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30.11.2013

To: Derek Mackay MSP, Local Government and Planning Minister

Cc: Keith Brown MSP, Transport & Veterans Minister

Cc: [re SP CPCG] Alison Johnstone MSP, Jim Eadie MSP, Claudia Beamish MSP, Sarah Boyack MSP

Cc: Malcolm Fraser, chair of the SG National Review of Town Centres

Dear Minister

National Review of Town Centres Town Centre Action Plan – the Scottish Government's Response

We note the publication of this document¹ on 7th November 2013, and wish to raise with you a number of comments and concerns. In particular, we feel that a parliamentary debate ought to be convened to discuss the measures proposed in the Action Plan and to address the concerns below, which are common to other organisations as well as our own.

We are delighted that there is included an emphasis on strengthening town centres, including a 'town centre first' approach for a wider range of uses. However we are very dismayed that this is not supported by more emphasis on the creation of environments which will encourage and facilitate Active Travel. Much recent research has provided evidence of the value of pedestrian and cyclist custom to services, and we feel this has been overlooked in this document.

In our response to the draft SPP² we supported the recommendations of the Town Centres Review, including the idea of demonstration towns where initiatives could be trialled. We suggested that this should include demonstrating initiatives to support and encourage cycling and saw this as a stage towards our proposal³ for a separate National Development for cycling towns as part of NPF3. Indeed, during and after his June appearance at the *Scottish Parliament Cross-party Group on Cycling*, Transport and Veterans Minister Keith Brown MSP expressed agreement with our NPF3 proposal and asked his officials to pass this on to their planning colleagues. We are very dismayed to note that this is not included in the proposed range of initiatives to be tried in the demonstration towns and that the role of active travel in general receives such poor attention.

Further it is extremely disappointing that, even where you have included reference to developing walking and cycling routes etc, this is a 'long term' timescale. This surely is wholly incompatible with the government's own desire for 10% of all trips to be by bike by 2020 [see bullet 3 below]. If cycle trips are not to be fostered in town centres, where journey distances are short, what hope is there to reach the government's 2020 ambition? This is a very serious failure in joined-up thinking.

We further urge you to reconsider these matters because our proposal ties in so effectively with several main themes of the Action Plan, as discussed below...

1 <http://www.scotland.gov.uk/Topics/Built-Environment/regeneration/town-centres/review/action-plan>

2 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2012/09/1306-SPP-Spokes-response-v5-final-name-added.pdf>

3 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2012/09/1306-NPF3-Spokes-response-v6-final-Name-added.pdf>

1. **Vibrant Local Economies** : “we need these to be able to adapt and be resilient to future change”

Active travel is a way of future-proofing town centres against the continuing increases in oil prices which make car travel, and even public transport, increasingly unaffordable for many people – and we have already seen evidence of this. By supporting initiatives *now* which will address the affordability of access to town centres we would be making our town centres more resilient.

2. **Enterprising Communities**

The placemaking agenda is central to how vibrant and enterprising our town centres become, but is not highlighted in this section. Active Travel supports Living Locally, which in turn encourages more community led activity and involvement. Additionally, much recent research highlights how valuable the pedestrian pound⁴ is to local high streets and businesses. This should be supported and facilitated by creating environments that supports active travel.

3. **Accessible Public Services**

We are pleased that this section includes reference to the place agenda, acknowledges how public realm enhancements can support active travel, and confirms the role town centres play as Integrated Transport Hubs. We are therefore astonished that reference to the role of walking and cycling is so brief and that provision of supporting facilities and infrastructure is only seen as an aim in the long term. It is quite essential that this issue is considered right at the outset, not least because it is difficult to retrofit good workable facilities.

An early timescale would also send a strong positive message about the government’s oft-questioned determination to fully support a shift in travel modes to cycling and walking as part of the 10% ambition set out in *CAPS*⁵, re-iterated in the government's *Obesity Strategy*⁶, used as a milestone in the *RPP*⁷, and firmly re-iterated as a target by *Deputy First Minister Nicola Sturgeon* in evidence to Parliament's ICI Committee⁸.

4. **Pro-Active Planning**

We are pleased to note the mention of developing a Master Planning Toolkit, and that this will include guidance on specific transport and design details. However we note the recent report⁹ on the disappointing implementation of *Designing Streets* and would like to see strong emphasis given in this toolkit and guidance to its implementation. Furthermore, Active Travel transport modes must be well enshrined in any guidance that is produced.

Conclusion

In summary, we welcome this document, but are concerned that Active Travel initiatives that could support and enhance it are given wholly inadequate consideration and priority. A parliamentary debate should be convened to discuss the measures proposed in the Action Plan and to address remaining concerns, including those expressed in this letter.

Yours Sincerely
Dave du Feu
for Spokes Planning Group

4 <http://www.livingstreets.org.uk/make-a-change/library/the-pedestrian-pound-the-business-case-for-better-streets-and-places>

5 <http://www.transportscotland.gov.uk/road/sustainability/Cycling-and-Walking>

6 <http://www.scotland.gov.uk/Publications/2010/02/17140721/0>

7 <http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets>

8 <http://www.scottish.parliament.uk/parliamentarybusiness/28862.aspx?r=7957&mode=pdf> [see column 1076]

9 <http://www.scotland.gov.uk/Topics/Built-Environment/AandP/Skills/Designingstreetsresearch>