

Net Zero, Energy and Transport Committee 5th Meeting, 2022 (session 6), Tuesday, 08 February 2022

Evidence session on the Fourth National Planning Framework (NPF4)

Note by the clerk

Introduction

1. The National Planning Framework is a long-term plan for Scotland that sets out the Scottish Government's view where development and infrastructure is needed. The NPF is currently in its [third iteration](#), dating from 2014.
2. Published on 10 November 2021, during COP26 in Glasgow, the [Draft Fourth National Planning Framework](#) (NPF4) provides a statutory strategy and framework for land use out to Scotland's net zero target year of 2045. The draft recognises that significant progress must be made to reach net zero, as well as the interim target of a 75% emissions reduction by the end of this decade.

Parliamentary scrutiny of draft NPF4

3. The Scottish Parliament has a statutory right to be consulted on a draft of framework and has 120 days to respond. The Local Government, Housing and Planning (LGHP) Committee of the Scottish Parliament is [leading on scrutiny of draft NPF4](#). The LGHP Committee carried out a call for written views on NPF4 and all responses can be found [via this link](#).
4. Given NPF4's scope and importance, other Parliamentary committees are sharing in this scrutiny. These include the Net Zero, Energy and Transport (NZET) Committee which has agreed to focus on themes in NPF4 most relevant to its own remit: net zero emissions, land use and the natural environment, transport, infrastructure, waste and recycling, and energy.

Evidence session on 8 February: NPF4 and transport, the natural environment and the circular economy

5. The NZET Committee is taking evidence over two days: on 1 and 8 February. On 1 February, the Committee considered how NPF4 addressed future energy policy.
6. On 8 February, the Committee will take evidence from two panels of experts and stakeholders. The Committee will first take evidence on NPF4 and transport from—

- [Transform Scotland](#),
 - [Sustrans Scotland](#),
 - [the Confederation of Passenger Transport Scotland](#), and
 - [Mobility and Access Committee for Scotland](#)
7. It will then take evidence on NPF4 and the natural environment, waste management and the circular economy from—
- [Adaptation Scotland](#),
 - [SE Link](#), and
 - [Zero Waste Scotland](#)
8. The following have responded to the Scottish Parliament’s call for views:
- [Scottish Environment Link](#);
 - [Sustrans Scotland](#);
9. The Mobility and Access Committee for Scotland have provided a written submission in advance of their representative’s appearance at the meeting, which is annexed to this paper.
10. The Scottish Parliament Information Centre (SPICe) has been producing a [series of blogs](#) on NPF4. The blog on [NPF4: Mainstreaming Climate Change?](#) considers the National Spatial Strategy which sets out overarching principles and a vision for sustainable, liveable, productive and distinctive places, and the 18 National Developments supporting delivery.

Next steps

11. After the evidence session, the Committee will discuss key themes to emerge from the discussion. The Committee will then write to the LGHP Committee with its concluded views on draft NPF4 by the end of this month.
12. The LGHP Committee is expected to report on the draft in March, with a Parliamentary debate taking place shortly afterwards, near the end of the 120-day period. The Scottish Government is expected to reflect on the report and the debate, and to produce a final NPF4 this summer.

Annexe

Draft Fourth National Planning Framework: Submission from the Mobility and Access Committee for Scotland (MACS)

The Mobility and Access Committee for Scotland (MACS) has welcomed the opportunity to comment on the draft NPF4 document and to speak to the Net Zero, Energy and Transport Committee. This paper sets out the comments, in relation to our statutory remit concerning the mobility and access needs of disabled people.

The principal points we would like to present to the Committee are:

- the need to emphasise 'reducing inequalities' and so align NPF4 objectives more directly with those of the National Transport Strategy (NTS2);
- a need to give more emphasis on Human Rights and equalities, and especially conforming effectively with the Public Sector Equality Duty;
- a suggested addition of "transport interchanges" (mostly bus and train stations) to the list of 'National Developments'; and
- a greater and explicit emphasis on everyday pedestrian environments (compared to 'prestige' active travel infrastructure such as 'active travel freeways').

Overall, we would like to see a stronger emphasis in the final Framework on reducing inequalities - one of the key strategic themes of the recently-adopted National Transport Strategy (NTS2).

The opening paragraph of Part 1 of the draft NPF4 focuses on "the need to embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, build a wellbeing economy and create great places". The omission of the need to reduce inequalities and promote equality and inclusion for all in the opening, framing section of the consultation calls into question the intent to deliver a country focused on accessibility, inclusion and equal opportunities for all its citizens (essential to building a "just transition" and delivering a wellbeing economy and creating greater places).

We make the following comments in response to the consultation questions we see as most relevant to MACS' remit.

Q2. Liveable places. Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Planning policy, and its synergy with transport policy, can be an important tool to address the current inequalities which many disabled people face in their everyday

personal mobility. The “opportunity ...to address longstanding inequality and eliminate discrimination” will only be seized if the scale of the challenge it represents is grasped. As we note below, this will require significant change to current processes, policies and cultures for example in moving beyond ‘tick box’ approaches to reducing inequalities and to implementing Public Sector Equality Duties.

Q6. Spatial principles. Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

We support these principles and would emphasise that developing more accessible mobility options for disabled people will be an important part of achieving a ‘just transition’ and the local living objective.

Qs19-21. (National Developments)

We have the following comments regarding the proposed National Developments

We welcome the statement that, in taking forward the National Developments, it is expected that delivery partners will: “ensure that associated transport interventions to facilitate access to or from the locations are in line with sustainable transport and sustainable investment hierarchies. Strategic transport interventions for Government will be identified in STPR2 and the Islands Connectivity Plan, and some recommendations may require working with partners for delivery.” MACS suggests this needs to be aligned to the “working with partners” focus of NTS2 and again cites the need for these activities to focus on the pedestrian environment to support the sustainable transport hierarchy with walking and wheeling in the top tier.

2: National Walking, Cycling and Wheeling Network

We are unclear if this refers to what is normally known as the National Cycle Network (NCN) sponsored by Sustrans. We are also unclear what is meant by the statement that this will “support the delivery of our spatial strategy by creating a more sustainable distribution of access across Scotland”. Assuming it refers to the NCN, its upgrading must include removing the barriers (often physical) to disabled people using adapted bikes, tricycles and mobility equipment etc. It must also make it easier to access the NCN in terms of the pedestrian environment and linking networks and safe routes (dropped kerbs, hard top surface, width of pathways, signage, etcetera)

This would also build on the initial work of Transport Scotland’s Sustainable and Active Travel Team and the findings of the survey on Adaptive Bike Share (published Dec 2021) to promote the need for shared bike schemes to routinely offer non-standard bikes as mobility aids to assist people with limited mobility to transition to active travel where possible. The availability of non standard bike and e-bike hire schemes is central to stopping disabled people being excluded from the National Cycle Network and will help reduce inequalities (as well as making infrastructure more accessible.

More generally however, we would like to see more emphasis on the routine, local pedestrian and cycling environments rather than to focus disproportionately on the NCN. These environments - especially local pavements - are much the most important 'active travel infrastructure' for most disabled people, but are frequently hostile, or simply inaccessible. Improving Scotland's pedestrian environment is a massive task, but an essential one, and aligned to the priorities identified in the STPR2. National Planning Frameworks need to encourage investment to improve walking and wheeling spaces in town centres and residential areas alike.

3: UrbanMass/Rapid Transit Networks

We support investment in these networks, which have major potential to raise the bar in terms of public transport accessibility, amongst other benefits. Improving transport equity will require them to be available (required routes and timetabling), affordable as well as accessible. We note for example that the use of NEC cards on the Edinburgh tram - perhaps the most accessible public transport service in Scotland - is currently restricted to Edinburgh residents alone; while non-Edinburgh residents can use NEC cards on Edinburgh bus services. We would also point to the Glasgow subway system which many disabled people and people with poor mobility are excluded from, as most of the stations are not accessible.

6: Digital Fibre Network

We note that investment in this area has significant potential benefits to disabled people, for example facilitating home working and permitting remote access to a range of services, which can avoid the need to travel.

Additional suggested National Development

We suggest adding to the list of proposed National Developments 'major public transport interchanges'. By this we mean principally bus and train stations which have a key role in facilitating access to public transport, making it more accessible and attractive not only to disabled people but to the general public too. This will help achieve the target to reduce car travel by 20% by 2030, and address multiple access failures in rail and bus stations. This will also support the STPR2 priorities.

Q22. Sustainable Places. We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

No. This is too prescriptive. There may be plans and decisions, which are fully justified on other grounds (such as reducing inequalities), so although tackling climate change is an important objective, it should not necessarily be the primary consideration in every case.

Overall, the Framework does not give sufficient priority to the need to reduce inequalities. This is demonstrated for example by the introductory statement on page 3 (see our opening statement), which cites climate change, biodiversity, health and wellbeing etc, but does not mention the need to reduce inequalities.

This is in contrast to the NTS2, in which “Reducing Inequalities” is the first of four strategic pillars.

Q24. Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Under paragraph c) Policy 2, we suggest adding “or there are other over-riding reasons (for example in reducing inequality) why it should proceed”

Q26. Policy 4: Human rights and equality. Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

This section is too weak. The built environment, the distribution of facilities and services etc have a significant and often adverse effect on disabled people, their mobility and access. We would like to see more emphasis on the legislative requirements spelt out in this section, including the Equality Act 2010, the Human Rights Acts, the Fairer Scotland Duty, etc. An explicit mention should be made about the role of Equality Impact Assessments under the Public Sector Equality Duties, in line with the 2010 Equality Act.

Q28. Policy 6: Design, quality and place. Do you agree that this policy will enable the planning system to promote design, quality and place?

We support the signposting to the ‘Six Qualities of Successful Places’, especially the third quality (‘Well-connected and easy to move around’) and cite the direct links from these six qualities to reducing social isolation and loneliness and improving health and well-being (one of the 4 pillars of NTS2)

We would like to see ‘Inclusive Mobility’ (updated UK-wide design guidance issued in January 2022) added to the guidance listed in paragraph b) under Policy 6. It is important to emphasise the need for developments to conform to accessibility best practice.

We suggest adding a reference to the importance of simple, basic facilities such as seats and toilets (preferably accessible and ideally Changing Place toilets), which make places more accessible - especially for disabled people but also other people with protected characteristics including children, older people, pregnant women, etc.

Q29. Policy 7: Local living. Do you agree that this policy sufficiently addresses the need to support local living

We welcome the emphasis on the 20 minute neighbourhood principle, which MACS has been active in advocating, for example in [a series of events with the Health and Social Care Alliance and Disability Equality Scotland](#).

We believe that designing services and facilities to be close to people’s home has considerable potential to make communities more inclusive and accessible for

disabled people - and everyone else - as well as contributing to environmental objectives.

This would strengthen the underpin of the amended Town and Country Planning (Scotland) Act 1997, which directs that the National Planning Framework must contribute to a series of six outcomes, in this case: improving the health and wellbeing of our people; improving equality and eliminating discrimination. This will also assist with other Transport Scotland commitments from the Programme for Government including the connected communities agenda and reducing social isolation and loneliness.

We also welcome the clarification that 20 minute neighbourhoods should facilitate access to services within approximately 800 metres of people's homes. The concept has also been subject to some varying interpretations - a '20 minute cycle ride' for example, implies a much wider geographic area than one within 800 metres.

Q30. Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

We would again like to see explicit mention of the need to improve everyday pedestrian environments; often the infrastructure, which presents barriers to disabled people to get around their neighbourhood and also to access public transport to travel further afield. Too often 'infrastructure' is conceived as major developments, but planning policy should more vigorously address the need to improve pavements, pedestrian crossings etc.

Q32. Policy 10: Sustainable transport. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

"Reducing inequalities" should be added to the objectives in first paragraph in this section, to make it consistent with the NTS2.

We would like to see the "relevant equalities legislation" referred to in paragraph k) spelt out much more explicitly and in more detail. Too often lip service only is paid to these requirements and the NPF4 is an opportunity to reinforce these legal obligations, In particular the reference should be made to the need, under the Public Sector Equality Duties, to carry out and publish Equality Impact Assessments, other required impact assessments and to involve people with protected characteristics in these assessments, as required by law.

Q44. Policy 23: Digital infrastructure. Do you agree that this policy ensures all of our places will be digitally connected?

Mention should be made of the need to avoid siting digital infrastructure on footways where they obstruct pedestrians: this is a rapidly growing 'pavement clutter' problem which needs to be reversed. For example, a clause such as: "Digital infrastructure (for example, telecoms cabinets, masts, etc) should not

impede pedestrians or reduce 'clear walking zones' unnecessarily, by ensuring such infrastructure is sited appropriately.”

Q55: Do you have any other comments on the delivery of the spatial strategy?

We do not believe that the planning system is currently as effective as it should be in achieving social goals, including better accessibility and mobility. This may be for a variety of reasons, including limited staff resources, a low appetite to challenge developers, insufficient professional training in promoting equality, tensions between local, regional and national decision-making, lack of meaningful engagement with local communities and end users etc. These need to be addressed so that the sound objectives of the planning system are seen in practice as well as in theory.

A specific change we would like to see is for developers to contribute more financially to improving public spaces, for example through a clause such as: “Developers should contribute appropriately to financing improvements in nearby public spaces either through voluntary arrangements, or more vigorous use of ‘Section 75’ agreements. “

David Hunter
MACS
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