

## **National Planning Framework 4: Call for Ideas**

### **Response from Network Rail Infrastructure Limited: Scotland Region**

**April 2020**

#### **Introduction**

Network Rail welcomes further involvement in the transformation of the planning system in Scotland and the opportunity to contribute to the development of a new national planning framework and national planning policy.

That transport can contribute to the achievement of the high-level outcomes of the Scottish Government is recognised in the National Transport Strategy. The need for alignment between spatial and transport planning; enabling changes to the transport network which ensures it contributes to the national response to emissions reduction; and protecting it from adverse climate change effects of other developments must continue to be priorities for the planning system.

As the owner and operator of the rail infrastructure Network Rail is well placed to contribute to discussions on how the railway can support inclusive growth and how well-developed planning policies can support a joined-up approach to infrastructure development.

Network Rail's response to this Call for Ideas is focussed on those issues which most impact on the railway as critical national infrastructure. Our aspiration is that these issues are taken account of in the national planning framework and in national planning policy. We are not proposing at this stage that any future railway enhancement programmes are included as national developments.

Our responses below have been tied to the key questions asked as part of the Call for Ideas.

#### ***What development will we need to address climate change?***

##### Electrification

The Programme for Government 2019/2020 made commitments for the reduction of emissions of greenhouse gases; with a specific target being set for the railway to be decarbonised by 2035. A significant contribution to this would be through the electrification of the network.

A Rolling Programme of Electrification has been underway in Scotland for some time. Transport Scotland have stated their continued commitment to this; and Network Rail are working to identify the next elements of that programme.

The National Transport Strategy states that there will continue to be a significant programme of electrification of the rail network.

It is expected that the national planning framework and policy will provide strong support for developments which enable this. While many aspects of development associated with electrification benefit from permitted development rights; there will be some which need planning, or other, consents. These works are unlikely to be significant enough in their own right to merit national development status; however the planning system should provide policy and process support at all levels to ensure priority is given to how these cases are dealt with. In addition to recognition of the issues in the national planning framework and policy; this should include how they are addressed in local policy; and could include further permitted development rights; and expedited application processes.

### Critical National Infrastructure

As an important element of the national transport infrastructure; and being a significant factor in determining the scale and location, and success of new development; the railway must be more resilient to climate change. In particular the railway must be protected from flooding and other weather-related impacts. These risks often arise because of new development and at a distance from the railway and are not caught by the statutory requirement to consult Network Rail on planning applications. Involvement in the development planning process is therefore very important and should be as more than a general interested party. It is therefore recommended that Network Rail, and other critical infrastructure providers, become Key Agencies.

Even when the flooding solution is relatively simple in engineering terms; if it cannot be carried out on Network Rail land then delivery may come at a considerable financial and time cost. Consideration should be given to providing Network Rail, and the providers of other essential infrastructure, with compulsory purchase powers for use in certain situations.

Many of the impacts of flooding, landslips, coastal erosion etc result in line closures and therefore must be dealt with urgently. Consent processes and local authority resources are not geared up for these situations. The result can be works progressing without consent and therefore at risk; and local authority advice being provided outwith normal processes. Consideration should be given to expedited processes, perhaps with enhanced fees, to deal with these situations.

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

The need for much greater integration between planning and other consent regimes must be considered. There will always be tensions between enabling development while protecting sensitive environments. And while every case must continue to be considered on its merits there is a need to provide cross-regime policy to support decision making on government priority issues.

As an example; the target being set for the railway to be decarbonised by 2035 will be heavily dependent on the further electrification of the network. Those parts of the network which remain to be electrified include many listed buildings and structures. It is rarely possible to physically, or safely, fit electrification equipment into these locations without relatively radical intervention; such as cutting back station platform canopies or removing traditional lattice footbridges. The planning and listed building consent regimes lead individual authorities to make decisions on a case by case basis; potentially downplaying national priorities in favour of local interests and considerations; and struggling to balance the separate planning and listed building considerations.

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

While the government and planning authorities have a key role to play in this; other organisations are working to ensure the importance of place and design.

For example; in Network Rail we recognise that the importance of stations goes beyond being places where you just catch a train and they have become meeting places; shopping destinations; are important to how surrounding areas work; impact on land values and encourage new development. They are often architecturally, historically and culturally significant. We are actively considering how we can ensure they continue to fulfil all these functions and more. This is set out in the Network Rail and Arup report [Tomorrow's Living Station](#). We have also produced guidance on design ([Our Principles of Good Design](#)) and have established a Design Advice Panel to review significant development proposals at an early stage of their design

Any national policy focus on design should be supported by other initiatives to promote good design. There may be opportunities to extend the remit of the Improvement Service for example.