

Draft National Planning Framework 4

Cycling Scotland submission March 2022

Question 22 - Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

We agree that climate change is one of the biggest challenges facing Scotland today and should be at the forefront of decision making.

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 link 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 and accessible bike parking at these key public transport hubs.

Cycling is a viable and cost-effective way to reduce carbon and other emissions to help move Scotland towards a carbon-neutral economy. It offers a wide range of environmental and health benefits including noise reduction, less air pollution and emissions, reduced congestion, and increasing attractiveness of places.

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

Policy 1: Plan-led approach to sustainable development

Question 23 - Do you agree with this policy approach?

We welcome the commitment outlined prioritising new homes on brownfield land / redevelopment of existing buildings.

It is important to ensure new 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 networks and services. 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.

Policy 2: Climate emergency

Question 24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

We welcome the consideration that is given to viewing the 'lifecycle' of any new development: this is especially pertinent for new road building / development of existing roads.

Priority should be given to funding and planning public transport networks and interchanges, and active travel infrastructure

Question 28: Do you agree that this policy will enable the planning system to promote design, quality and place?

We welcome the inclusion of the access and inclusion parts of a design-led approach.

There can sometimes be conflict around new infrastructure that then impacts on people who have access issues (disabilities, visual impairments etc.) so we welcome this policy.

[Cycling by Design](#) should represent a formal requirement when it comes to place making and design of our streets, as should Designing Streets.

We welcome the six qualities of successful places as barometers of design, especially points on places being designed for health and wellbeing, well connected and easy to move around and sustainable.

We would suggest that on the final point 'e' (*Proposals that are detrimental to the character or appearance of the surrounding area taking into account effects on daylight, sunlight, noise, air quality and privacy should not be supported, in order to protect amenity*) could be expanded to include reference to designing cycling infrastructure that is:

- A) Permanent.
- B) Resilient: not prone to flooding, well drained, using long-lasting materials that are resilient to Scottish weather, won't degrade resulting in potholes etc.

Policy 9: Quality homes

Question 31: Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

The choice of land identified for housing should prioritise accessibility to active and sustainable transport and be designed in a way that reduces travel demand by car.

The ability to securely store a bike in or near any residential property is essential. Planning criteria for new developments should include convenient and accessible cycle storage for every household.

Additionally, as outlined, 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.

Policy 10: Sustainable transport

Question 32: do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

We welcome the point in policy that cycle storage in new developments should be prioritised, this should also be the case for homes.

We welcome the following point: *“Development proposals should consider the need to supply safe and convenient cycle parking to serve the development, sheltered where possible, unless it can be demonstrated that existing nearby provision is sufficient. Cycle parking should, be more conveniently located than car parking serving the development. Flatted residential development should give consideration to the need to provide secure and convenient storage for range of cycle types and sizes, depending on the type, location and accessibility of the development and the likely needs of the users.”*

We would add that the cycle parking must always be sheltered and accessible, especially for residential use and therefore the words “where possible” should be deleted from the above paragraph.

Delivering a strategic network of connected, easily accessible cycling infrastructure is required to encourage modal shift from cars to cycling, especially for short, everyday journeys and to meet the principle of reallocating road space away from cars to more active modes. Dedicated cycle lanes, which separate people cycling from traffic and pedestrians, should be prioritised.

This network of cycle lanes needs to reflect the everyday journeys that people make to create a web of infrastructure that connects work, schools, residences, services, leisure and other transport services.

Question 48: Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

We welcome the commitment outlined prioritising new homes on brownfield land / redevelopment of existing buildings. In our 2021 submission we called for development of brownfield land to be always considered as the first option for development, rather than just strong prioritisation for it.

Policy 30 (c) addresses this: *Proposals on greenfield sites should not be supported unless the site has been allocated for development or the proposal is explicitly supported by policies in the development plan, and there are no suitable brownfield alternatives.*

As previously outlined, this is a welcome commitment and should help to ensure the right development is delivered in the right place, whilst ensuring the integrity of places and spaces to deliver greener, better outcomes.