



Engender response to the Scottish Government 'Call for ideas' for the National Planning Framework 4

March 2020

***Note:** This response was drafted before measures to mitigate the impacts of Covid-19 were instituted. Since March, the scale of impact of these measures has brought to line an enormous range of issues, many of which have direct links to how we use public space, for example, a lack of access to green space including for children, and the design of cities restricting the ability to safely social distance (pavement widths). Additionally, demand on health and social care, including women's unpaid care roles has expanded enormously. Women's lesser access to digital forms or participation and increased responsibilities for care and domestic work add to their exclusion from consultation processes.*

*These issues are directly raised in this response, albeit without reference to the exacerbating effects of Covid-19, and we have also attached or reference to our Covid-19 briefing to demonstrate the range of issues relevant for this discussion.*¹

INTRODUCTION

Engender is a feminist policy organisation working across Scotland to secure women's equality with men, and to erode unequal access to rights, power, resources and safety. As such, we welcome this opportunity to respond to the Scottish Government's 'Call for Ideas' on the NPF4.

To date, gender equality has not been integrated into the public planning system in Scotland. However, women experience and navigate public space very differently to men. This is due to gender roles and inequalities that shape patterns of movement, the dynamics of paid and unpaid work, the use of different public services and buildings, drivers of the gender pay gap, and women's lack of safety and security. Design of urban space and infrastructure is rooted in women's exclusion from public life and continues to overlook their needs.

¹ Available at: <https://www.engender.org.uk/content/publications/Engender-Briefing---Women-and-COVID-19.pdf>

Engender produced a Think Piece on creating public spaces for women and men, which is listed as a resource for this Call for Ideas.² We also set out key issues regarding women's equality and planning in our briefing on the Planning Bill.³ In addition to these papers, we submit the following points in relation to the themes identified in the Call for Ideas.

1. What development will we need to address climate change?

- What we will need to do to reach the target of net zero emissions by 2045.
- The opportunities that this could provide to support jobs and the economy.

Globally women are affected disproportionately by climate change,⁴ with gendered impacts in industrialised countries stemming from women and men's different caring and labour market roles, and leading to differential impacts on physical and mental wellbeing.⁵ Action to cut Scotland's emissions is therefore in-keeping with Scottish Government's commitments under SDG5⁶ on gender equality, and its wide-ranging commitments to advance gender equality, including with the NPF4.

In Scotland the revolution in renewable energy, and other technologies and innovations, that is urgently needed to achieve net-zero emissions provides a significant opportunity to address occupational segregation in STEM sectors in Scotland. Clearly, the NPF4 has a major role to play in ensuring the application of this across the planning system. As the spatial expression of Scottish Government's Economic Strategy, with its key pillar of tackling inequality, the NPF4 must integrate women's equality issues throughout its approach to tackling climate change. In order to do, advice on gender mainstreaming should be sought from those with equalities expertise.

2. How can planning best support our quality of life, health and wellbeing in the future?

2.1 Housing

- How many and what types of homes we will need.

² Accessible at: <https://www.transformingplanning.scot/media/1241/tp-gender-inclusive-places-v2.pdf>

³ Engender (2018) Local Government and Communities Committee briefing on the Planning (Scotland) Bill

⁴ UNFCC, Introduction to women and climate change, accessible at: <https://unfccc.int/gender>

⁵ EIGE (2012) Review of the implementation in the EU of area K of the Beijing Platform for Action, women and the environment: Gender equality and climate change

⁶ United Nations Sustainable Development Goal 5: <https://sustainabledevelopment.un.org/sdg5>

Policy and discourse around housing in Scotland is strikingly ungendered. Regarding to housing insecurity, with homelessness at the end of that spectrum, different groups of women are largely invisible. This means that current services and discussions about planning for housing to 2040 do not take account of women's experiences and needs.

Certain groups of women are more likely to experience housing instability, poor housing, homelessness or negative treatment by housing services, including BME, disabled, older and younger women, women with insecure immigration status, women who have been in the criminal justice system, LGBT (particularly transgender) women, women who sell sex, lone parents and unpaid carers.

Engender's report *A Woman's Place: Gender, Housing and Homelessness in Scotland* reviews Scotland's policy landscape, sets out issues faced by women within the housing system, and makes recommendations for change.⁷

The first annual report on Scottish Government's *Ending Homelessness Together Action Plan* includes a range of new actions to address women's invisibility in housing policy in Scotland. Treatment of housing in the NPF4, including with regard to how many houses and what type of housing is needed, along with any other relevant issues, must ensure policy coherence with work on homelessness and put gender and other forms of equality at its core.

2.2 Health

- How we can encourage more people to live in rural Scotland.
- Whether we could target development to address longstanding differences in health and quality of life.

Health and social care services, and decisions over how and where they are delivered, have a major impact on women. Women and girls have greater health and social care needs than men over their lives,⁸ have particular needs and experiences as service users, and various gender inequalities compromise women's health and wellbeing. Examples include:

- Mental health is a highly gendered issue, with depression twice as prevalent amongst women, and low-income women in particular.⁹

⁷ Engender (2020) *A woman's place: Gender, housing and homelessness in Scotland*

⁸ Women's Resource Centre (2011) *Women's Equality in the UK: A health check*

⁹ Scottish Parliament Information Centre (2014) *Mental Health in Scotland*

- Inequalities within maternal and reproductive health persist for disabled, young, BME, LGBT and refugee women, women in rural areas and women with insecure immigration status.¹⁰

Amongst reasons for such inequalities are barriers to access, which design of places and the planning system can help to mitigate.

Unpaid care

Women are also disadvantaged by issues with access to health and social care services as the majority of unpaid carers for children, disabled people and older people across Scotland. This impact is felt by carers in both urban and rural areas, often leading to strains on their mental health and related physical health issues.

In remote and island communities, it can be particularly difficult to access limited primary and secondary health services (such as physiotherapy, hospital-based specialists and treatment for mental health), and social care. Women shoulder the burden of organising and undertaking trips to access these services, which are often complex and costly. Unintegrated public transport services, including ferry timetables, add to this for women who are more likely to rely on them; men are more likely to have access to cars than women. This often mandates overnight stays, causing particular difficulty for women with multiple caring roles,¹¹ and further undermines access to good health and social care.

Planning for health services must include consultation with different groups of women from the outset to ensure that development processes capture ways in which these and myriad other women's health and social care issues are impacted by location, development and, where relevant, delivery of services.

2.3 Inclusivity and diversity

- How places could be more inclusive, diverse, creative, vibrant, safe, resilient and empowering

To create places that are more inclusive, diverse and empowering, communities of women must be involved in planning processes. A great deal has been said about this throughout the progression of the Planning (Scotland) Act. We would like to reiterate the following points with regard to inclusive consultation and barriers to women's participation in community forums and decision-making:

¹⁰ Engender (2018) Disabled Women: Our Bodies, Our Rights, Engender (2019) Scotland shadow report: CEDAW

¹¹ Women are four times as likely to be 'sandwich carers' for children and older people

- Meeting times are often inaccessible for unpaid carers and older people (the majority of whom are women), and women with young children
- Locations are often inaccessible for disabled women (whose needs can differ from those of disabled men's), BME women and women from different faith groups
- Traditional meeting formats can be intimidating in the context of gendered power dynamics, including bullying behaviour
- Lack of women-only spaces are particularly vital for victim-survivors of domestic abuse and sexual violence, and women from certain ethnic or faith communities
- Time-consuming processes, and lack of travel expenses or other remuneration; women are particularly poor in time and resources compared with men.

Equalities experts should be consulted, and full gender and wider equalities impact assessment applied to any plans for community input to NPF4 in Scotland.

3. What does planning need to do to enable development and investment in our economy to benefit everyone?

3.1 Care economy

- What our economy might look like in 2050.
- What the key sectors might be and what infrastructure they may need to support them.

If Scottish Government is to achieve the goal of tackling inequality within its current Economic Strategy, investment must be made in the care economy. Gender equality and inclusion are undermined by definitions of economic 'progress' that do not adequately reflect social policy concerns, or wider commitments to advance equality such as that set out in the Planning (Scotland) Act.

For example, women's unpaid and underpaid care work props up the economy, with unpaid carers saving Scotland an estimated £10.8bn per year (or around a third of the national budget).¹² This care work is as vital to a functioning economy and society as physical infrastructure such as power grids transport networks. However, Scotland's economic strategy does not recognise this, and measurements of

¹² Carers UK (2015) Valuing Carers 2015

economic growth that rely heavily on GDP do not count women's unpaid work. This leads to disproportionate investment in a small number of male-dominated key sectors.

Engender has long advocated for social care to be made a key sector, bringing care within the scope of economic development and skills agencies and enabling a more robust model of investment and development. The NPF4 should engage with undervaluation of social care as part of its commitment to advance gender equality, and consult with care sectors regarding the role of infrastructure planning in addressing this.

3.2 Social care

- Where significant investment sites might be.

The social care system in Scotland is in crisis, leading to breach of basic human rights. People are living without essential support beyond the bare minimum for survival, largely due to chronic underinvestment in the sector. Yet demographic trends mean that demand for care will only increase. The number of adults in need of care by 2026 is projected to rise by 30% in Scotland.¹³ This is a hugely gendered issue, as women are the majority of social care service users, the majority of the underpaid workforce, and the majority of unpaid carers.¹⁴

Currently, it is simply not possible to provide Scottish Government's ambition for and commitment to high-quality, person-centred care with the resources that are available. Care providers are in need of a delivery model that clearly demonstrates how it meets person-centred criteria. Failure to do so will have enormous economic and social repercussions, including in terms of pressure on health services and entrenchment of inequalities for women, disabled people and other marginalised groups.

The NPF4 must take stock of this urgent need for investment in social care services, and consult with unpaid carers, carers' organisations, and professional care workers as to how planning and development around health and social care can contribute to addressing the current crisis in social care.

4. How can planning improve, protect and strengthen the special character of our places?

¹³ Coalition for Carers in Scotland (2017) Manifesto for carers in Scotland

¹⁴ Engender (2020) Submission of evidence to the Scottish Parliament Health and Sport Committee on social care

- What our city and town centres might look like in the future.

Safety and lighting are key issues that emerge time and time again in discussion with women regarding their use of public space. So too, are inaccessible streets and public buildings, and inadequate public toilets, which prevent disabled women, carers, older women, pregnant women, and mothers of young children from accessing spaces in city and town centres.

As highlighted in our Think Piece on gender inclusive places,¹⁵ we imagine a future Scotland where all groups of women have equal access to public spaces, and women feel safe in their town and city centres. The prevalent lack of feeling safe after dark has significant ramifications for women and women's equality, not only in terms of personal security and the strain of managing safety concerns, but also regarding participation in public life, and how, where and when women feel able to spend time outside of their homes. Existing infrastructure, including a lack of accessible pavements, buildings, public toilets and transport further excludes disabled women, women caring for children and long-term unpaid carers from accessing town and city centres.

Public places that were better attuned to women's security and practical needs would open up myriad opportunities for women, for instance facilitating increased participation in political meetings, (and therefore ultimately women's elected representation) community events and other public domains, greater autonomy for disabled women and unpaid carers, and mental and physical health benefits for diverse groups of women, including those caring for small children.

5. What infrastructure do we need to plan and build to realise our long term aspirations?

- What infrastructure we will need in the future.
- Where transport connections will be needed to support future development.

The use of Scotland's transport systems is highly gendered. Women are the majority of public transport users, and the minority of drivers and cyclists. Women also tend to make more complex and frequent journeys due to their roles as unpaid carers and more varied working patterns in paid employment. Scotland's current transport systems, however, do not reflect the different needs of women.

¹⁵ Accessible at: <https://www.transformingplanning.scot/media/1241/tp-gender-inclusive-places-v2.pdf>

Public transport has been predominantly designed to serve commuters who work core business hours on weekdays, with routes running between suburbs and urban centres in a radial fashion. These services benefit men more than women, who are more likely to need a range of orbital transport routes, and timetables that fit with unpaid care work and part-time employment. This has significant cost and time implications, especially in the context of cuts to women's social security and increasingly precarious work, and steep hikes in fares across privatised services. Lack of accessibility on public transport is another gender equality issue, affecting the mobility and isolation of women who care for young children, disabled people or older people. Fears about safety also influence women's decisions around travel. Women cite public transport as a 'hotspot' for gendered abuse and sexual harassment and raise concerns about poorly-staffed services and termini, as well as services that are poorly connected, especially at night.

Many women in Scotland also face multiple disadvantages when accessing transport. BME, disabled, LGBT, older, younger, pregnant and rural women, women of different faiths, women with insecure immigration status, and unpaid carers all have particular transport needs and/or face particular barriers in transport use.

Engender submitted a response to Scottish Government's consultation on the Draft National Transport Strategy (NTS2) in 2019,¹⁶ which sets out these and other issues in further detail. We will continue to advocate that the needs of diverse groups of women must be taken into account as the NTS2 is implemented, as specific policies are further elaborated, and the Strategic Transport Projects Review is developed. We urge policy coherence between the NPF4 and implementation of NTS2, in terms of their high-level equality objectives in the interlinked fields of planning and transport provision.

In our comments on the draft NTS2, we also highlight in detail the vital importance of gender mainstreaming at the strategic level, if objectives and commitments to advance equality are to be achieved.¹⁷ Much of this analysis is relevant to development of the NPF4, including the need to integrate equality issues throughout substantive and financial elements of high-level strategy and policy documents (rather than limiting these to dedicated paragraphs on gender and other protected characteristics, as is often the case), and the urgent need for quality equality impact assessments (EQIA). To have any impact, it is essential that the EQIA for NPF4 informs the development its content, rather than being undertaken as a parallel or

¹⁶ Engender (2019) Response to the Scottish Government consultation on Scotland's National Transport Strategy

¹⁷ *ibid*

post-hoc exercise. We recommend that advice on the NPF4 EQIA is sought from the equalities experts in the public or third sectors, and planning professionals or academics with a focus on gender and planning.

FOR FURTHER INFORMATION

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ABOUT US

Engender is a membership organisation working on feminist agendas in Scotland and Europe, to increase women's power and influence and to make visible the impact of sexism on women, men and society. We provide support to individuals, organisations and institutions who seek to achieve gender equality and justice.