

## National Planning Framework 4 - call for ideas

### Cycling Scotland submission April 2020

#### Introduction

Cycling Scotland welcomes this overall approach to planning reform:

“NPF4 will incorporate Scottish Planning Policy (SPP) which contains detailed national policy on a number of planning topics. For the first time, spatial and thematic planning policies will be addressed in one place.

NPF4 will have the status of the development plan for planning purposes. This is a change to the current position and will mean that its policies will have a stronger role in informing day to day decision making.”

Our submission comments on both Scottish Planning Policy (SPP) and the National Planning Framework Housing Technical Discussion Paper.

In response to the current Covid-19 pandemic, the planning system needs to take into account the need to adjust for current and future pandemics. Specifically, the need for physical distancing should be incorporated into decisions around space allocation and sufficient footway and cycle lane width should be provided in new developments.

#### General comments

We welcome that SPP will become statutory, if it ensures that planning decisions take proper account of Government objectives, above all, recognising the climate emergency we face. It is vital that the planning system enables and directs development to the right location.

There needs to be a strong focus on improvements to SPP to strengthen decision making. Current SPP does contain a section on promoting sustainable transport and active travel which is welcome; however, despite the clear policies in SPP relating to consideration of cycling and walking and active travel networks, these policies, and associated advice in guidance documents, are not always widely implemented in practice, with a presumption still in favour of car-centric developments and decisions. Properly integrating active travel into policy as well as practice will require a significant shift in focus of planning at both national and local levels.

To ensure Scotland experiences the cross-cutting benefits of better places that can be achieved from increased levels of cycling and walking, there needs to be a more effective transition from the policies within SPP to the actions taken by those involved in planning processes in order to implement improvements to encourage active travel. There should be a presumption in favour of cycling, walking and public transport in the planning system and infrastructure for all new housing, commercial and retail developments, and where possible, a requirement to undertake retrofit to existing developments to provide these links, in particular for on-street cycle parking in high-density locations.

In this regard, there is a need for investment in skills training and capacity building for transport planners and construction staff. Many local authorities do not currently have the

institutional capacity to deliver a massively expanded network of walking and cycling routes, paths and related infrastructure. In addition, many transport staff who have been trained to build large infrastructure projects will need to be re-trained in delivery of walking and cycling infrastructure. This process can be prepared for immediately to get underway as soon as NPF4 is approved and be boosted by extra investment over 1-3 years until the workforce is at the right level.

We have set out a number of key improvements that we would recommend through the process of bringing together SPP into NPF4.

**Current draft:**

“23. The SPP sets out how this should be delivered on the ground. By aligning development more closely with transport and digital infrastructure, planning can improve sustainability and connectivity.”

**Comment:**

It should be made clear that development should be aligned with public and active transport infrastructure. Development aligning with road infrastructure, for example clustering around motorway and dual carriageway junctions, encourages car dependence and delivers community severance.

**Current draft:**

“40. This requires spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area. To do this, decisions should be guided by the following policy principles:

- using land within or adjacent to settlements for a mix of uses. This will also support the creation of more compact, higher density, accessible and more vibrant cores.
- considering the re-use or re-development of brownfield land before new development takes place on greenfield sites.”

**Comment:**

This is a positive policy principle and should be strengthened. Development should be directed to re-use or re-development of brownfield land and there must be a firm presumption against greenfield site development

**Current draft:**

Easy to move around and beyond

“46. This is development that considers place and the needs of people before the movement of motor vehicles. It could include using higher densities and a mix of uses that enhance accessibility reducing reliance on private cars and prioritising sustainable and active travel choices, such as walking, cycling and public transport. It would include paths and routes which connect places directly and which are well-connected with the wider environment beyond the site boundary. This may include providing facilities that link different means of travel.”

**Comment:**

This is a very positive policy principle and should be strengthened. Direct paths beyond a site boundary are essential, as are linking public transport nodes with sites.

**Current draft:**

“59. The town centre first principle, stemming from the Town Centre Action Plan”

**Comment:**

The sequential approach and town centre first principle should be embedded in the planning system to a far greater extent so that developments in town centres are supported.

**Current draft:**

Development management

“287. Planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where:

- direct links to local facilities via walking and cycling networks are not available or cannot be made available;
- access to local facilities via public transport networks would involve walking more than 400m.

or

- the transport assessment does not identify satisfactory ways of meeting sustainable transport requirements.”

**Comment:**

We would suggest this is re-phrased to:

287. Planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car. All developments of sufficient size and scale should require:

- direct links to local facilities via walking and cycling networks made available;
- access to local facilities via public transport networks should not involve walking more than 400m.

The NPF4 should make explicit reference to and linkage with other relevant strategies and action plans, including the National Transport Strategy<sup>1</sup> and the Active Travel Framework<sup>2</sup>, to ensure policy coherence and emphasis on active travel in all planning policy decisions. It must also make clear the status of Designing Streets so that decisions are made using the correct framework for local roads.

**Question 1 – What development will we need to address climate change?**

Scotland is facing a climate emergency and the planning system has a significant role to play in ensuring current and future planning decisions help to address climate change and associated issues.

Restrictions on road development, including ending new road building, and increased promotion of active travel and public transport, to deliver on the Sustainable Transport Hierarchy, are required to mitigate climate change impacts and address the climate emergency. This includes the development of safe cycling and walking routes to bus hubs

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<sup>1</sup> National Transport Strategy 2 (2019) <https://www.transport.gov.scot/media/47052/national-transport-strategy.pdf>

<sup>2</sup> Active Travel Framework (2019) <https://www.transport.gov.scot/media/47158/sct09190900361.pdf>

and train stations, as well as provision of secure bike parking at these key public transport hubs. Cycling is a viable and cost-effective way to reduce carbon and other emissions, as a zero-carbon option, to help move Scotland towards a carbon-neutral economy, and offers a wide range of environmental and health benefits including noise reduction, less air pollution and emissions, reduced congestion, and increasing attractiveness of places.

Transport is now the single largest source of greenhouse gas emissions in Scotland, accounting for 37% of total emissions. Of this, cars are the largest individual source, accounting for 40% of these emissions<sup>3</sup>. Private cars remain the dominant mode, with the largest proportion of journeys being short, single occupancy journeys. Action in this area needs to be prioritised to shift these short car journeys to more active modes. More than 50% of car journeys are under five kilometres<sup>4</sup>, and it is these journeys that offer the greatest potential to switch to cycling and help to address the climate emergency. The proportion of short journeys by active travel needs to increase.

The planning system has a key role to play in addressing this issue and facilitating the necessary shift away from cars. It is important that spatial planning and placemaking policies, such as NPF4, incorporate consideration as to how cycling and walking can be integral to planning decisions to address climate change. Developments which give precedence to cycling and active travel, and connections to public transport, are essential, and should be prioritised.

Segregated cycle lanes which separate people cycling from traffic should be prioritised in towns and cities, in this regard. Delivering a strategic network of connected segregated, easily accessible cycling infrastructure is required to encourage modal shift to cycling, especially for short, everyday journeys and to meet the principle of reallocating road space away from cars to more active modes. Additionally, to facilitate longer personal trips, the use of e-bikes should be supported and encouraged, including the installation of accessible charging points for e-bikes and provision of infrastructure enabling long distance commuting by e-bike.

The NPF4 should make explicit reference to and identify linkages with other strategies, action plans and legislation focused on addressing the climate emergency, including The Environment Strategy for Scotland<sup>5</sup>, Climate Change Plan<sup>6</sup>, and Climate Change (Emission Reduction Targets) (Scotland) Act<sup>7</sup>. Linkages should also be made with relevant strategies and action plans in other areas (outlined above in our introduction) to ensure policy coherence and emphasis on active travel in all relevant planning policies and decisions.

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<sup>3</sup> Scottish Greenhouse Gas Emissions (2017) <https://www.gov.scot/publications/scottish-greenhouse-gas-emissions-2017/pages/3/>

<sup>4</sup> Transport Scotland (2019) Travel and Transport in Scotland <https://www.transport.gov.scot/media/45852/sct09199889061.pdf>

<sup>5</sup> Scottish Government (2020) The Environment Strategy for Scotland: vision and outcomes <https://www.gov.scot/publications/environment-strategy-scotland-vision-outcomes/>

<sup>6</sup> Scottish Government (2018) Climate Change Plan: third report on proposals and policies 2018-2032 <https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018-9781788516488/>

<sup>7</sup> <https://www.parliament.scot/parliamentarybusiness/Bills/108483.aspx>

## **Question 2 – How can planning best support our quality of life, health and wellbeing in the future?**

Improving health is key to building resilient communities. A built environment that facilitates and encourages physical activity, through active travel, is important and will help ensure benefits to health are realised. The planning system is a key catalyst for this.

Cycling and active travel is well documented as positively benefitting health and wellbeing and improving quality of life. Rising levels of physical inactivity are a significant cost to society. Physical inactivity is estimated to cost the NHS in Scotland £94.1 million annually (equivalent of £18 per head of the population per year)<sup>8</sup>, with the burden of disease caused by this physical inactivity more readily experienced in deprived populations. Cycling is not only a highly effective and efficient way to increase rates of physical activity, it also helps to reduce the risk of many lifestyle diseases including cancer, stroke and heart disease, and helps to improve overall quality of life. There is also evidence of strong, positive mental health impacts of active travel and accessing green space.

Consideration of cycling and active travel should be emphasised as an essential element of the planning system, to further align with public health objectives and ensure a joined-up, cross-portfolio evidence base for policy decision making. By putting in place mechanisms which prioritise cycling and active travel at developments, helping to reduce car use and congestion in town and cities, and subsequently improving air quality and increasing levels of physical activity, through this reduced car use, the planning system can best support health and wellbeing and help to improve quality of life, both now and in the future.

## **Question 3 – What does planning need to do to enable development and investment in our economy to benefit everyone?**

We note the focus in SPP on delivering sustainable economic growth. This needs to be clarified as building houses in the greenbelt is argued to increase sustainable economic growth. It should be much clearer through SPP implementation that health and environmental benefits do not inhibit growth but do direct it to the right location and in the right form. It is important that growth is not only sustainable but that it is also inclusive and equitable, helping to reduce inequality. SPP should be updated to reference inclusive economic growth.

The present transport and planning systems, through continuing to prioritise road development, places an unequal burden on those in the most deprived communities, and there is a risk that a growth in car ownership, and infrastructure to facilitate this, further isolates those without access to a car. Re-focusing on providing integrated and responsive active travel services and infrastructure, and ensuring all new developments have good links to active travel networks and sustainable public transport, instead of building new roads and continuing to focus on car-centric planning, is essential. This will contribute significantly to reducing inequality in Scotland and ensure that the planning system delivers an economy that benefits everyone. The viability and attractiveness of cycling in an area can influence the embedded transport costs of living in an area, including, for example, whether households choose to purchase a second car. Planning decisions should be focused on taking space away from and reducing reliance on private vehicles in this regard.

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<sup>8</sup> <http://www.healthscotland.com/uploads/documents/20437-D1physicalinactivityscotland12final.pdf>

It is well evidenced that the return on investment in cycling and walking infrastructure is much greater than from roads, with the benefits significantly outweighing the costs<sup>9</sup>.

## **Question 5 – What infrastructure do we need to plan and build to realise our long-term aspirations?**

To realise long-term ambitions, there should be a presumption in favour of walking, cycling and public transport, delivering on the Sustainable Transport Hierarchy, in (planning) infrastructure decisions. There is a need to deliver coherent networks of safe, easily accessible segregated cycling infrastructure in towns and cities across the country, to enable anyone anywhere to cycle. This entails cohesive, seamless networks of on-road segregated routes in cities and links to existing off road networks. This should be further supported by promoting modal integration between active travel and (sustainable) public transport to create truly sustainable door-to-door journeys, further reducing the need for and reliance on private vehicles.

Infrastructure that supports car-free development both now and going forward should also be prioritised.

There also needs to be a focus on working with housing and other developers on promoting the benefits of active travel and ensuring that developments have good linkages to existing active travel networks and public transport interchanges. Where new developments are being planned, primary consideration should be given to making connections to these linkages. Where linkages to infrastructure do not exist or are not able to be delivered, the decision to permit development in a particular area should be reconsidered accordingly. This is currently lacking in SPP and needs to be strengthened to realise long-term aspirations.

Provision of cycling infrastructure is crucial to facilitate a shift to cycling, including accessible and secure cycle parking, segregated cycle lanes, filtered permeability to shorten journey length, and managing parking provision.

It is important that planning policy aligns to other areas of policy, especially transport and climate change, as planning is especially relevant to and crucial in implementation in these areas. In Scotland, we have excellent policy statements and guidance ready to be followed such as Scottish Planning Policy, the Town Centre First principle, National Maximum Parking Standards, Core Path Plans, the Place Standard and Designing Streets, to name a few. These policies, rather than being precedents from decisions made many years ago, should guide development to locations where it is more likely that people will travel sustainably and actively. The current climate emergency also presents a further opportunity to change behaviour in planning and infrastructure and create ambitious transformative change in the planning system and beyond.

## **Final comments**

We note that the Housing Technical Discussion Paper (National Planning Framework 4 – Meeting the requirement to set “targets for the use of land for housing in different areas of Scotland”) principles make no reference to climate change.

We make the following comments on the following guiding principles:

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<sup>9</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/877511/cycling-and-walking-business-case-summary.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/877511/cycling-and-walking-business-case-summary.pdf)

- “the approach to setting national housing land figures is intended to provide early clarity and to reduce conflict and complexity in the local development plan process.”

Our comment: this is the correct approach to take.

We note the following guiding principles:

- “the purpose of the figures is to ensure that local development plans allocate sufficient land for housing. We propose that the figures in NPF4 are expressed as minimum figures for housing land to accommodate an agreed projected number of homes.
- an agreed proportion of this land should be ‘deliverable’ whilst the remainder should reflect the longer-term spatial strategy for the area. The policy and / or guidance could provide clarity on what is expected to be deliverable land, as well as addressing longer term strategy.”

Our comment: these principles need to make explicitly clear that land for housing must meet the requirements set out in SPP and that land which will require reliance on the car for transport requirements should not be included in local development plans as suitable land for housing.

Additionally, we believe this discussion paper should adequately take into account the following recommendations of the Infrastructure Commission for Scotland:

“5. The Scottish Government should lead the development of a place based assessment of long term housing supply and demand across Scotland by 2021, supported by the development of a coherent strategy for the labour market and business opportunities arising from an inclusive net zero carbon economy.

6. To support the implementation of National Planning Framework 4 and the new system of development plans, a co-ordinated and appropriately resourced Infrastructure First approach to the planning system should be introduced by the Scottish Government by 2021. This should be undertaken with infrastructure providers, developers and other public bodies, to ensure the effective delivery of a Scotland wide, integrated and coherent outcome based approach to planning spatial land use; with implementation to be undertaken at the appropriate regional, local and community level.”<sup>10</sup>

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<sup>10</sup> Infrastructure Commission for Scotland (2020) Phase 1: key findings report. A blueprint for Scotland [https://infrastructurecommission.scot/storage/247/FullReport\\_200120a.pdf](https://infrastructurecommission.scot/storage/247/FullReport_200120a.pdf)