

DRAFT NATIONAL PLANNING FRAMEWORK 4

Response from Transform Scotland

31 March 2022

1. Introduction.

Transform Scotland broadly welcomes the direction of travel promoted through the draft Planning Framework for NPF4. It is gratifying that the commitments to tackling the climate crisis and global climate emergency are clearly stated, have primary importance and that there are clear efforts to minimise emissions and to improve air quality. The wider perspective of NPF4 over previous frameworks is encouraging and there is greater alignment across policy initiatives particular with transport, i.e. the National Transport Strategy NTS2, Strategic Transport Projects Review (STPR2) and the 20% reduction in car kilometres by 2030. We welcome the importance being attached to place-based approaches, especially by embedding the 20-minute 'liveable' neighbourhood approach and that sustainable transport through rapid transit networks, public transport and active travel are seen as nationally important developments. Our detailed comments are provided below:

2. National Spatial Strategy map – alignment with functional economic areas.

Transform Scotland supports the inclusion and use of the national spatial strategy map and the setting out of the overarching spatial strategy for Scotland. We acknowledge the view that NPF4 is the spatial expression of the national Economic Transformation Strategy and that this approach should apply at both regional and local level with the Regional Spatial Strategies and the Local Development Plans.

In that context, while recognising the overlaps that occur with the proposed Action Areas, we note that each area contains a complex array of urban and rural, coastline and inland, environmental and infrastructure challenges. We would therefore say that the Universal policies should have elevated status and stronger criteria, while together the thematic policies should respond in an integrated way.

While understanding this broad sweep of policy issues across each Action Area, when it comes to the integration of policy and the collaborative delivery and implementation of national developments, there could be a more explicit mapping of these areas to the emerging regional landscape. So that, at a regional level, NPF4 and the Regional Spatial Strategy is also the spatial expression of the Regional Economic Strategies, i.e. functional economic areas closely aligned to Travel to Work Areas (TTWAs), and that there is a direct linkage with the statutory Regional Transport Strategies.

3. Place-based approaches – incorporate 20min neighbourhoods.

In general terms, Transform Scotland supports the place-based approach, the Place Principle and a holistic approach to policy making and delivery that is integrated rather than directed in separate silos.

Local authorities are crucial in the delivery of the policy targets because the planning system is, in effect, delivered at local level. NPF4 will guide development plans and decisions that are made at the local level. Local authorities are critical to this. The localisation agenda through 20-minute neighbourhoods will also be delivered through local authorities and how they plan and bring forward new development.

The challenges for local authorities will be around resources and skills. The planning system in Scotland is a discretionary system in which developers can negotiate policy areas and the infrastructure that they deliver in new developments. In an under-resourced planning system, planners have less time to negotiate that infrastructure and localisation, and delivery at local level.

For a stretched authority that has developers pressing to bring forward development, it is hard to push back and deliver things that are different from what has been done in the past. That is a big challenge, we understand that, since 2011, there has been a 20 per cent reduction in the number of local authorities' planning officers. Obviously, resources are being decreased. We will have both a skills and resourcing challenge in implementing NPF4.

The other challenge to keep in mind is the unevenness in this space and how organisations work together at local and national levels to bring consistency between local authorities. We know that some developers and local authorities push further and faster with the agendas than others and we will have to bring the tail along if we are to achieve the pressing and challenging targets set by national policy.

To a large extent much residential development over the last ten years has favoured the private car above other transport modes, and while this is now being addressed through better development and street design guidance there are opportunities to enhance neighbourhoods with sustainable solutions such as mobility hubs. A lot of benefits could be realised through them including the bus service improvement partnerships under the Transport (Scotland) Act 2019. The infrastructure of a multimodal hub might be funded by a local authority or through the bus partnership fund, and the operator would, in turn, commit to serving that hub with the required frequency, standard of vehicle and committed timetable. Another aspect to consider is integration with active travel that could include rail, depending on the type of multimodal hub. Many operators are already introducing integrated ticketing across bus services and ticketing could be integrated with rail fares and bike hire. NPF4 refers to mass transit networks in the major city-regions, where there is an opportunity to build in multimodal hubs from the outset.

With regard to the 20min neighbourhood, the jury seems to be out on whether to take a planning-led approach, in which local authorities direct the neighbourhoods and facilities in some way, or whether we take a more market-led approach. Transform Scotland would opt for a plan-led approach as leaving it to market forces will create uneven development and largely focus on those areas where funding is available via new development. All places should be afforded the benefit of locality planning and many older urban areas lend themselves to immediate adoption of the 20min 'liveable' neighbourhoods' approach. We would opt for the inclusion of 'liveable' into the policy statement so that it can include urban areas whose geography might be slightly larger than a 20min travel time to key facilities and rural areas where travel distances are longer.

There needs to be a more nuanced understanding of what 20-minute neighbourhoods deliver and of the infrastructure that is present in them. At a local level, we need to have a more rounded understanding of travel infrastructure and public transport services, but also of social infrastructure, community infrastructure and space for local businesses. The document could be more explicit about an understanding of the current inequalities for various groups. There is no mention of that in the document, and it seems to be missing from the general information about the concept of 20-minute 'liveable' neighbourhoods, and how the concept might affect those groups with protected characteristics (e.g. children, pregnant women, older people and families on low incomes). Planners, designers and practitioners need to understand how they are to deliver 20-minute 'liveable' neighbourhoods, so having it set out in accompanying guidance is important. On transport, local accessibility is about providing a high-quality network of walking and wheeling opportunities. It is about having well-designed and well-maintained streets, and attention being paid to there being dropped kerbs and crossings.

We should aim to take an approach in which the vehicle becomes a guest in the local neighbourhood and we think about walking, wheeling and cycling, rather than think about people in cars and providing for vehicles. A lot of retrofit and reconfiguring will be required to do that; as such, reference in NPF4 to forthcoming guidance on the topic would be helpful.

4. Action Areas for Scotland – support for regional development.

Building on the comments made above, Transform Scotland broadly welcomes the proposed Action Areas as they provide a vital vision and support for regional development in Scotland. They can provide the policy and spatial frameworks informing the Regional Spatial Strategies which we believe deserve significant weight following the abandonment of the Strategic Development Plans.

Whilst most action areas include mention of their respective city region or growth deal, more emphasis on these key investment vehicles would be welcome, particularly with regard to transport, e.g. in the case of the rapid transit networks. As well as following the principles of the sustainable investment hierarchy, there needs to be integrated investment to support a place-based approach and to accord with the Place Principle.

5. Support for the proposal of a capital investment programme.

Transform Scotland positively supports the idea of an accompanying capital investment programme in the way that STPR2 supports the strategic policy direction of NTS2. We believe the success of the NPF4 will very much lie in the implementation of the plan and key to this will be the delivery of the national developments. Transform Scotland is concerned, for example, that none of the national developments have been contained in the 21-22 Programme for Government, and the Infrastructure Investment Plan Scotland 2021-22 to 2025-26 only provides clear investment plans for Circular Economy Material Management Facilities, Digital Fibre Networks and the Dundee Waterfront. We are firmly of the view that there is a need for the Framework to be supported by a capital investment programme so as to ensure that its ambitions can be realised on the ground.

The issue of budget and spending is important, particularly in relation to delivery. To put the matter into context, there is around £7 billion being spent on trunk roads, which contrasts with the investment in active travel. The investment in active travel is tiny when compared with the multi-billion pound road building programme. It is clear that significant investment in active travel would repay us handsomely through emissions reduction, health benefits and improvements in air and environmental quality. If Transport Scotland directed even a relatively modest proportion of that £7 billion into the national cycle network and active freeways, we could do something dramatic very quickly.

6. Aligning national development with emerging Regional Spatial Strategies.

The adverse impacts of the climate crisis are becoming more obvious by the day and the sooner Scotland moves to a less car dependent society that utilises more sustainable energy sources the better. While NPF3 aimed to deliver a greener, more integrated and more equal transport network, it did not lead to significant change in the field of transport: there has been no significant change in key transport indicators in the intervening six years, with no reductions in Scottish climate emissions. NPF4 must commit to the transformative changes in transport that Scotland requires in order to create a transport network that is fit for the future.

In a period where rapid decarbonisation of transport is required, yet the demands for transport are increasing, strategic decisions around sustainable infrastructure investment need to be taken at a regional level, to ensure objective assessment of different infrastructure and other transport investments, thus supporting overall positive outcomes across an entire region, rather than locally positive changes that have a negative consequence in neighbouring areas. This is particularly relevant to the provision and standardisation of EV charging infrastructure, with opportunities to support existing re-fuelling businesses to provide for the transition to EVs and support a behaviour change that is prevalent in favour of widespread neighbourhood charging locations.

Regional co-ordination of transport development and delivery is the most effective way to ensure a high level, objective approach across expanding 'travel to work' areas, during a time critical time window for

achieving Scotland's Climate Change (Emissions) Act 2019 targets.¹ The need to formally strengthen the link between statutory Regional Transport Strategies, Regional Spatial Strategies and Local Development Plans as they develop is also time sensitive.

Giving significant weight to the climate emergency and taking account of contribution to emissions reduction reflects the need to place climate action at the heart of decision-making. This will require the capacity building and upskilling of planners and those professionals who support the planning system by a comprehensive programme of carbon literacy training with certification being seen as a requirement for master planning and decision-making on major developments.

The framework focuses on avoiding adverse emissions yet does not set out positive criteria with which to prioritise low carbon infrastructure that will be needed to achieve and sustain net zero by 2045. There needs to be a positive process of adoption of low carbon solutions, not just an avoidance of harmful impacts. Additional criteria could be included that would afford significant weight to emissions reduction, prioritise meeting net zero infrastructure needs, and judge environmental impact acceptability in the context of the need to respond to climate change.

7. Global climate emergency, climate action critical – climate literacy skills for planners.

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8. Human Rights approach, eliminate discrimination, promote equality.

Transform Scotland fully supports the stated commitment to adopt a legal framework that protects the rights of individuals and advances equality of opportunity. We welcome this consistent approach across key policy documents including NPF4, NTS2 etc. Planning and transport policy and proposed delivery in Scotland remains significantly skewed towards those that have wealth, assets and an existing high quality of mobility.

The balance of spend, both through capital investment and revenue support, while paying lip service to the sustainable investment hierarchy remains stubbornly fixated on a high carbon and largely exclusive transport system. This needs to change if the Scottish Government is to become an active agent for a just transition.

However, in respect of Policy 4, we support the contention of MACS that 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 set 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.

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 which cites climate change, biodiversity, health and wellbeing etc, but does not mention the need to reduce inequalities. This contrasts with NTS2, in which “Reducing Inequalities” is the first of four strategic pillars.

9. Promote design, quality and place – six qualities of successful places.

On Policy 6, Transform Scotland notes the updated policy on design, quality and place which requires that plans and proposals reflect the six qualities of successful places. Along with RTPI Scotland, although we support the more detailed policy approach to design, we are concerned over the imprecise wording in this section, with references to ‘sense of joy’ unlikely to support applicants or development management planners in developing or assessing proposals. In order to achieve more clarity on what makes successful places, we would advocate for the reframing of quality of design and place in line with themes set out in Place and Wellbeing Outcomes.³ To also better support placemaking aspirations, Transform Scotland would support a design policy section which better encapsulates placemaking consideration beyond planning applications. This could be achieved through merging policies 6 and 7 to ensure consideration of living locally and the 20-minute neighbourhood are fully embedded into the design considerations of all stakeholders from the beginning. We note that this policy section references Creating Places (2013) and Designing Streets (2010) national policy statements. Both of these documents will need to be updated to reflect a changed policy and societal context, especially with regard to key ambitions around net zero carbon, a post-Covid green economy, place-based approaches, health and wellbeing and community wealth building.

10. Infrastructure First – Infrastructure Investment Plan, Sustainable Investment Hierarchy, NTS2 & STPR2.

Infrastructure First, Climate Emergency and Nature First are the right principles but need to be meshed together. There is a lack of integration and there are overlapping, repetitive, unclear and inconsistent policy requirements.

As identified in the Infrastructure Commission for Scotland Report 2020,⁴ an infrastructure first approach must be taken towards development. Appropriate infrastructure must be in place to be more than capable of handling long term impacts of climate change and climate events in increasing frequency in new developments and appropriate measures should be undertaken to address existing development.

Planning guidance for green and blue infrastructure should be updated (as current policy dates from 2006 (PAN79 Water & Drainage) to 2011 (Green Infrastructure) to reflect the increased impact of climate change and move to regulation of implementation rather than best practice. Adopting green and blue infrastructure approaches will improve resilience for climate impacts whilst offering opportunities to encourage carbon capturing and boosting biodiversity in all communities.

Infrastructure is absent from the *Spatial Principles for Scotland 2045* – if included, it could provide a golden thread. Planning via NPF4 could be an enabler of infrastructure to meet Scotland's needs and address environmental challenges. Principles of an evidence-based approach and early identification are welcomed; however, NPF4 would benefit from an implementation mechanism at national level – e.g. infrastructure to achieve net zero by 2045 – as well as through LDPs.

At present, the framework only partially engages with the Infrastructure Commission for Scotland recommendations. Policy 8 should be extended to integrate future National Infrastructure Needs Assessments (ICS Recommendation 3) with spatial planning.

Transform Scotland welcomes the new infrastructure-first principle that is set out in NPF4 but we would like that to go further so that new development is infrastructure-led. Where new housing is planned, we need to have the walking, wheeling and cycling network and the public transport links constructed early, so that the people who move into the houses have options from day one. It is no good planning a bus or rail link that will open after five years or, in some cases, ten years. You cannot shift people's behaviours at that point. It is worth thinking about strengthening the infrastructure-first idea into an infrastructure-led approach. That is critically important for active travel and public transport.

Just to point out that some policies are not Infrastructure First compliant. For example, Policy 29 – Urban Edges goes beyond settlement management purpose to apply restrictive and unclear sequential and locational tests to essential infrastructure and renewable energy.

11. Sustainable transport and 20% car km reduction road map.

With reference to Policy 10, "Reducing inequalities should be added to the objectives in the first paragraph to make it consistent with NTS2.

Transform Scotland welcomes the focus that is being placed firmly on sustainable and active travel for the first time ever in national planning and transport policy. There are references to the sustainable travel hierarchy throughout. There is alignment in the messaging on where we need to focus to improve our travel network and we would advocate for the investment in the capital programme to follow this lead, which it is not quite doing as yet. In the short-medium term, there needs to be an emphasis on patronage recovery. Collectively, we need to build up that patronage and strengthen the public transport network if we are going to make public transport an affordable and comprehensive alternative to the car. Clearly, for any of this to work, the big ambitions must be delivered. A key weakness in NPF4 and NTS2/STPR2 relates to how the ambitions will be delivered and the timeline. NPF4 is clear that the climate emergency is the priority and that we have to make a rapid and just transition, but we do not have any sense of the timescales for delivery or of which interventions and projects will deliver the greatest reduction in emissions over time. We need to get a sense of that first. That is a big missing part of the agenda not just in NPF4 but also in NTS2/STPR2.

We cannot wait three years, as the traffic reduction route map says, for a strategy about demand management. Transform Scotland believes that it is needed now, and we need to start implementing it. There is a big question about how national projects, the national network and rapid transit are delivered, and over what timescales. The policy ambitions, policy statements, and national developments seem to have been written as stand-alone statements. Perhaps they need to be justified, but there appears to be a gap between the high-level rhetoric and policy goals to what happens on the ground and what people see in their local neighbourhoods. That is the big challenge for all the policy statements recently published.

Transport Scotland delivers strategically on other types of transport infrastructure, so it should now take the lead on the delivery of cycling and active travel infrastructure. At present, there is a great deal of unevenness in development and delivery of the network. The overly competitive approach, where local authorities have to bid for money from a pot, holds the danger that some authorities become very good at it, they have the

skills and resource to do it and they successfully develop networks. However, neighbouring authorities that are perhaps less resourced do not do that, so the people who live there, the citizens of those places, do not benefit from the funding or from infrastructure developments despite an obvious need.

We have to think seriously about delivery of the national walking, cycling and wheeling network, but NPF4 does not say anything about who will be responsible for it. The NPF3 referred to delivery responsibilities. We would like Transport Scotland to have a strategic role on active travel. As further public funding is invested into active travel, Transport Scotland should oversee it and co-ordinate it strategically with RTPs, local authorities and the active travel delivery partners in order to deliver what we need for the emissions reduction and car-kilometres reduction targets that the Government has set.

12. Energy Links to Transport - Sustainable Tourism.

In order to meet the net zero carbon targets for 2045 and to prepare for the ban on petrol and diesel car sales from 2030, there needs to be a stronger link and synergy between energy and transport policy in the document. National Development 12 may help planning to act as an enabler of renewable energy and this could be linked to transport hubs as detailed below. It could assist in efficient, proportionate and consistent decision making to standardise a national network. However, it is weakened by a lack of clarity and detail, no direct links to net zero and sectoral targets, no identification of the technology challenges or opportunities and seemingly detached from Policy 19 on Green Energy.

Renewable energy deployment at scale and pace is required to achieve the net zero targets by 2045 and a more supportive planning framework to support implementation is essential. The positive language in the document needs to go beyond a high-level statement and set out clear consenting implications. Policy 19 on Green Energy should be linked to Policy 2 on Climate Change and National Development 12.

There could be a stronger statement on Sustainable Tourism, Policy 17. It is acknowledged that Scotland's tourism potential remains heavily reliant on the private car. There needs to be a move away from this and in the development of the public transport and EV charging networks, that there is potential for eco-tourism areas to thrive. This could be supported by National Parks Plans and the application of Mobility as a Service (MaaS) platforms that promote sustainable transport, as in the pilots supported by Transport Scotland.⁵ Expanding the long distance active travel network, as proposed in STPR2, would provide excellent opportunities for active and sustainable tourism.

13. Digital infrastructure – reduce the need to travel.

Transform Scotland supports the proposal to enhance the provision of digital infrastructure to reduce the need to travel and to embed the change in working patterns that were adopted during the pandemic.

Referencing the comments above on the link between energy and transport, we are not convinced that NPF4 is designed to sufficiently account for the roll-out of EV chargers on the scale that will be needed. Also, the focus tends to be on the urban rather than the rural.

The issue goes back to the earlier point about multimodal hubs and the possibility of using existing infrastructure to provide those settings. Chargers do not have to be near or at someone's residence, they can be in many other places. Adapting the 20-minute 'liveable' neighbourhoods concept for the rural context of course means providing such infrastructure at hubs, e.g. schools, caravan parks. There is a need to design centres where people can charge their car, pick up their parcels, go to the library, get healthcare and access leisure facilities. Those things need to be joined together and that is where NPF4 could extend the envelope by thinking more creatively and imaginatively about those concepts and linking them together.

There are interesting transport and energy pilot projects involving hydrogen, and technologies that might be imagined in the future. We should be aware and reference them now because the plan is meant to be in place for many years and is meant to guide us through the 2030 deadline, towards 2045. An adaptation and integration of strategy is required, so it is important that there is a lot more thought about the nuances of policy in the rural context.

14. Town centres – guidance on density levels.

Our cities suffer from traffic congestion as a result of the car culture that has developed since the Second World War in the UK, which has led to excessive amounts of road space being allocated to motor traffic with little or no consideration to the more active, healthy and sustainable modes of travel. This congestion also leads to substantial economic costs due to, for example, lost time and unnecessary fuel consumption. This trend also has a negative impact on health and the low levels of walking and cycling, due to lack of the high-quality infrastructure available in many of our European neighbouring countries.

That is why Transform Scotland supports Policy 24 that Local Development Plans should support sustainable futures for city, town and local centres and identify a network of centres. This should reflect the principles of 20-minute 'liveable' neighbourhoods along with the town centre vision and take into account how they are connected by public transport and walking, wheeling and cycling.

We also support the concept of 'compact growth' and the statement, *"By increasing the density of settlements we will reduce the need to travel unsustainably and strengthen local living."* Transform Scotland acknowledges the recent work undertaken by Centre for Cities in their study 'Getting Moving' on how transport can support levelling-up and highlighting the disparities with European cities in the travel times to urban centres.⁶

It illustrates how there is a productivity gap due to weak public transport accessibility, in Glasgow's case to the tune of £137m per annum. While the NPF4 draft document seeks to promote a more intricate mix of land uses and density, it is disappointing that there is no clearer articulation of what this means and no preferred formal density measures which we believe could be adopted within a settlement hierarchy approach.

15. National Developments.

On a technical point, the Planning (Scotland) Act 2019 removed the special status granted to national development under S25 of TCPA(S) 1997. This needs to be replaced and more clearly defined through NPF4 for national developments to retain a degree of primacy and value. Using the national developments as a policy tool is supported but requires more evidence, procedural guidance and specific direction for decision makers to apply in a development context.

Transform Scotland supports the inclusion of High Speed Rail, ND13, within the suite of national developments and has been disappointed at the seeming halt by Transport Scotland of the business case work to develop these proposals. This must form an essential and integrated part of a national spatial strategy that connects strategic places and supports sustainable, inclusive economic growth while reducing carbon emissions.

Transform Scotland would support the proposal, made by MACS, for the inclusion of 'transport interchanges' into the list of National Developments, to also include mobility hubs where these provide for multi-modal travel choices. In the guidance to the Transport (Scotland) Act 2005 we note that Regional Transport Partnership (RTPs) have been given the lead on transport integration and interchange. The specific requirement of the Act is for the Regional Transport Strategy (RTS) to show how transport in the region will integrate with transport elsewhere. This could be through the development of effective interchanges at railway and bus stations, ports and airports to integrate incoming with onward travel. This regional perspective will be important to ensure that the management, operation and interoperability (charging standards, charges etc.) are comparable, short of adopting a national approach.

We note and support the evolution of the National Cycling Network from NPF3 into the National Walking, Cycling and Wheeling Network. Linking to the concept of mobility hubs, we would welcome an explicit statement that the network, including hubs, should be both accessible and affordable. Accessible so that a family could opt to use the network/hub and that its upgrade should remove the barriers, physical and financial, to disabled people using adapted bikes, tricycles and mobility equipment. The availability of non-standard and e-bike hire schemes is crucial to avoiding disabled people being excluded from the national network. There must also be good design at the intersection with the pedestrian environment, linking network and designated safe routes (dropped kerbs, hard top surface, width of pathways, signage etc.).

These principles, while adopted as an exemplar for the national network, should be encouraged as the standard across local networks with the encouragement for similar standards adopted in Local Development and Local Transport Plans.

Investment is also required to provide more sustainable links between our cities and towns. Transform Scotland proposes the following additional measures:

1. A major upgrade to the inter-city rail service between Scotland's cities. Significant reductions in journey times could be achieved by the provision of dual track at selected locations and the reinstatement of a direct link between Inverkeithing and Perth by way of Kinross. This forms our 'National Inter-City Rail Network' proposal.
2. Enhanced freight movement throughout Scotland and reduce the volume of HGVs on roads and, as consequences, reduce greenhouse gas emissions and congestion on busier roads. This is the focus of the 'National Low-Carbon Freight Network' proposal.

The question of how we deliver the significant changes in carbon emissions in the necessary timelines is a central concern of Transform Scotland. The first timeline is to 2030, then there is the timeline to 2045. If we do not get electrification of the high-speed links until the early 2030s, we will be in significant danger of missing our target. We have to provide strategic links, because they are important for replacing and providing a viable alternative to short-haul flying, in particular for Anglo-Scottish trips, which is much worse in a carbon- emissions sense than high-speed rail. We need to consider which projects we need to do first. If Transport Scotland did that on behalf of the Scottish Government, as part of its transport decarbonisation plan, then perhaps some of the investment could be directed towards the types of very long-term, strategic projects that will help us to shift away from short haul flying.

Given Scotland's dependence on maritime transport for intra-regional connectivity and for extra- regional trade, port development is of great importance. Through NPF4, we must look to optimise our port and harbour infrastructure where appropriate, building on the nation's successful oil and gas activity and food/ drink and forestry sectors, and move towards decarbonization. NPF4 can assist this transition to low carbon in the transport sector by helping to develop and support innovative pilots that would otherwise be difficult for any single local authority or other public body to advance.

16. Reference STPR2, city & regional growth deals.

We welcome reference to STPR2, City and Regional Growth Deals within the draft document as a clear recognition that growth and regeneration plans often lead planning policy but that planning should move quickly to reinforce the principles of inclusive growth and sustainable transport as already defined in policy decisions that have been widely consulted on. More than ever there is a need for a clear pathway and policy framework from NPF4 – RSSs – LDPs. There is also a need for better integration of governance at a regional level.

However, there is a lack of a coherent strategic policy framework in planning that holds and nests these policy initiatives. As the ecosystem of regional governance evolves it becomes clear that to abandon the concept of the Strategic Development Plans was a mistake. There needs to be a suite of policy documents that sit at the regional level and are aligned, integrated and interdependent. The region is also a 'place' and should abide by the Place Principle. This should be explicitly stated and reinforced in NPF4.

The development of the National Transport Strategy NTS2 was supported by a Roles & Responsibilities Group that looked at the future of transport governance and published their report in July 2019.⁷ The conclusion of their work detailed the following:

"Our future transport governance arrangements should be on the basis of some form of regional model allowing for variations in approach between different geographic regions. The case for change has been made and that the current arrangements are no longer sustainable."

The conclusions drawn by the Road and Responsibilities Group were supported by an intensive study undertaken by Jacobs, the lead consultants for NTS2.⁸ The principal observation of that study can be summarised in the following paragraph:

*“It was clear from the assessment of the current Status Quo that significant improvements needed to be made. A greater focus on the **regional level of governance** emerged most strongly from the assessment in addressing these concerns. This provided a clear focus for the development of more refined variant options in the option development, with one of these - Variant 2 (**Growth Deal / Region Partnership Alignment**) emerging as the strongest and most deliverable option to take forward for further refinement and development.”*

The move towards a collaborative approach to regional governance has been further developed by the promotion of a nation-wide system of Regional Economic Partnerships as encouraged by the Scottish Government. The introduction of REPs also appears likely to reinforce the significance of the new geographies emerging through the growth deals, as these will no longer simply be groups of local authorities coming together to deliver specific sets of projects, but will become spaces for wider ranging strategic collaboration, including being responsible for the preparation of Regional Economic Strategies.

As NPF4 is rightly considered to be the spatial expression of the national Economic Transformation Strategy, so too at a regional level and there needs to be ‘parity of esteem’ between the policy documents and the governance framework that drives them. Therefore, there should be a strengthened mandatory requirement for Regional Spatial Strategies to put them on a par with the Regional Transport Strategy and Regional Economic Strategy. There should be serious consideration of a functional combined authority model where partners in a region possess the maturity to manage that strategic governance approach.

17.Guidance on Prioritisation & Policy Imperatives.

Decisions need a clear starting point, logical process and end outcome. There is an absence of prioritisation and clear guidance for decision-makers. How will decisions involving multiple policies, benefits and impacts actually be made? Could a decision-tree be introduced that would provide a hierarchy of policy imperatives and help with decision-making?

Clarity, consistency and predictability are vital – requirements to gain consent must be clearly understood and objective. NPF4 should provide a coherent strategy and clear directions to influence infrastructure development and underpin consistent and robust consenting decisions. Significant policy choices and prioritisation challenges are inevitable, they cannot be avoided and some guidance could be provided to aid local planners through the process.

18.Summary Conclusion.

Transform Scotland believes that there are many positive developments in the proposed framework for NPF4. We welcome the importance being attached to place-based approaches, especially by embedding the 20-minute ‘liveable’ neighbourhood approach and that sustainable transport through rapid transit networks, public transport and active travel are seen as nationally important developments. Having said that, the high-level policy statements could be supported by a greater clarity of definition and more helpful thematic integration.

Delivery could be enhanced by greater collaboration in support of national developments and via a regional governance framework. The framework would be strengthened by an accompanying capital investment programme. Local decision-making would be improved through clear guidance on prioritisation and clarity of policy imperatives. The introduction of NPF4 should be supported by a resourcing and development plan for planners and planning related professionals that incorporates the key requirement of carbon literacy training.

Finally, there is a need for a greater level of intersection with other significant strategic policy statements, including those made by the UK Government, such as the Community Renewal Fund, Levelling Up Strategy and Shared Prosperity Fund along with the City Region and Growth Deals, as these may well provide the channels of funding that are required to make a reality of the bold strategic vision provided within the draft NPF4 framework.

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- 1 <https://www.legislation.gov.uk/asp/2019/15/enacted>
 - 2 <https://www.legislation.gov.uk/asp/2019/15/enacted>
 - 3 <https://www.improvementservice.org.uk/products-and-services/consultancy-and-support/planning-for-place-programme/place-and-wellbeing-outcomes>
 - 4 <https://infrastructurecommission.scot/page/key-findings-report>
 - 5 <https://tactranenable.scot/loch-lomond-and-trossachs-national-park/>
 - 6 <https://www.centreforcities.org/wp-content/uploads/2020/03/Getting-moving-transport-infrastructure-in-cities-2020.pdf>
 - 7 <https://www.transport.gov.scot/media/45102/national-transport-strategy-transport-governance-working-group-report.pdf>
 - 8 <https://www.transport.gov.scot/media/45100/national-transport-strategy-roles-and-responsibilities-assessment-of-transport-governance-in-scotland.pdf>

Scotland's alliance for sustainable transport

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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).