

# Draft Fourth National Planning Framework – NPF4

## CONSULTATION QUESTIONS

This is a list of consultation questions as they appear in the consultation draft NPF4 and accompanying impact assessments.

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### Part 1 – A national Spatial Strategy for Scotland 2045

#### Sustainable places

Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment.

Q 1: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE NET ZERO PLACES WHICH WILL BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE AND SUPPORT RECOVERY OF OUR NATURAL ENVIRONMENT?

Yes.

As a 'vision' statement this makes an important connection with Scotland's response to the climate emergency and the UN Intergovernmental Panel's call for action. It outlines the main strategic policy themes and includes sustainable travel.

We would suggest in the final wording that the reference to sustainable travel 'reduce the need to travel unsustainably' be changed to a more positive 'increase the use of sustainable transport' in line with the positive language used for the other themes of energy efficiency, biodiversity etc. We think the NPF has a role in positively encouraging the development of active travel infrastructure as well as directing development away from a reliance on car use. The draft text rightly highlights these restrictions but we would suggest using a positive narrative to guide development planning and management.

## Liveable places

Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live.

### Q 2: 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?

Yes.

Sustrans Scotland welcomes the long-term vision to create better places focused on creating the conditions for lifelong health and wellbeing for all. We support a place-based approach and welcome an emphasis on collaboration and cross-sectoral work across planning, transport, housing, regeneration and environmental policies.

We further welcome the application of the '20 minute neighbourhood' concept as a way to approach and explore how to develop sustainable communities.

Given the importance the concept places on sustainable transport and connectivity we would suggest reflecting this in the descriptive text along with housing, services, open space and culture. As the draft NPF goes on to make substantial statements on connectivity and sustainable transport it would make sense to include these within the strategic vision.

## Productive places

Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing.

**Q 3: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES WHICH WILL ATTRACT NEW INVESTMENT, BUILD BUSINESS CONFIDENCE, STIMULATE ENTREPRENEURSHIP AND FACILITATE FUTURE WAYS OF WORKING – IMPROVING ECONOMIC, SOCIAL AND ENVIRONMENTAL WELLBEING?**

Yes.

However the focus of the strategic vision appears to be on global trade and it should also reflect the needs of smaller businesses and those that service local communities.

Relating back to the concept of 20 minute neighbourhoods, development should support local business and retail by improving access to land and buildings not served well by sustainable transport. Distribution networks also need to be supported to become more sustainable, for example we are seeing increasing use of cargo bikes where good cycling infrastructure exists.

## Distinctive places

Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.

**Q 4: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES WHICH WILL BE DISTINCTIVE, SAFE AND PLEASANT, EASY TO MOVE AROUND, WELCOMING, NATURE-POSITIVE AND RESOURCE EFFICIENT?**

Yes.

We welcome the vision that places should be distinctive and ‘easy to move around’. Green space and blue-green infrastructure promote liveability and enhance biodiversity.

The vision promotes a strong commitment to place making and quality. It quite rightly talks about conservation but could also address the need for new design and architecture to contribute to ‘distinctive places’.

**Q 5: DO YOU AGREE THAT THE SPATIAL STRATEGY WILL DELIVER FUTURE PLACES THAT OVERALL ARE SUSTAINABLE, LIVEABLE, PRODUCTIVE AND DISTINCTIVE?**

Yes.

Strong spatial statements are needed to shape development and approaching this at a regional level allows it to be balanced and prioritised in light of local needs.

It is present in the diagram (page 11) but should also be noted that the spatial boundaries are not necessarily aligned with administrative boundaries.

## Spatial principles

**Q 6: DO YOU AGREE THAT THESE SPATIAL PRINCIPLES WILL ENABLE THE RIGHT CHOICES TO BE MADE ABOUT WHERE DEVELOPMENT SHOULD BE LOCATED?**

Yes.

In particular we support the principles for developing local living and the development of the vision for 20 minute neighbourhoods. We agree that connectivity and active travel links are important infrastructure that will support sustainable forms of development.

## Spatial Strategy Action Areas

**Q 7: DO YOU AGREE THAT THESE SPATIAL STRATEGY ACTION AREAS PROVIDE A STRONG BASIS TO TAKE FORWARD REGIONAL PRIORITY ACTIONS?**

Yes.

As the custodians of the National Cycle Network we are identifying the routes needed to connect across Scotland. The proposed regional action areas can help to facilitate engagement with partners on route development by clarifying the strategic level ambitions for development across each region.

## National Spatial Strategy

### Q 18: WHAT ARE YOUR OVERALL VIEWS ON THIS PROPOSED NATIONAL SPATIAL STRATEGY?

We welcome the work that has been done on the spatial strategy and the recognition across all five action areas of the need to develop active travel infrastructure. This should clearly make the case and set the context for the development of sustainable transport in support of national outcomes.

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## Part 2 - National developments

### Q 19: DO YOU THINK THAT ANY OF THE CLASSES OF DEVELOPMENT DESCRIBED IN THE STATEMENTS OF NEED SHOULD BE CHANGED OR ADDITIONAL CLASSES ADDED IN ORDER TO DELIVER THE NATIONAL DEVELOPMENT DESCRIBED?

Sustrans strongly welcomes the proposal for National Development 2, the 'National Walking, Cycling and Wheeling Network'.

Active travel and sustainable transport are promoted throughout the Framework and this designation will draw attention and development to the transformative change

required in creating a Scotland wide active travel network.

We agree with its main purpose in supporting the transition to net zero and the benefits for health and wellbeing gained from promoting active lifestyles.

Importantly the definition covers a range of active travel infrastructure including newly developed routes and the upgrading of existing routes. It covers short and long distance routes and emphasises the importance of connections between settlements, amenities, services, employment and transport hubs.

To support the delivery of such a network we would recommend making some additions to the designation.

Reducing inequality is a key objective of the National Transport Strategy and it is very welcome that the designation for an active travel network uses 'Walking, cycling and wheeling' as an inclusive term that incorporates the needs of people irrespective of age or disability.

To achieve this and to set a standard for inclusion going forward we recommend that any development proposal should be fully accessible to qualify as part of a national network. In practical terms this could be supported by clarifying the use of 'Designing Streets' and 'Cycling by Design', produced by Scottish Government, as guidance as well as requiring

application consultation to obtain the views of disabled people and other groups who may be excluded or face barriers to choosing active journeys.

In their assessment of the health and wellbeing benefits of the draft NPF4 published by Public Health Scotland (23 Nov 2021), the health benefits of active travel are clearly supported and this is reflected in the description of need for the designation.

PHS raise an important issue that the benefits of the active travel network will only be realised if it is well maintained and made usable for everyone. This is a view that Sustrans also wishes to promote into the Framework.

At present many parts of existing infrastructure suffer from poor design and maintenance. Sustrans thinks it is necessary for any national transport

network to be safe, reliable and well maintained preferably with ring-fenced and long-term public funding and for any new or upgraded infrastructure to be properly maintained as an asset.

In the absence of public funding could be achieved through requiring conditions or appropriate legal agreements covering maintenance arrangements to be included with any consents that are in the designation. We note that management and maintenance plans form part of Policy 12 (Blue and green infrastructure, play and sport) and believe similar provisions would be useful for active travel infrastructure.

We have also noticed that the name proposed for the national development, 'National Walking, Cycling and Wheeling Network', has been confused with the National Cycle Network by some. Whereas we are clear that the NCN is an example of what could be designated as part of a 'NWCWN' along with other active travel infrastructure, clearly distinguishing the two with separate names may be required to avoid confusion.

In support of the concept of a Scotland wide active travel network we have referred to it as just that, a 'Strategic Active Travel Network'.

In addition to supporting the proposal for a National Walking, Cycling and Wheeling Network we commend the proposals for active travel incorporated into other national developments such as the Clyde Mission, Dundee Waterfront, Central Scotland Green Network and the Edinburgh Waterfront.

This should ensure that active travel is embedded in significant new residential and commercial development.

The definition of the NWCWN could also be extended to cover supporting infrastructure such as cycle parking or storage that would directly contribute to supporting the use of the network.

**Q 20: IS THE LEVEL OF INFORMATION IN THE STATEMENTS OF NEED ENOUGH FOR COMMUNITIES, APPLICANTS AND PLANNING AUTHORITIES TO CLEARLY DECIDE WHEN A PROPOSAL SHOULD BE HANDLED AS A NATIONAL DEVELOPMENT?**

Yes.

The proposal for the NWCWN clearly links the development of infrastructure with a range of outcomes including emissions reduction and improving health and wellbeing.

It covers both new and upgraded routes of various types and if it included our recommendations on accessibility and maintenance would we believe be comprehensive and reflective of the quality of development that should be expected.

**Q 21: DO YOU THINK THERE ARE OTHER DEVELOPMENTS, NOT ALREADY CONSIDERED IN SUPPORTING DOCUMENTS, THAT SHOULD BE CONSIDERED FOR NATIONAL DEVELOPMENT STATUS?**

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## **Part 3 - National Planning Policy**

### **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.



**Q 22: DO YOU AGREE THAT ADDRESSING CLIMATE CHANGE AND NATURE RECOVERY SHOULD BE THE PRIMARY GUIDING PRINCIPLES FOR ALL OUR PLANS AND PLANNING DECISIONS?**

We are comfortable with the proposal that climate change and nature recovery should form the guiding principle for development planning but the statement is not clear if it is referring to the NPF, Local Development Plans or all plans produced from government.

We agree that application of the Place Principle is an important step in moving the planning system from conflict to consensus and to improving the quality of development.

## **Policy 1: Plan-led approach to sustainable development**

**Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?**

We agree that all Local Development Plans should manage land use and development in the long term public interest. The connection to the Community Empowerment (Scotland) Act 2015 broadens the purpose of development plans to include other objectives such as addressing socio-economic disadvantage and aligns the planning system with other strategic statements of policy.

## **Policy 2: Climate emergency**

**Q 24: DO YOU AGREE THAT THIS POLICY WILL ENSURE THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE CLIMATE EMERGENCY?**

Sustrans supports the proposed policy to give the Global Climate emergency significant weighting in decision making and the requirement for development to actively reduce emissions.

It is likely that many developments will be required to provide active travel infrastructure and connections both on and off-site to achieve this and we would hope that this will generate further development of active travel networks.

## **Policy 3: Nature crisis**

**Q 25: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE NATURE CRISIS?**

## Policy 4: Human rights and equality

**Q 26: 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?**

Yes.

This is an important policy that addresses social inclusion in the process of development and we strongly agree that participation and the promotion of equality should be a matter given consideration when determining development applications. There is a need to involve all communities of interest in design of places – children and young people, older people, women, disabled people and ethnic minorities.

## Policy 5: Community wealth building

**Q 27: DO YOU AGREE THAT PLANNING POLICY SHOULD SUPPORT COMMUNITY WEALTH BUILDING, AND DOES THIS POLICY DELIVER THIS?**

We have concerns that 'community wealth building' is not a well understood term. It is not clear what would be expected from a development proposal that would demonstrate contribution to its aims.

## Policy 6: Design, quality and place

**Q 28: DO YOU AGREE THAT THIS POLICY WILL ENABLE THE PLANNING SYSTEM TO PROMOTE DESIGN, QUALITY AND PLACE ?**

Yes.

We welcome the commitment to good design principles and to inclusive design. The principles clearly refer to connectivity and active travel and it is clear that poor design should not be supported.

The list of appropriate design guidance in section (b) should include reference to Cycling By Design to assist with active travel development.

## Policy 7: Local living

### Q 29: DO YOU AGREE THAT THIS POLICY SUFFICIENTLY ADDRESSES THE NEED TO SUPPORT LOCAL LIVING?

Sustrans welcomes the clarity provided that developments consistent with the principle of 20 minute neighbourhoods should be supported and that consideration is given to sustainable transport connections.

We recognise that the principle will be applied through Local Development Plans and reflect local needs and priorities. Policy 7b clarifies the matters that will be considered and includes walking, wheeling and cycling networks as well as interconnectivity between neighbourhoods. We agree that this approach should be applied to all neighbourhoods while allowing for appropriate local development, informed by place making, to emerge.

## Policy 8: Infrastructure First

### Q 30: DO YOU AGREE THAT THIS POLICY ENSURES THAT WE MAKE BEST USE OF EXISTING INFRASTRUCTURE AND TAKE AN INFRASTRUCTURE-FIRST APPROACH TO PLANNING?

Sustrans welcomes the Infrastructure First policy. To implement it successfully for active travel infrastructure, local authorities will need to develop plans for their local active travel networks. The consequences of not doing this will be the development of ad hoc pieces of infrastructure that fail to connect and to provide the coherency needed to be useful.

The policy supports this by requiring the Local Development Plan to set out infrastructure requirements and we take this to include active travel route development. We would hope that the forthcoming guidance will reflect this by promoting it as necessary infrastructure.

## Policy 9: Quality homes

### Q 31: DO YOU AGREE THAT THIS POLICY MEETS THE AIMS OF SUPPORTING THE DELIVERY OF HIGH QUALITY, SUSTAINABLE HOMES THAT MEET THE NEEDS OF PEOPLE THROUGHOUT THEIR LIVES?

Yes.

The selection of land released for housing should prioritise accessibility to sustainable and shared transport and active travel routes while designed in a way that reduces travel demand by car.

From experience of working across local authorities we note that quality checks as part of the design approval process in development applications are often not applied. We welcome reference to the 'six qualities of successful places' in Policy 6d and in addition to clear statements from the local authority on active travel requirements and local design policy should assist with improving outcomes for high quality, sustainable homes.

## Policy 10: Sustainable transport

### Q 32: DO YOU AGREE THAT THIS POLICY WILL REDUCE THE NEED TO TRAVEL UNSUSTAINABLY, DECARBONISE OUR TRANSPORT SYSTEM AND PROMOTE ACTIVE TRAVEL CHOICES?

Sustrans supports the direction provided to Local Development Plans to actively reduce unsustainable travel. Sustrans also supports the importance of transport assessments and locally produced active travel plans.

The policy applies important restrictions on development where it is not sustainably located and requires appropriate mitigation to address significant impacts of car based travel.

Further clarity may be required on the interpretation of 'significant' impact with the balance of interpretation placed clearly in favour of sustainability.

Requiring developers to detail how they are applying the sustainable travel and investment hierarchies will help inform the context for decision making.

We also support provisions for safe and convenient cycle parking. Consideration should be given to extending the range of household types covered by the residential requirement.

We would recommend the policy promote amenities that support active travel infrastructure including charging stations, repair facilities and other supports. It could be anticipated that increases in cycling will require more extensive parking and storage, for example in city centres and this could usefully be supported by the policy.

As a final point we would recommend a policy be included that protects existing active travel routes from the consequences of other development. The National Cycle Network is regularly impacted by a range of planning applications that can affect route alignment or accessibility. Sustrans engages positively with developers and planning departments but active travel infrastructure such as the NCN is not protected in the same way as roads or rail.

We would ask for a policy that can safeguard active travel routes – including those classified as the proposed National Walking, Cycling and Wheeling Network – protecting them from removal and encouraging developers to mitigate any negative impact by at least maintaining current level of utility of a route or improving on it. We note similar policies are being used to protect open space and play areas and would recommend the same level of protection.

## Policy 12: Blue and green infrastructure, play and sport

**Q 34: DO YOU AGREE THAT THIS POLICY WILL HELP TO MAKE OUR PLACES GREENER, HEALTHIER, AND MORE RESILIENT TO CLIMATE CHANGE BY SUPPORTING AND ENHANCING BLUE AND GREEN INFRASTRUCTURE AND PROVIDING GOOD QUALITY LOCAL OPPORTUNITIES FOR PLAY AND SPORT?**

Yes.

There is a close relationship between active travel and green / blue infrastructure and connecting to areas of play and recreation. Connecting communities with access to natural open space is an important outcome for active travel networks in line with improving health and wellbeing.

We welcome the emphasis being placed on children's play which should be accessed by safe walking, wheeling and cycling routes.

## Policy 17: Sustainable tourism

**Q 38: DO YOU AGREE THAT THIS POLICY WILL HELP TO INSPIRE PEOPLE TO VISIT SCOTLAND, AND SUPPORT SUSTAINABLE TOURISM WHICH BENEFITS LOCAL PEOPLE AND IS CONSISTENT WITH OUR NET-ZERO AND NATURE COMMITMENTS?**

We recommend extending Policy 17g to provide stronger guidance on traffic generation for tourist facilities. Our concern is it will lead to a different weighting for traffic generation from tourist facilities from that applied in Policy 10d.

Sustainable transport should be a goal for tourist development whether in cities or rural / remote areas and it should be clear that restrictions on traffic generation from development apply to tourist facilities as well.

## Policies 24 to 27: Distinctive places

**Q 45: DO YOU AGREE THAT THESE POLICIES WILL ENSURE SCOTLAND'S PLACES WILL SUPPORT LOW CARBON URBAN LIVING?**

Yes.

Policy 24 places important emphasis of connecting city, town and local centres by walking, wheeling and cycling. This will support Local Development Plans to consider forming active travel networks and ensuring that infrastructure joins together and connects with other transport modes.

We welcome Policy 26c applying the principle of 20 minute neighbourhoods it applies to a town centre and includes support for active travel.

## Policy 28: Historic assets and places

**Q 46: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND ENHANCE OUR HISTORIC ENVIRONMENT, AND SUPPORT THE RE-USE OF REDUNDANT OR NEGLECTED HISTORIC BUILDINGS?**

## Policy 29: Urban edges and the green belt

**Q 47: DO YOU AGREE THAT THIS POLICY WILL INCREASE THE DENSITY OF OUR SETTLEMENTS, RESTORE NATURE AND PROMOTE LOCAL LIVING BY LIMITING URBAN EXPANSION AND USING THE LAND AROUND OUR TOWNS AND CITIES WISELY?**

Yes.

We assume that the definition of 'essential infrastructure' or 'development meeting a national requirement' will apply to active travel routes connecting through designated green belt areas and subject to an assessment statement. The stipulations on such development covering location, landscape character, appearance, materials and environmental impact would be reflected in design guidance and should be taken account of.

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## Part 4 - Delivery

Delivering our spatial strategy

### Q 54: DO YOU AGREE WITH OUR PROPOSED PRIORITIES FOR THE DELIVERY OF THE SPATIAL STRATEGY?

Yes.

The ambition to align resources will have an impact on the development of active travel networks as it provides the means to secure wider funding from private and public sources. Achieving this will require more work to be done on both local active travel strategies and route development for walking, cycling and wheeling.

We believe that investment in active travel should be supported and guided by the Infrastructure First approach and again this will rely substantially on local route development.

The proposed National Development 2 (Walking, Cycling and Wheeling Network), along with the spatial strategy and policies, is an important step in drawing the planning system and the forthcoming investment in active travel together.

### Q 55: DO YOU HAVE ANY OTHER COMMENTS ON THE DELIVERY OF THE SPATIAL STRATEGY?

The creation and delivery of a National Walking, Cycling and Wheeling Network will require co-ordinated action between Transport Scotland, local authorities, the third sector, developers and communities.

Interaction is currently taking place at national, regional and local levels in line with the Scottish Government's Active Travel Framework ambition for 2030 to make walking, cycling and wheeling the most popular mode of travel for 'everyday' journeys.

The Draft NPF4 supports this by preparing the planning system but the ambition for the national development will still require substantial funding, strategic planning and delivery.

Local Development Plans will have a key role facilitating the implementation and management of active travel networks across urban, rural and island settings. We believe that delivering the outcomes of NPF4 will depend heavily on that local level of development planning promoting the importance of achieving networked infrastructure and avoiding piecemeal development.

Connected to delivery is the issue of resourcing and skilling planners to deliver the aspiration of quality design and place making.