regeneration focused organisations that have been lost in the past 10 - 15 years, would be important.

The RIAS would consider further review of the performance of Council-Owned Urban Regeneration Company (**URC's**) might be helpful in understanding the complexities and barriers to unlocking sites. Many brownfield sites require support with site Investigations and infrastructure costs. These could be supported with a multi-focussed regeneration package that would form part of the delivery plan for NPF4.

The RIAS would also highlight the importance of soils as a critical resource. NPF4 sets out a strong presumption for protecting soils, critical to the protection of greenfield land. The Scottish Government's Circular Economy Bill also highlights the significant volume of waste from construction in soil, something that must be addressed through better and coordinated design proposals and solution.