

RESPONSE from SPOKES to NPF3 *Main Issues Report* to: npfteam@scotland.gsi.gov.uk July 2013

A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?
2. How should we provide spatial guidance for onshore wind?
3. How can onshore planning best support aspirations for offshore renewable energy?
4. How can we support the decarbonisation of baseload generation?
5. What approach should we take to electricity transmission, distribution and storage?
6. Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

A NATURAL PLACE TO INVEST

7. Can NPF3 do more to support sustainable use of our environmental assets?
8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

9. Can NPF3 do more to support sustainable tourism?

A. What are the key national assets which should be developed to support recreation and tourism?

B. Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

C. How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

Qn B

We are very pleased to see this proposed national development, and strongly support it, but are very disappointed that it is only about leisure and tourism. Instead, it should be a national initiative which is equally aimed to increase everyday journeys by bike in local towns and cities, in a mutually supportive initiative as in the Spokes proposal to the National Developments consultation [our proposal having been categorised in Annex 1, "suitable for designation"]. In particular **our proposal called for a national initiative comprising one cycle-friendly town or city in each local authority, these to be linked by the national network.**

Our proposal ties in with MIR 4.35, creating an environment which encourages physical activity and particularly with MIR 4.36, reducing the gap between the more and less disadvantaged in society - with local accessibility being particularly important for people with less money.

Our proposal would also work well for leisure and tourism – *and would do so more effectively than the current NPF3 leisure/tourism-only proposal.* Under our proposal, local residents who start to use a bike in the newly cycle-friendly towns would also have the opportunity and the incentive to undertake wider

leisure trips, using the National Network, leading to weekends away and to 'holidays at home.' Conversely, visitors to Scotland using the National Network would have the benefit of cycle-friendly towns along their route, rather than being dumped from the network into potentially hostile local urban cycling environments.

The cycle-friendly towns in each local authority would of course act as encouragement and a form of pilot for each council to extend the National Development by taking similar measures in other towns.

Furthermore, our proposal would support several of the Action Points in the new **CAPS2103**. For example AP3 is about training of professionals in design for cycling. Our proposal would mean that literally every local authority transport and planning professional in Scotland would have a live location to use as a key opportunity in discussions during training, and in implementing the skills learned.

Additionally, the possibility could be considered of combining some or even all of the above proposed cycle-friendly towns with the 'demonstration' towns suggested in the recently issued **Town Centres Review**. This would provide an excellent opportunity to explore the efficacy of different measures to increase cycling and walking as alternatives to car access in our town centres, an objective in line with the spirit of the Review. This should be added to the Key Actions (additional recommendations) on page 14 of the Town Centre Review.

Finally, our proposal was discussed at the Scottish Parliament Cross-Party Cycling Group on 18 June. **Transport and Veterans Minister Keith Brown MSP** was present and stressed that in order to reach Scotland's national climate and cycling targets, the aspects of cycle use which will be most significant are the everyday journeys like travel to work or school rather than tourism and leisure (important though those are in their own right). The Minister therefore expressed an interest in our proposal and asked us to write to him so that he could discuss this with the Planning Minister. ***We attach our letter to the Minister, which we understand can be treated as an annex to this submission.***

10. Can NPF3 do more to support sustainable resource management?

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

- A. What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?
- B. How can NPF3 support our key growth sectors?
- C. Should the Dundee Waterfront be designated as a national development?
- D. Should the redevelopment of the Ravenscraig site be designated as a national development?
- E. Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?
- F. How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

Qn A.

SPOKES fully supports the sentiments in MIR para 4.25. Town centres with a finely grained mix of different uses which cover a wide range of human needs would create the best opportunities for a natural transition from car dominance to more cycling and walking. A shift from car dominance to walking and cycling would support the measures identified in the Town Centres Review to revitalise town centres and make them more pleasant places to live, work and visit.

In a city there should be a range of centres identified, possibly as a hierarchy, to include 'villages within the city'. South Gyle/Edinburgh Park is a good example of how not to create mixed use environments: all the uses are there but the grain is too great, and the service roads too much of a barrier to really connected multiple use journeys by active modes.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

SPOKES welcomes the extended intended role of the CSGN to include the promotion of active travel as one of its aims. However we are disappointed that there are no plans to expand the geographical extent of CSGN. Furthermore, this is an excellent example of investment having cross-cutting benefits relating to many spheres of government policy.

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

Housing development needs to be located where facilities, such as shops, etc are within easy cycling and walking distance. Other barriers to promoting walking and cycling as the first choice for local daily journeys also need to be considered when selecting housing locations.

Additionally, whereas we understand that policy re the location of new development within a Local Development Plan area is mainly contained in SPP, this does not address the wider issue of interconnectivity between centres. So this ought to be addressed in NPF3. In particular, there should be a stronger reference to the Regional Planning frameworks and the location of housing relative to other development/facilities and the connections between these centres by 'higher level' transport links, especially rail links and other public transport opportunities.

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

- A. Is our emerging spatial strategy consistent with the aim of decarbonising transport?
- B. Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?
- C. Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

Qn A

The Spatial Strategy is NOT consistent with the aim of decarbonising transport. The road building program is not being assessed in any way against this criterion, significant 'ordinary rail' proposals have been cut back, air travel is being expanded, High Speed Rail built (between two almost adjacent cities), and provision for everyday carbon-free modes is not included.

The huge road projects are not considered as National Developments in NPF3 despite their massive size and costs – e.g. £3000m to dual the A9; £3000m to dual the A96; £750m for the Aberdeen Western Peripheral Road – thus avoiding the need for them to be assessed against the objectives of NPF3.

Secondly, our national spatial strategy should underpin all infrastructure investment decisions rather than the other way round. NPF3 MIR Paras 4.39 and 5.16 suggest that NPF should influence infrastructure decisions, but in practice it seems that NPF3 is being dictated by the Scottish Transport Projects Review.

The huge road-building program is also inappropriate given that para 1.15 bullet point 3 attaches importance to enhancing the use of existing infrastructure rather than building new. By adapting current road networks for cycling we increase the capacity of those networks and reduce the need for new. Also by investing in the current rail network we would reduce the pressure on the roads for both freight and private transport, again freeing capacity.

Qn C

NPF3 should go further in promoting cycling and walking networks for everyday use, as in our Q9 response above, and for the reasons given there. Cycling and walking provision should be a major significant priority for transport investment within urban areas because of the contribution these modes can make to reducing CO2 emissions and meeting many other objectives of the Scottish Government. Inclusion in NPF3 would demonstrate top level leadership in the promotion of these modes by a strong commitment to delivery of appropriate infrastructure. Currently RPP2 leaves achieving this to CAPS, which in turn places the emphasis for infrastructure delivery onto the Planning System. This therefore must be fully supported within the National Planning Framework.

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

Qn A

SPOKES is concerned about the inadequacy of railway links between major centres, and from major centres to more rural areas. This should be addressed as part of any Spatial Strategy to de-carbonise transport.

Additionally cycling/walking provision should be a major significant priority for investment in transport within urban areas. Inclusion in NPF3 of the SPOKES National Development proposal would demonstrate top level political commitment and leadership to delivery of supporting infrastructure.

16. How can NPF3 improve our connections with the rest of the world?

- A. Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?
- B. Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?
- C. Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?
- D. Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?
- E. Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

Qns C-E

Paragraph 1.15 bullet point 3 indicates that the Spatial Strategy supports the de-carbonisation of transport. This would make an important contribution to achieving the climate change targets. However, as explained in Q14 above, we believe that currently proposed infrastructure projects are unlikely to de-carbonise transport and indeed are likely to move in the opposite direction.

In particular, we do not support the expansion of the main Scottish airports, or HS2 between Edinburgh and Glasgow. These projects are incompatible with climate change targets. They also represent the use of huge sums of money which could be far better invested in other forms of infrastructure which would support climate change targets, boost public health and assist local economies.

Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?
2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?
3. Taking into account the environmental effects set out in the report, what are your views on:
 - a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
 - b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
 - c) The proposed suite of national developments to be included in the Proposed Framework?
 - d) Alternative candidate national developments?
 - e) The policies proposed for the Draft SPP?
 - f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?
5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?
6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

Qn 3(a)

SPOKES fully supports the ambitious Climate Change targets of the Scottish Government but feels that whilst the NPF3 MIR rightly covers how we generate more energy from renewables, it should pay as much or more attention to how we arrange our lives and spatial relationships to reduce energy consumption. The present approach ignores a huge potential on how we manage CO2 reduction. SPOKES believes that without addressing energy use, especially that of transport, we are unlikely to meet the climate change targets.

Cycling and walking are not adequately considered in the draft NPF3 MIR - yet they are effective and cost-effective means of de-carbonising transport, and have few negative environmental consequences, unlike several of the planned road and HS rail mega-projects.

Qn 3(c)

The Scottish Government's hugely expensive trunk road-building programme has been excluded from NPF3. Whilst we do not support this programme, both for its direct effects and because of the alternative possible uses of the money, the programme should be assessed in the context of NPF3 for the reasons given in Q14 above.

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

The use of very large sums of money on infrastructure projects which will predominantly benefit the better-off, notably Edinburgh-Glasgow HS2, trunk road projects costing literally £bn's, and airport expansion, will worsen inequalities. It will enhance opportunities for the better-off, while restricting opportunities for the poor by encouraging dispersion of facilities.

Possibly even more important is the opportunity to direct these huge sums of money to improve instead local accessibility throughout Scotland, thus reducing the gap between rich and poor.