

29 January 2014

NPF3 : Proposed National Planning Framework 3 **Submission from Spokes to the Scottish Parliament ICI Committee**

A. Main themes of our response

Our comments on the NPF3 Proposed Framework¹ largely concern the proposed *National Long Distance Cycling and Walking Network*. First, we outline the 3 main themes of our response – one positive and two disappointing.

- ◆ **Inclusion of the National Cycling and Walking Network.** We strongly welcome the inclusion of this National Development, which marks a big step forward for the Scottish Government from NPF2 where submissions from ourselves and others highlighting the potential of a national cycling and walking initiative for its economic, health and other benefits were rejected. We particularly welcome this new statement in para 5.26, “...we will encourage local authorities to identify one walking-friendly and cycling-friendly settlement where accessibility will be greatly improved...” albeit we also note [B below] some very major weaknesses in this paragraph.
- ◆ **The Network is seen in NPF3 as primarily for tourism and recreation rather than for active travel – this prioritisation should be reversed.** The Spokes submissions at earlier stages of NPF3 development [Candidate National Developments² and Main Issues Report, MIR³] recommended a national initiative comprising one cycle-friendly town (or city area) in every local authority, these to be linked by the national network. If the government is serious about its CAPS⁴ ambition for 10% of all trips to be by bike in 2020* then, without in any way underplaying the value of tourism, everyday active travel is the key – as was clearly stated by **Keith Brown MSP**, Minister for Transport and Veterans, to the Parliament's Cross Party Cycling Group on 18.6.13. Our subsequent letter to the Minister goes into the arguments further.⁵ The scale of effort now needed to attain the 2020 ambition means that any national cycling initiative must have everyday utility cycling as a primary element.

*Deputy First Minister **Nicola Sturgeon MSP** told Parliament's ICI Committee⁶ “... it is worth reflecting on the fact that we are committed to the 10 per cent target ... targets are not easy to meet or there would be no point in setting them, but we have commitment and determination. We have a lot of work to do throughout Scotland in order to deliver ...”

- ◆ **The stages and actions proposed for the Network in NPF3 are seriously inadequate, reflecting insufficient joined-up thinking within government.** The 2020 CAPS target, let alone common sense, means that other policies and strategies – such as NPF3 and the Town Centres Action Plan – should be coordinated with that objective. Instead, NPF3 adds little urgency, even suggesting [5.26] that local authorities need not implement their first “cycling-friendly settlement” until 2030! Furthermore other proposed NPF3 NDs appear not to have been audited for compatibility – for example, the Dundee Waterfront [see D below].

B. Deficiencies in the Walking & Cycling Network National Development [WCND]

This National Development should in our view comprise one (or more) cycle/walk-friendly town(s) in each local authority, these also forming hubs on a national network. Only such prioritisation will enable the National Development to make its proper contribution to a far wider agenda than recreation and tourism alone - and to the government's 10% CAPS cycle use 2020 ambition. Specific deficiencies in the current proposal and in its discussion in the NPF3 Framework document include..

- ◆ **Basically a rural network** - the document treats the WCND largely as rural, rather than impacting right across Scotland's cities, towns and villages. In chapters 4 and (especially) 5 the WCND is referenced in the rural section only, not in the cities section. [Although the Central Scotland Green Network is referenced under cities in chapter 4].
- ◆ **Severe lack of ambition** – We greatly welcome [5.26] the government's wish for a cycling/walking-friendly “settlement” in every local authority. **BUT** councils will only be *encouraged* to develop *one* such settlement by 2030 – and this is only in the rural section, so presumably does not apply to cities or larger towns. A weaker way of approaching a great idea can hardly be imagined! - and this is far from compatible with the 2020 target.
- ◆ **Paths but not roads and streets** – the recreational dominance of the WCND is highlighted by the continual references to links with core paths networks and absence of references to the road system. Path links are of course to be welcomed, but paths are very limited in extent compared to the road system, which leads from every A to every B, and usually by a relatively direct route. To encourage large numbers of people to cycle, safe, welcoming and direct travel on the road network is vital, in addition to any path opportunities. This means high quality infrastructure, often segregated, on main roads, particularly initially in urban areas, and slow speeds on residential and shopping streets.
- ◆ **Transport emissions** - the document recognises the necessity to reduce transport emissions, and the need to raise cycle use and (implicitly) to cut car use [para 5.5] – yet the WCND does not effectively cover the areas of greatest potential modal shift – cities and towns. The 2011 census figures for Edinburgh⁷ show modal shift is possible and suggest that it is most easily commenced in urban areas.
- ◆ **Tourism-only justification** - the main reference to the WCND, section 4.23, justifies ND status solely in terms of tourism. Some add-on benefits are noted, though again almost exclusively tourist and recreational.

C. Low Carbon Living [Chapter 3]

This chapter, dealing with energy production and use, almost completely neglects one major use of energy – namely for transport. In terms of active travel the heading above para 3.15 says “*Cities will be exemplars of low carbon living*” but that is not reflected in the text in respect of a shift to walking and cycling. The 3rd sentence of 3.15 should be rewritten to refer to the “*Key challenges*” of retrofitting housing energy efficiency *and* of attaining modal shift from motor transport to active travel.

D. Chapter 6 - Delivery

The description of the CWND [6.6, ND8] should be revised substantially, as in our comments above, so that it comprises one or more cycle/walk-friendly towns or city areas in every local authority, linked by a national network. The towns as well as the routes should be completed, or well on the way, within 5 years. The infrastructure would comprise not just core paths and offroad routes but direct, safe and welcoming urban routes based on segregated infrastructure on main roads and slow speeds elsewhere.

Implementation of the Town Centre Action Plan [6.10, action 5] should incorporate active travel initiatives as an integral requirement from the start – not, as currently proposed, with a 3-year 'long-term' timescale. See our letter⁸ to **Derek Mackay MSP**, Local Government and Planning Minister, and the subsequent letter⁹ from the Scottish Parliament's Cross-Party Cycling Group.

Prior to delivery, all NDs should be audited for compatibility with sustainability principles and, if necessary, made compliant. In particular, it appears that the **Dundee Waterfront** proposed ND, starting with a virtually blank page, apparently builds in no cycle facilities (and, we think, no links to the town or to the existing riverside route). The Waterfront promotional video¹⁰ shows no cycle facilities and indeed shows cyclists using a 4-lane road [video times 1:20 to 1:40]. As one might expect in a promotional video, the road has very little motor traffic when the cyclist is present! This ND is supposed to demonstrate regeneration principles and is gaining a high profile with its proposed NPF3 status. It will be used as an exemplar for professionals and for planning students. Therefore it should include not just cycling facilities, but the latest thinking on cycling facilities. To exclude cycling provision entirely from such a government-backed National Development would make a real mockery of the government's intentions on cycling, of its 2020 CAPS target and, most of all, its protestations of joined-up thinking. *This must be rectified.*

E. Annex A – National Development 8

This description, and the justification, of the CWND should be modified in line with our comments in [D] above. The long-distance routes currently proposed should be retained, but urban hub proposals added to that list for as many Scottish local authorities as is currently feasible, with an intention to include every local authority in the urban hub proposal list within 12 months.

F. Timeline

The following should be added to the timeline [p58-59] ...

- ◆ 2019 – Initial phase of WCND long-distance routes and initial cycle-friendly towns complete
- ◆ 2020 – 10% of all trips in Scotland will be by bike, as in CAPS

G. Incompatible Transport Proposals

We comment briefly on another aspect of the draft Framework, not specifically related to the CWND, which concerns us greatly...

As outlined in our earlier NPF3 MIR submission there is an incompatibility between the government's road/air capacity enhancements [5.16 confirms that the road building projects are in part to increase capacity] and its commitment to sustainability and decarbonisation. Furthermore, despite their huge costs, road projects such as the £3bn A96 dualling are not considered as National Developments and are therefore not subject to NPF3 assessment against other options, or to detailed public and parliamentary scrutiny.

This disjunction is very apparent, for example, in the Edinburgh feature [page 9] where some aspects of connectivity (active travel and the Borders Railway) are justified largely in environmental terms whilst others (Forth Crossing and Airport expansion) are justified largely in economic terms, regardless of sustainability considerations. In a holistic plan for a decarbonising country, all should require significant environmental justification.

Another example comes in 5.15. The government wishes “*to make rail travel between cities quicker than by car*” and yet, not mentioned in NPF3, it proposes to keep extensive single track rail on the routes parallel to the A96 and A9, whereas these roads are to be fully dualled.

H. Questions by ICI Committee

The Committee also asked for comments on some specific topics. Our responses to several of these questions are in our submission above, as follows...

- ◆ **Cities as a focus for infrastructure development** – see [B] and [C]
- ◆ **Transport infrastructure** – see [G]
- ◆ **Sustainable transport and climate change** – see [C] and 4th bullet point of [B]
- ◆ **Ensuring infrastructure is better coordinated with planned development** – see [D] paras 2 and 3.

We trust these comments on the Draft Framework are of value to the Committee.

Dave du Feu
for Spokes

1 <http://www.scotland.gov.uk/Publications/2014/01/3724>

2 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2012/09/1211-NPF3-spokes-submission.pdf>

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

4 <http://www.transportscotland.gov.uk/strategy-and-research/publications-and-consultations/cycling-action-plan-2013>

5 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2012/09/1306-NPF3-letter-to-KeithB.pdf>

6 http://www.spokes.org.uk/wordpress/wp-content/uploads/2013/02/121107-ICI-cttee-col-1076.-28862.aspx_.pdf [col 1076]

7 http://www.spokes.org.uk/wordpress/wp-content/uploads/2014/01/1401-Census-Edinburgh-travel-analysis-PIB_No_1_Jan_14.pdf

8 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2012/09/1311-letter-to-Derek-Mackay-v3.pdf>

9 <http://www.spokes.org.uk/wordpress/wp-content/uploads/2012/09/1401-AJ-to-Minister-for-Planning-re-Town-Centre-AP-7.1.14.pdf>

10 <http://www.youtube.com/embed/xEmYYebJsUM>