

NPF 4 Call for Ideas¹

Response by Spokes, April 2020

Spokes welcomes the opportunity to respond to the Call for Ideas relating to NPF4. As an organisation focussed on promoting cycling, our contribution is mainly transport related though we have some additional comments on the context in which NPF4 should go forward that are wider than cycling and transport.

1. What development will we need to address climate change? think about... 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; how places can be made more resilient to the long term impacts of climate change; what climate change friendly places might look like in the future.

The question asks how development can be used to make “places” more climate-change-friendly. As Prof Iain Docherty points out² in a paper on NPF4, transport investment in Scotland in recent years has made it “*easier to move between our cities ... but harder to move within them.*” In other words, it has done the opposite of making “places” more climate-change-friendly.

Prof Docherty concludes, “*We need to stop spending money to enable some people to travel further to do the same things, and instead invest in those interventions that enable everybody to access what they need in a sustainable way.*” In particular, “*We need to travel less overall*” and “*the proportion of travel undertaken by car needs to reduce significantly, and fast.*” This requires “*a fundamental reappraisal of where economic and social activity occurs, so it is accessible, and of how we move between and within these places.*”

Some implications of this for strategic and local planning include...

- Capital investment for major transport schemes is not unlimited and *must be prioritised*. Trunk road capacity expansion should cease *now*, with investment priority transferred to active and public transport within and between towns. This is in line with recent findings from the following official bodies...
 - Jan 2020: Infrastructure Commission for Scotland, *Key Findings Report*³
 - Aug 2019: *Cleaner Air for Scotland Strategy*, Independent Review⁴
 - Dec 2019: Scottish Parliament Information Service, *You Get What You Pay For*⁵
- A Planning Framework is required that does not permit developments which are net contributors to greenhouse gas emissions over their expected lifetime. If the transport element of a development is unavoidably a net contributor to emissions, then other elements of the development must compensate, to deliver net-zero overall.

1 <https://www.transformingplanning.scot/national-planning-framework/get-involved/>

2 <https://www.transformingplanning.scot/media/1282/tp-an-accessible-scotland.pdf>

3 <https://infrastructurecommission.scot/page/key-findings-report>

4 <https://www.gov.scot/publications/cleaner-air-scotland-strategy-independent-review/>

5 <https://spice-spotlight.scot/2019/12/04/you-get-what-you-pay-for-20-years-of-devolved-transport-policy/>

- From the outset (i.e. the planning application) developers *and subsequent owners and operators* must be made to uphold emission reduction measures throughout the lifetime of the development - not promise the earth initially only for that to disappear when ownership changes. New Planning legislation may be needed to enable this.
- Developments must in every case minimise motor traffic usage, and encourage travel by bicycle and other sustainable means. The Utrecht 12,000-person Merwede development⁶ shows what can be achieved with imagination and strength of purpose which is required by central and local government in Scotland and the UK.
- All residential and commercial developments and sales of older property should be required to offer good quality active travel and public transport, information and incentives to encourage the use of these travel modes.

Taking a wider context, the Scottish government has for years promoted so-called “sustainable economic growth.” It has been perhaps convenient for government that the word 'sustainable' has two meanings – one being 'environmentally-aware' and the other being 'capable of continuing.' The usual usage of 'sustainable economic growth' is growth which continues, yet the word 'sustainable' adds an aura of growth which is environmentally respectful. In fact pure growth should not be the nation's primary economic objective – rather, the aim should be a sustainable society and economy. Thus we urge the dropping of the term “sustainable economic growth”, to be replaced by a term such as “sustainable society.”

2. How can planning best support our quality of life, health and wellbeing in the future? think about... where we might want to live in 2050; how many and what types of homes we will need; 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; whether and where we might need new settlements, and regeneration of existing communities; how places could be more inclusive, diverse, creative, vibrant, safe, resilient and empowering.

It is not just a question of where we “want” to live, which is often driven by profit-seeking developers. It *has to be* a question of sustainable development, which generally means *compact development* (whether in cities, towns or villages) with quality internal active travel connections, car use largely based on shared ownership models, and quality public transport between settlements.

National Planning Policy has previously allowed and is currently enabling a concentration of development to be focussed on the central belt and particularly in and around Edinburgh. This seems to be the result of allowing private business interests to determine the location of new jobs with residential developments following. Such an approach is unsustainable. It results in all sorts of bottlenecks, including transport, and compromises the sustainability aspects of national planning policy. For example many Edinburgh residential developments go through despite the fact that the only practical way for residents to get to work, school and shops is by car. In other words planning is playing a part in entrenching vehicle dependency rather than ensuring that there are choices for

⁶ <https://www.theguardian.com/world/2020/mar/15/forward-thinking-utrecht-builds-car-free-district-for-12000-people>

sustainable and active modes as planning policy states there should be.

Development should be much more evenly spread in the country and central belt and for there to be a prohibition on development where public and active travel are not realistic options for residents or workers.

It should be mandatory that good quality advice covering active and public travel options is provided to new residents of developments, whether that is new developments or the intake of new residents or employees in appropriate settings such as student accommodation. Currently Travel Plans are only produced at the initial opening of a development but not when there are new occupants. Owners/operators of buildings should be required to maintain updated travel plans and provide them for all new occupants whether students at the start of the academic year, new employees in a building and all other settings involving new occupants. Such an approach will extend the potential to establish sustainable travel habits before other less sustainable ones become established.

There are existing national planning policies that discourage the move to increased levels of cycling. An example is the complex, expensive and potentially unsuccessful steps property owners face if they need to create cycle storage facilities at the front of their property. For many properties, notably in terraced housing and some tenements, this is the only realistic bike-storage option. Spokes has worked with City of Edinburgh Council to create a factsheet⁷ that helps clarify the rules and makes a successful application more likely. However, a costly planning application is still necessary and in the last resort the householder still faces a possibility of rejection even if the factsheet advice is followed. A much better situation would be to provide permitted development rights for cycle sheds or containers which do not exceed the dimensions specified in the factsheet. The Scottish Government should make this change as part of the current review of permitted development rights.

It is essential that the planning profession have a good grasp of sustainable society and economy concepts. This will enable them to better input as proposals are being framed by developers. We would propose a national training module be developed for this purpose and be a compulsory part of continuous professional development.

3. What does planning need to do to enable development and investment in our economy so that it benefits everyone? think about... what our economy might look like in 2050; how planning can anticipate and respond to the economic challenges of Brexit; what the key sectors might be and what infrastructure they may need to support them; how planning could stimulate and distribute growth; what type, scale and distribution of business and industrial land and premises will be needed; where significant investment sites might be; how economic opportunities could improve, or be accessible from, places where deprivation is concentrated.

Whilst development needs to be compact, that should not normally mean large developments on greenfield sites. Rather, efforts and incentives should be concentrated on the mass of brownfield opportunities within existing built-up communities. These generally provide a strong basis for quality active travel provision and the presence of a whole range of other services in easy reach of the new housing.

Some of our points in response to your 2nd consultation question are also relevant to this

⁷ <http://www.spokes.org.uk/wp-content/uploads/2013/03/Cycle-sheds-factsheet-Word97-v12-FINAL.pdf>

question.

4. What policies are needed to improve, protect and strengthen the special character of our places? think about... what special places will need protection in the future.; what the future might be for our rural, coastal and island communities; how we could unlock the potential of vacant and derelict land; what our city and town centres might look like in the future; whether we need to think about the concept of green belts; how we can get the most out of our productive land; how we can protect and restore peatland; how we can plan blue and green infrastructure; what we can do to protect and enhance biodiversity; and how we can strengthen the character and heritage of our many different places.

Whether city, town or village, the presence of mass motorisation frequently destroys “the special character of places” - turning the special character from one of history, community or landscape to one of mechanical noise, pollution and parked cars. Take Edinburgh's Princes Street, Linlithgow High Street, or the village of Luss.⁸ This must change, including through the reversals in investment priorities and planning and transport policies discussed in answers 1 and 2 above.

As regards discouraging unsustainable greenfield development, legislation could ensure any land value increase arising from re-designating from greenfield to housing or commercial becomes a public benefit rather than being pocketed by the private developers.

5. What infrastructure do we need to build to realise our long term aspirations? think about... what infrastructure we will need in the future; how we can make better use of existing infrastructure capacity, including through innovation; where transport connections will be needed to support future development; where our international gateways, hubs and links will be in a post-Brexit world; how we can sustain our lifelines; how digital connectivity could change the way we live and work; where our natural resources for energy are; and what emerging and future technologies we will need to plan for.

As answered in question 1, capital investment infrastructure priorities must be shifted away from enabling those of middle and upper incomes to drive further and further, often to undertake essentially similar activities to those that could be undertaken more locally.

Instead, there must be transformational improvement in active and public transport within settlements, plus improved public transport between them. This includes measures such as... Heavy investment in making cycling safe and attractive, particularly for shorter (under 5K journeys)

- Measures to make private car journeys less attractive – congestion charge, charges on businesses for workplace *and* customer spaces, on-street parking restrictions, and so on
- To facilitate longer active travel journeys by public transport, cycle carriage (rail and,

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8 <https://www.bbc.co.uk/news/uk-scotland-glasgow-west-51629490>

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