

## RESPONSE from SPOKES to *Draft SPP*

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### PRINCIPAL POLICIES

#### 1 Sustainable Economic Growth

Y N

Do you think that the measures outlined in paragraphs 15 to 23 are appropriate to ensure that the planning system supports economic recovery and sustainable economic growth?

Are there other measures to support sustainable economic growth that you think should be covered in the SPP?

Y

#### The principle of (?)sustainable economic growth

Before commenting on measures, we express our concern over the principles and objectives which are taken for granted in the question, as well as their lack of clarity. In particular, we note the new emphasis on sustainable economic growth and are concerned that this will over-ride social and environmental concerns. We are also confused by the (seemingly) interchangeable use of the terms 'sustainable economic growth' and 'sustainable development' which is what has been commonly used in Planning docs in the past. Additionally, is 'sustainable economic growth' economic growth which is able to continue or is it economic growth which pays full attention to environmental sustainability. These issues need to be clarified in the document, as the meanings are very different indeed.

#### Economic growth, economic concerns, and Section 75

We note that economic concerns are to be Material Considerations, and we are especially concerned about the provision in para 23 which indicates that planning obligations (and we assume other s75 agreements) should not adversely affect the viability of a development.

This concerns us because CAPS Action Points AP2 and AP3 main method for the delivery of appropriate urban infrastructure relating to new developments (both on and off site) is via the Planning System [AP2 via Local Development Plans, SPP para 194; AP3 via Designing Streets]. But developers may be concerned about costs: on-site provision can be expensive to implement and it appears that off site cycle infrastructure is expected to be met through s75 agreements (this being the only planning mechanism for this). The concern therefore is that the cycling infrastructure required to support the 10% of all journeys being made by bike by 2020 won't be delivered by a system that is hampered in drawing down s75 agreement funding by this provision in para 23.

This is also vital in relation to carbon emissions given that RPP2 (para 7.4.34) relies on CAPS to reduce transport CO2 emissions by increasing cycle use.

Our concerns over restrictions on the use of Section 75 agreements are reinforced by the Town Centres Review, published 4<sup>th</sup> July 2013 by the Scottish Government. The Review identifies Section 75 agreements as being a barrier to the development of viable town centres. Bullet point 2, page 14 of that report recommends that costs of developer contributions are reduced. We are concerned about how infrastructure to support town centres will be funded and

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consider that walking and cycling initiatives provide value for money investment as well as making town centres more generally accessible and pleasant places to live, work and visit. Alternative means of incentivising town centre development rather than out-of-town should be used: for example charging developers for numbers of car parking spaces provided over a certain minimum level.

### Identification of funding for cycle infrastructure

We are further concerned about the apparent requirement in para 194 on Local Authorities to not only map required cycle infrastructure in the LDPs but also to identify funding for this within the Plan. This seems totally inappropriate: the role of planning is to identify land use issues. And, in practical terms, current unavailability of funding might prevent the inclusion of cycle infrastructure which is vital in planning and transport terms - yet funding might become available at any time [for example the recent use of unplanned 'windfall' government funding to widen and resurface North Meadow Walk in Edinburgh]. In any case, the achievement of properly funded cycle infrastructure of the scale needed for the transforming vision of 10% of all journeys by bike requires significant investment from the public purse. This investment would itself drive local economic revival and this contribution has been seriously overlooked when considering sustainable economic growth and/or sustainable development. The delivery of identified necessary cycle routes should be the subject of a separate action plan which would include the discussion re funding. Cycle Infrastructure is not an optional 'add on' any longer. It is not a luxury: it needs to become an essential part of the transport mix and for this to happen there needs to be urgent priority given to investing in the development of appropriate infrastructure. Unfortunately the provisions of para 196 where commercial provision of transport to service new developments is discussed is not really available to cycle routes and so there would be even more pressure to use s75 agreements to fund these, and again this is at risk because of the provisions of para 23.

## 2 Location of New Development – Town Centres

Y N

Do you think that local authorities should prepare town centre health checks, as set out in paragraph 55?

Y

Are there other health check indicators you think should be included in the SPP?

Y

We agree that having a finely grained mix of uses in close proximity is one way to reduce the need to travel and to prioritise active travel and sustainable options (para 43 bp 6). Also by encouraging a switch from car travel to travel by bike and walking you make better use of existing infrastructure (as required in para 43 bp 1). We feel therefore that one of the 'health check' indicators for town centres should be how accessible they are by foot or bike. This indicator would ideally be year on year increases in the number of people in the town center on foot and bike, or it could be a more concrete measure of (eg) how much cycle parking is provided within the town centre.

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### 3 Location of New Development – Town Centres

Y N

Do you think that local authorities should prepare town centre strategies, as set out in paragraph 56?

Y

Preparation of Town Centre strategies should include a specific reference to supporting Active Travel modes. This should include consideration of all the barriers to achieving more journeys by active modes, including design-led management of motor traffic, better street design, proper placemaking that puts people first, as well as the more obvious interventions of cycle parking, cycle routes and pedestrianisation.

By use of the above we feel that the aspirations of vibrancy as laid out in para 60 may be achieved.

### 4 Location of New Development – Town Centres

Y N

Do you think the town centre first policy should apply to all significant footfall generating uses and the sequential test be extended to this wider range of uses, as outlined in paragraphs 63 to 67?

Y

An alternative would be to apply the sequential test to retail and 'all' leisure development, no longer limiting leisure to 'commercial' development. Do you think this is the appropriate approach?

There is a balance to be struck between attracting as many uses as possible to the town centres but not to have them housed in units that present huge blank street fronts as this then widens the grain too much, and creates 'dead spots' off-putting to pedestrians.

The scale of the development relative to the surrounding uses is the important factor, along with steps to ensure the street structure is maintained and that blank walls etc are not introduced into an area which is looking to be vibrant. Leisure facilities can be designed into these sorts of spaces: DCA in Dundee is a very good example of an active street front with the larger scale requirements of the auditoriums and galleries placed away from the street.

Town Centres should also seek to incorporate housing development as part of the wide range of finely grained mixed uses.

Although not covered in this document, Spokes also strongly believes that the government should introduce workplace charging based on the number of car parking spaces over a certain minimum number. This measure would strongly encourage development in sustainable locations, and furthermore would mean that developments in sustainable locations prioritised accessibility by bike, foot and public transport and did not allocate excessive amounts of precious land use to car parking.

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- 5 Location of New Development – Rural Development** **Y** **N**  
Do you think the approach to spatial strategies for rural areas outlined in paragraphs 68 to 71 is the appropriate approach?

We strongly support provision of housing, shopping, commercial and other facilities in or adjacent to existing communities (rather than in isolated locations) in order to strengthen the viability of these communities, with a particular emphasis on those communities which are rail-connected or where a new rail station can be provided

We have often pointed out that the 1981, 1991 and 2001 censuses show a pattern whereby valuable cycling traditions in rural areas are being lost, and we suspect this may well result in part from dispersion of facilities (as well, of course, as the widely acknowledged increasing dangers of rural roads). Development in and around rural towns, no less than in urban areas, must make determined efforts to enable safe and welcoming conditions for bike accessibility.

[Qns 6-13 N/A]

### NATURAL RESOURCES

- 14 Green Infrastructure** **Y** **N**  
Do you think that the provision of green infrastructure in new development should be design-led and based on the place, as set out in paragraph 163? **Y**   
An alternative would be to continue with a standards based approach. Do you think this is the appropriate approach?  **N**

We agree green infrastructure should be design led, taking account of how that space may be used to its best effect (for biodiversity, flood risk mitigation, recreation and walking and cycling infrastructure), and responding to the specific opportunities and threats of the site in question. However we would remain concerned that this is one area where developers could seek to reduce their costs and feel again that there needs to be strong leadership and commitment to the delivery of high quality green infrastructure.

[Qns 15-22 N/A]

- 23 Overall** **Y** **N**  
Do you think the proposed new structure and tone of the draft SPP is appropriate?

It is better laid out and more clearly a policy document than the last version. Its structure is therefore better. However its tone displays an over-emphasis on economic growth (with no definition of the meaning of 'sustainable economic growth') and we are very concerned that this will be at the expense of environmental and social concerns.

[Qns 24-28 N/A]

29 Overall

Do you have any other comments? If so, please specify the relevant section/para.

**Concern over the questions asked**

Spokes is concerned about the restrictive nature of the questions posed. For example, as expressed in our answer to Q1, there has not been a proper consultation regarding the change of purpose from 'Sustainable Development,' which is an internationally recognised phrase, to 'sustainable economic growth,' which itself is not defined. In a fair and open consultation respondents ought not to be having to make a choice between answering the questions as set or raising their valid concerns about the principles underlying the document.

**Absence of questions on the movement section**

We are concerned and puzzled that there are no questions relating to the movement section [paras 188-206], and we make the following comments...

1. There is much reference to significant travel-generating uses, but 'significant' is not defined. This needs to be clarified.

2. Car parking standards remain as in the past: these ought to be getting progressively reduced in order to encourage a modal shift to more sustainable means of travel. This will have many benefits: car parking takes up a lot of land; hard surfaces create problems for drainage; etc.

3. Related to the above, at Scottish planning policy level cycle parking standards are only made in relation to car parking provision. This needs to be changed. We need cycle parking to be included at all new development whether or not there are car parking spaces, and for a far wider range of uses than just leisure, commercial and retail. Cycle parking provision in residential developments needs to become a Scotland wide standard, and not only be compulsory in 'gold standard' developments. We feel that the provisions of para 204 to safeguard and enhance cycle parking and storage is unnecessarily compromised by adding 'wherever possible', and this caveat should be removed. Consistent provision of cycle parking and storage facilities will help promote the extensive cycle ownership required in CAPS (Annex G, Core Outcomes and Indicators, No1).

Furthermore, bicycle storage needs to be considered in relation to existing as well as new developments, and planning controls need to foster solutions rather than hampering them as currently sometimes happens. We have encountered in Edinburgh serious problems in terms of cycle storage for citizens whose only option for bicycle storage is in a front garden. The rules for permitted development need modified to ensure that sheds of a modest size and design for bike storage are normally permitted in front gardens where there is no alternative storage area. [Spokes has further detailed documentation and suggestions on this issue, available on request]. Tenements and flats are an even more obvious case – Edinburgh is currently piloting on-street secure overnight bicycle storage, and this needs to become a wider urban initiative, supported by planning policy where necessary.

The proposed core indicator in Annex G is deficient in not recognising that bicycle ownership is very difficult for many people due to the nature of their

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accommodation.

4. While we welcome the requirement that Local Authorities should identify and map new cycling and walking infrastructure within their development plans we are concerned that there is no proper standard of what constitutes cycle infrastructure. Some is badly designed and poorly implemented, which does little to promote cycling or to ensure the safety of cyclists. There should be minimum standards, and we propose a commitment to refresh Cycle by Design in the light of current thinking on the design and delivery of cycle provision.

5. It is disappointing that para 196 when discussing the location of significant travel-generating uses does not refer at all to cycle facilities (either parking or access). This should be amended to again indicate the importance of these modes in the transport mix.

6. We are cautiously pleased about the new emphasis on providing for travel by active modes, but have concerns re how the policy is implemented. Within-site provision to encourage walking and cycling is supposed to be delivered via Designing Streets, but 5 years after it was adopted it is still not being implemented properly and is failing to deliver these sorts of benefits. Linkages out to wider networks, and included in Design and Access Statements, are often included in early plans but later removed as a result of consultation responses from those in neighbouring properties.

More generally, we welcome the continued priority order [para 192] “*walking, cycling, public transport, cars*” for development locations, but are concerned that this often does not seem to happen in practice, despite appearing in the currently existing SPP [for example, paras 155 and 169].

So, as documents, both SPP and Designing Streets are basically saying the right things, but the policy is not delivering: this is an issue that must be addressed. We would like to see more leadership and commitment so that planning officers can demand compliant applications from developers knowing that they will be supported by their councillors. Councillors need to be confident that applications that are rejected on these grounds will not be granted consent at appeal. By now Designing Streets should be getting implemented as a matter of course, and it should not be down to campaigners/interested individuals to be submitting basic design issue submissions for every application. It is, however, heartening to see that this is partially acknowledged in CAPS, where AP3 discusses training for the relevant professional groups.

### **Location of development in relation to accessibility**

Location of housing development is not really discussed in the draft SPP. There is lots of discussion re land supply etc, but nothing about accessibility, accessible locations and proximity to a range of uses. Yet for the government vision of 10% journeys by bike by 2020 these issues need to be specifically emphasised within the SPP.

Development plans should map required cycle infrastructure, as indicated in para 194, but should also identify barriers to cycling that would prevent cycle use from proposed development sites and set out how these would be addressed. Where such a barrier cannot be resolved, this should be a material consideration.