

Draft NPF4 National Planning Framework

Scrutiny by Scottish Parliament Committees – Request for views from the public

Spokes response, 8 Jan 2022

Note: the consultation is very extensive (as is the NPF4 document). Spokes responded only to those questions that most concern us. The full pdf of our response, as returned to us from the online consultation, is [here](#). However, since it was automatically generated in a not very reader-friendly form, our responses are pasted in more clearly below. We only list the questions to which we responded.

What is your view on the Sustainable Places section?

We are pleased to see the inclusion of "reduce the need to travel unsustainably" as part of this section. This is key to ensuring that our built spaces are sustainable, accessible and equitable for everyone, including older people and disabled people. Furthermore it will be critical to achieving the government's commitment to reducing car-km by 20% by 2030.

What is your view on the Liveable Places section?

We are supportive of the concept of 20 minute neighbourhoods and are pleased to see this included in the Liveable Places section. We are also pleased to see "We want to make better use of our spaces to support physical activity" as part of this section. Investment and the practical application of sustainable transport modes such as cycling will complement this aspiration.

What is your view on the Productive Places section?

We are pleased to see reference to a wellbeing economy, which is an economic model that rejects growth at all costs and instead focuses on serving people and communities first and foremost, offering a path toward greater social well-being and environmental health.

This section states "green investment is a key priority for the coming years", however the definition of "green investment" is not clear here. What does this mean in practice?

What is your view on the Distinctive Places section?

Distinctive Places states that future developments will be "easy to move around", but does not back this up with anything meaningful.

There is mention of "reshaping future city and town centres", however if these city and town centres are new then we suggest that the language should be about shaping, and not reshaping.

It would be good to include mention of movement here - how our towns and cities could be shaped to allow everyone to move about easily by sustainable means and without the pollution, noise and danger imposed on citizens when places allow significant car access. People in future settlements, including people with mobility considerations, should not normally need access to a private car.

The strategy also does not mention learning from failures. It only talks about enhancing successful places. We would argue there is much to be learned from failure and that previous mistakes related to place should not be repeated in the future.

What is your view on the 'Action areas for Scotland 2045' section?

It is positive to see focus on 20 minute neighbourhoods and investment in active travel networks throughout the Action section. However, we feel there is still emphasis given to roads investment that would be to the benefit of private vehicles and to the detriment of sustainable and active travel.

This feels unsustainable and at odds with much of the Scottish Government's current rhetoric and policy-making around the aimed reduction of car trips, including the commitment to reduce car kms by 20% by 2030. It is well known that investment in roads generates additional trips, a phenomenon known as induced demand. Action areas in general should be focusing on sustainable transport as the number one priority, helping to reduce trips by vehicle as much as possible. Emphasis should be given to active travel networks, mobility hubs and public transport infrastructure over that of road network upgrades.

It is also worth noting that key named transport projects are mentioned throughout all action areas with respect to transport - specifically trains, as well as road upgrades. There are no named projects or routes mentioned with respect to the National Walking and Cycling Network other than one route from Moffat to Eyemouth. Why is this? We feel it is important to include named proposed upgrades and improvements for this network alongside other proposed transport projects - they are just as important.

Do you have any other comments on the Action areas for Scotland 2045 outlined in NPF4?

Overall, the Action areas broadly support Spokes' objectives to enable more people to safely cycle for everyday trips. We recognise that this is a strategic document and therefore doesn't get into fine details around sustainable transport in the wider context of planning in specific areas. As already mentioned, it is good to see focus on modal shift away from the car, 20 minute neighbourhoods and active travel networks. We would be keen to see more inclusion of mobility hubs, on-demand transport and last-mile logistics as part of the planning solutions to enable more sustainable transport choices for individuals and businesses in both urban and rural areas.

An important point is that there is mention of "travelling unsustainably" sprinkled throughout, but it is not made clear what this encompasses. What is the definition of this in practice? Would the same number of short car trips currently taken by ICE vehicles and swapped out to EVs be considered travelling sustainably? It's obvious that car trips swapped from ICE to EV are still unsustainable in many different ways (congestion, lack of physical activity, road safety etc). Our view is that sustainable transport is accessible, environmentally sound and equitable, so would mean walking, wheeling, cycling and public transport.

Please provide your views on each of the National Developments in the text boxes provided below

National Walking, Cycling and Wheeling Network

There is reference to everyday trips here for which the National Walking, Cycling and Wheeling Network is vital and we are very pleased to see, but it is also important for recreational activities. The network is key for the associated economic benefits in local communities that come from recreational activities and should also be included as part of the network's strategic importance in the "need" section.

This section also doesn't include any named parts of the network that are being proposed for improvement or creation. It would be beneficial to include named routes here so they are enshrined in policy.

The National Walking, Cycling and Wheeling Network should also help to support 20 minute neighbourhoods, yet this has been omitted from the section. This should be mentioned as part of the network's outcomes/benefits.

Urban Mass/Rapid Transit Networks (Aberdeen, Edinburgh, Glasgow)

Spokes supports public transport and specifically expansion of Edinburgh's tram system. However, despite warnings from ourselves and others, the first Edinburgh tramline was installed with virtually zero consideration for cyclists (or pedestrians). It was also under a design and build contract where amendments could only be made at exorbitant cost.

The basic tramline layout is therefore particularly cycle-hostile and as a result literally hundreds of people have attended A&E following bicycle/tramline crashes (research by Prof Chris Oliver) some with life-changing injuries, many suffering days or weeks of pain off work, and of course there has been a tramline-related death. We have been convinced from the outset, as we unsuccessfully tried to impress on the promoters in the early planning days, that a different tramline layout, along the same route, would have brought far fewer injuries - and indeed Edinburgh Council is now installing a series of measures which attempt to ameliorate the position at some of the worst locations, although sadly the basic layout can not be changed.

Therefore the wording of this national development must be very explicit that mass transit expansion must be designed holistically with associated active travel provision, to ensure safety as well as boosting active travel. Specific reference must also be made to ensuring segregated cycle provision alongside tramlines and provision of safe crossing points of the tramlines - and indeed for pedestrians. Although by far the greatest number of tramline injuries have been to cyclists, Prof Oliver's research shows that the poor layout and design of the initial tramlines has also resulted in a significant number of pedestrian injuries.

Please provide your views on each of the National Planning Policies in the text boxes provided below.

Policy 2: Climate emergency

Part c) of this policy provides significant wiggle room for unsustainable developments. What are the criteria for "proposed development... in the long-term public interest"? This statement is nebulous at best, and without clear parameters as to what "long-term public interest" is, it could be used to push through development that actively works against net zero ambitions. As we are in a declared climate emergency, unsustainable developments that add net carbon emissions should not be progressed.

Also on part c), re the following statement "Where significant emissions are likely (even as minimised) in relation to national decarbonisation pathways but the planning authority is minded to grant consent, emissions off-setting measures may be considered including nature-based solutions". While we argue that any unsustainable developments should be refused, off-setting measures should be a requirement rather than merely a consideration.

Policy 6: Design, quality and place

It would be pertinent to include transport policies which dovetail into planning, such as the newly revamped Cycling By Design, in this section.

RE Designed for lifelong health and wellbeing - we would like to see inclusion of neighbourhoods being easily permeable for cycles, as well as being walkable.

RE Well connected and easy to move around - there is no mention of cycling here, which is an oversight. The phrase "designing places for everyone for walking and wheeling" excludes cycles as a sustainable transport option and the sentence should be amended to include cycling.

Policy 10: Sustainable transport

In general this section contains too many ambiguities and let-outs which will enable unsustainable development to proceed. We list below some of the most obvious examples.

Part f) has no reference to carbon emissions from the building of trunk road junctions. Carbon emissions from the build and, even more significantly, the resulting likely rise in private car trips should be included as considerations for refusal.

Part g) states "Development proposals should put people and place before unsustainable travel where appropriate". If the government is serious about its climate ambitions, and its 20% car-km reduction commitment, this should always be the case, not just when considered appropriate. There is opportunity for unsustainable developments that are car-dominated to progress based on this statement in its current form.

Part g) states "Effective design can reduce the number and speed of vehicles and provide safe crossings on local roads". In our view, effective design **MUST** reduce the number and speed of vehicles - this should not be an option.

Part h) of this policy is unclear in its current form, as it can be interpreted in several different ways. For example, it could be interpreted that if a development would increase reliance on the private car, then it can be approved as long as there are cycle routes, walking infrastructure and access to public transport. This policy statement should be amended so that it is very clear that any developments that increase reliance on the private car should be refused, regardless of associated sustainable transport infrastructure.

We have known for a very long time that by making driving convenient and accessible to people, it is the mode of transport that most will choose, regardless of quality and access to public transport or walking/cycling infrastructure. The Scottish Government has committed to reduce vehicle trips by 20% by 2030 - they will absolutely not be met if private vehicles continue to be the easiest and most convenient transport choice, even when sustainable alternatives exist.

Scottish planning policy should be absolutely clear that any developments that increase reliance on the private car should be refused outright.

Do you have anything else to add in relation to the draft of the National Planning Framework (NPF4)?

Spokes broadly welcomes the themes contained within NPF4. It is clear that the policies contained within aim to tackle the climate emergency and ensure that development across Scotland is more sustainable.

Our specific interest in NPF4 lies within transport and accessibility for cycling. We broadly welcome the contents of the document in this respect, as the importance of active travel has been weaved into planning policy. We are pleased to see the embedding of 20 minute neighbourhood concepts across NPF4, the inclusion of the National Walking and Cycling Network as part of the national spatial strategy, as well as reference to the sustainable transport hierarchy and relevant supporting transport policy.

Planning and transport are intrinsically linked and need to support each other in both policy and implementation. We have seen far too many recent developments in the Lothians which are completely car-dependent and have little in the way of amenities and infrastructure to ensure that people can live their lives locally and get around in a more sustainable way. We have also seen many planning applications granted at local authority level which encourage private vehicle trips, such as drive-through retail and food outlets.

NPF4 certainly makes some inroads to tackle these kinds of unsustainable developments. We are particularly pleased to see the climate emergency and carbon emissions/net zero referenced throughout the document, as well as being a key policy consideration (policy 2).

However, saying this, we also feel that some of the policy statements lack clarity and offer wiggle room for unsustainable developments to progress. We are particularly concerned about the lack of robust policy to help reduce reliance on private vehicles (policy 10(h) in particular). We have noted specific examples throughout this consultation response, but many policy statements provide get out clauses and opportunities to build developments with the car as a central focus or where carbon emissions are considered "in the public interest".

We know that this is not an approach that will help to tackle the climate crisis or effect modal shift to more sustainable modes of transport such as active travel and public transport. There is plenty evidence to show that when private vehicles are convenient and easy to use, even with sustainable alternatives, people choose to drive.

The Scottish Government has committed to a 20% reduction in vehicle miles by 2030. This commitment will not be met if developments continue to be built that make driving easy and convenient, even with sustainable transport options also built in and available.

We are surprised that the policies around sustainable transport are not more robust and work towards this Scottish Government commitment. Ministers and policy-writing civil servants well know that behaviour change will not happen with just carrots - sticks are also required, as Chris Stark, head of the UK Climate Change Committee, pointed out in verbal evidence to a Scottish Parliament Committee. We would certainly like to see NPF4 acting as a stick (as well as carrot for the sustainable) and providing policy that actively works to refuse car-dominated developments full stop.

Spokes is also surprised at the lack of mention of this 20% reduction commitment throughout NPF4. We believe it is only referenced once or twice throughout. We feel this commitment should be more clearly woven into NPF4, as this document is one of the most important pieces of policy to help ensure that Scotland stops building in car-domination into its rural and urban spaces.

We also feel guidance on developer contributions is quite light. We find that many local developments provide acceptable cycling infrastructure within the site, but connections outwith the permitted plot are often very poor. NPF4 does not seem to tackle this via policy considerations - we would have expected more robust guidance on developer contributions to ensure that surrounding active travel and public transport networks are of good quality and, if not, then upgraded to meet Cycling By Design standards.

As an extension to the above point, reference to active travel network connectivity is generally light throughout this document. We appreciate that the purpose of this document is not to get into the weeds with the minutiae of planning implementation, but we are surprised that the National Walking and Cycling Network has only one named project included as part of NPF4, whereas multiple road and public transport upgrades are named and noted.

We are also surprised to see no reference to the recently updated Cycling By Design guidance included in NPF4. This document is important, as it provides accessible design guidance for cycling infrastructure and should be the de-facto policy for cycle provision when planning developments. It may be pertinent to include this in policy 6.

In conclusion, we feel that NPF4 is going in the right direction with respect to sustainable development, but that it could be stronger and more robust in order to support a range of other Scottish Government policies, targets and objectives. We note that we are in the midst of a climate emergency and Scotland's policy frameworks need to be ambitious and brave if we wish to seriously curb carbon emissions, enable modal shift to more sustainable forms of transport like cycling for short trips, and ensure that we deliver a fairer and more equitable place for everyone.