

National Planning Framework 4 Position Statement

Cycling Scotland submission February 2021

Question 1 – Do you agree with our current thinking on planning for net-zero emissions?

We welcome the current thinking for planning for net-zero emissions.

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. It is welcome that the chapter acknowledges this.

Transport is the single largest emitting sector in Scotland, accounting for 35.6% of greenhouse gas emissions in 2018. Of these, 40% are from cars¹, with vans (Light Goods Vehicles) increasing to account for 13% of emissions². The 93% increase in LGV emissions between 1990 and 2018, the largest percentage increase of all transport modes, is of great concern. The planning system has a key role to play in addressing this.

We welcome that the important linkages between transport, the planning system and achieving net-zero emissions is recognised and acknowledged. It is also welcome that the chapter details a commitment to promote high quality walking, wheeling and cycling environments and public transport, in preference to single occupancy private car use. Such an approach is vital to help deliver on net-zero emission targets and to address the climate emergency. Whilst recognition of this is important, questions remain on how such commitments will be implemented.

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 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.

We note in this section there is reference made to ULEVs/electric vehicles and a plan for charging infrastructure for these vehicles, as part of an approach to targeted infrastructure investment. Whilst such vehicles have a role to play in helping to decarbonise transport, it should not be relied upon too heavily to achieve desired policy outcomes, as the pace of change and rate of uptake cannot be guaranteed. Such vehicles still represent vehicular traffic on the roads and issues of congestion and emissions, from very harmful particulate matter emissions from braking and tyre wear³, remain. The biggest barrier to cycling is

¹ Scottish Government (2020) Update to the Climate Change Plan 2018 – 2032 Securing a Green Recovery on a Path to Net Zero

² Scottish Government: Carbon Account for Transport No. 12: 2020 Edition

³ Lelieveld, J, K. Klingmuller, A. Pozzer, U. Poschl, M. Fnais, A. Daiber, and T. Munzel (2019)

‘Cardiovascular disease burden from ambient air pollution in Europe reassessed using novel hazard

concern about traffic on the road, and so a large number of these vehicles, in place of conventional petrol or diesel vehicles, may discourage people from cycling, which could undermine the achievement of emission reduction targets and broader climate change objectives. The focus should be on promoting delivery of the sustainable travel hierarchy, implementing it into budget decisions and prioritising active travel (and other sustainable modes). Where charging infrastructure does exist, this needs to be readily accessible by e-bikes to further aid the delivery of net-zero targets and objectives. E-cargo bikes, where utilised for first and last mile deliveries, have an important role to play in reducing transport emissions as they can help to reduce the number of freight and delivery vehicles on the road, and so need to be considered when (charging) infrastructure for electric vehicles is being designed and implemented.

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.

Separated dedicated cycle lanes which separate people cycling from traffic should be prioritised in towns and cities, in this regard. Delivering a strategic network of connected separated, 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. The ability to store a bike in or near any residential property is essential. Additionally, as outlined, to facilitate longer personal trips, the use of e-bikes should be supported and encouraged, including, as previously mentioned, the installation of accessible charging points for e-bikes and provision of infrastructure enabling long distance commuting by e-bike.

We note reference in the Statement that clear choices will need to be made to direct development to locations which reduce the need to travel and are already well served by sustainable transport options. This is welcome. The greenest mile is the mile not travelled, and commitments to embed the Sustainable Transport Hierarchy in decision making, outlined in the Statement are welcome in achieving this to support the delivery of net-zero emissions.

Question 2 – Do you agree with our current thinking on planning for resilient communities?

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)⁴, 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

ratio functions' European Heart Journal 0:1-7

<https://academic.oup.com/eurheartj/advancearticle/doi/10.1093/eurheartj/ehz135/5372326>

⁴ <http://www.healthscotland.com/uploads/documents/20437-D1physicalinactivityscotland12final.pdf>

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, help to improve quality of life, both now and in the future, and build community resilience. We welcome reference to applying the concept of 20-minute neighbourhoods. It is important in the application of the concept that differences between neighbourhoods in rural and urban areas are recognised and that a one-size-fits-all approach may not be workable.

We note and welcome the potential policy change identified - reducing the need to travel unsustainably by embedding the Sustainable Travel and Investment Hierarchies into decisions. There should be a presumption in favour of planning in places which deliver on this objective. Further, it is welcome that linkages to the National Transport Strategy, Strategic Transport Projects Review, the 2030 Vision for Active Travel and Active Travel Framework are identified and acknowledged, recognising the important role of active and sustainable transport in planning. We previously called for this in our submission to the previous consultation on the NPF4, held in April 2020⁵. Again, further detail is required on how policies to support these linkages will be identified and implemented.

We welcome the commitment outlined prioritising new homes on brownfield land where appropriate and to the redevelopment of existing buildings. It is important development should be directed to re-use or re-development of brownfield land and there must be a firm presumption against greenfield site development. This principle should be further extended to commercial and other sites, with a focus to ensure 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.

Question 3 – Do you agree with our current thinking on planning for a wellbeing economy?

We note the commitment to ensuring a sustainable and green economic recovery, which is welcome. Ensuring a green recovery after Covid-19 is a key commitment of the Scottish Government⁶, and budgetary decisions need to support this. Decisions which support the delivery of the Sustainable Transport and Investment Hierarchies, as part a comprehensive planning system, are required in this regard. It is essential that it is also a socially just recovery as part of a Just Transition, to ensure the planning system can deliver equitable and sustainable outcomes. We welcome the commitment to sustainable and economic growth to help deliver this.

⁵ <https://www.cycling.scot/mediaLibrary/other/english/7804.pdf>

⁶ <https://www.gov.scot/publications/green-recovery-low-carbon-energy-project-capital-funding-form-and-guidance-2/>

We note the acknowledgement that while new technologies making vehicles less dependent on fossil fuels will make a contribution to delivering on net-zero emissions, they are not enough on their own to achieve net-zero, and instead the focus will be on managing demand and reducing the need to travel by unsustainable modes. This is a welcome commitment.

With regards to freight connectivity, we welcome reference to cargo bikes. As previously outlined, LGVs are responsible for a significant increase in emissions from transport. In this regard, cargo and e-cargo bikes have an important role to play in reducing emissions from transport, by providing sustainable first and last mile delivery options. Promotion of such vehicles will also help to reduce the number of LGV and other vehicles on the roads, which will reduce congestion, improve safety for vulnerable road users, and lead to an overall improvement in connectivity.

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.

Question 4 – Do you agree with our current thinking on planning for better, greener places?

We welcome the policy commitment to embedding both the Place Principle and use of the Place Standard Tool in the planning system. Towns and city centres should be for people not cars, and the planning system has a crucial role to play in this regard through promoting active travel for delivering better, greener places. Places and spaces designed for cycling have strong economic benefits associated with them, including increased retail activity, higher house prices, reduced health care costs and greater productivity. Cycling is good for business. It helps to create greater footfall which is associated with an increase in trade and revenue for shop owners. Retail sales can increase by as much as a quarter where bike lanes are provided⁷. Research has shown that retailers often underestimate the proportion of customers who access shops and local businesses by bike and over-estimate the proportion of car users among their customers. Cycling delivers five times higher spend than the same area of car parking, and people who cycle do their shopping locally and are more loyal customers⁸.

We note the statement in this section that there is “*support for stronger prioritisation of brownfield development over the release of greenfield land*”⁹. As previously outlined, this is a welcome commitment and should help to ensure the right development is delivered in the

⁷ Designed to Move: Active Cities report <https://activelivingresearch.org/blog/2015/07/designed-move-activescities#:~:text=The%20report%20shows%20that%20cities,improved%20health%20and%20well%2Dbeing.>

⁸ European Cyclists Federation (2019) The benefits of cycling: Unlocking their potential for Europe <https://ecf.com/sites/ecf.com/files/TheBenefitsOfCycling2018.pdf>

⁹ National Planning Framework 4 Position Statement

right place, whilst ensuring the integrity of places and spaces to deliver greener, better outcomes. The above statement could go further by ensuring that development on brownfield land is always considered as the first option for development, rather than just stronger prioritisation for it.

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. We welcome the support given to local authorities to introduce temporary cycling and walking infrastructure to support people to travel actively for essential journeys during the lockdown. Evidence from a recent survey we carried out highlights the importance of dedicated segregated infrastructure to encourage cycling, with more than a quarter of survey respondents stating that dedicated cycle paths would be the most likely factor to encourage them to cycle after the first lockdown¹⁰. In this regard, in response to the current pandemic, there is a need to ensure that transport infrastructure decision-making and spending takes into account the need to deliver space separated for different users, especially in busier urban areas with cycle lanes physically separated from footways and the carriageway. Space allocation decisions and ensuring sufficient footway and cycle path width will help physical distancing for active travel and public transport, both now and in response to future pandemics.

Question 7 – Do you have any other comments on the Position Statement?

We broadly welcome the key opportunities outlined at the start of the Position Statement. In opportunity 12, as previously commented, where electric vehicle charging infrastructure is installed, this needs to be readily accessible by e-bikes. We welcome the proposal in this opportunity to remove the need for planning permission for active travel infrastructure.

¹⁰ <https://www.cycling.scot/news-article/new-lockdown-cycling-survey>