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## Response from Paths for All

### Summary

NPF4 will be important in ensuring that planning policies and decisions support the creation of better places to live and work and the improvement of the health and wellbeing of people living in Scotland.

The National Planning Framework has six intended outcomes: improving the health and wellbeing of our people; increasing the population of rural areas; meeting housing needs; improving equality and eliminating discrimination; meeting targets for emissions of greenhouse gases; and securing positive effects for biodiversity.

It includes a range of proposals which are relevant to the Paths for All vision for everyone in Scotland, no matter who they are or where they live, to benefit from walking – including:

- Liveable places – including 20-minute neighbourhoods, sustainable travel, and transport
- The Central Scotland Green Network
- A National Walking, Cycling and Wheeling Network
- Urban Mass/Rapid Transit Networks

We welcome the emphasis on addressing the climate crisis, place-based approaches, living more locally - the 20-minute neighbourhood approach - and a presumption against out-of-town retail. This should be coupled with redefining how we use our town centres (Town Centre First principle) and promoting greater density in housing – “compact growth” – this makes sustainable travel more achievable.

We support the vision of a net zero future, nature-positive places, more resilient to the impacts of climate change. This includes reducing the need to travel unsustainably, and walking, wheeling (use of wheelchair), cycling and the links to public transport will be key to this. The long-term priority within the NPF4 must be to address the climate change emergency that we all face. To do this the framework will need to influence several areas of policy – including environment, transport, infrastructure, and health.

This is a huge opportunity to support behaviour change through planning and infrastructure development. The NPF4 will be a key document that influences

Scottish Government decisions and future policy development and will influence local planning and development decisions.

The provision of good quality walking, wheeling, and cycling infrastructure, combined with access to good, affordable public transport is required to move people away from the predominance of private car use. Given the Scottish Government intention to reduce car km by 20% by 2030, this is a priority. For decades we have been creating places dominated by car use – we now need to change how we design and use our communities - particularly in towns and cities.

Emphasis should be given to reallocating space from cars to people in all future developments – The recent report: “Stealing Our Cities” shows city space being overwhelmingly used for private cars. Across each case study, space dedicated to cars ranged between 34.5% and 41%.

<https://www.scotlandfutureforum.org/research-report-stealing-our-cities-city-space-being-overwhelmingly-used-for-private-cars/>

The Public Health and Sustainable Partnership group, hosted by Public Health Scotland, carried out a Health Impact Assessment to understand whether people’s health was improved by changing road space for motor vehicles to other uses.

The group found that road space reallocation can make a difference. By reducing overall traffic volume, the adverse health impacts of motor traffic such as air and noise pollution, and greenhouse gas emissions are likely to be reduced. Other health benefits may be realised but are dependent on using the space differently, such as improving the walking, wheeling, and cycling infrastructure, providing additional space for people to shop or socialise, or for children to play.

<https://publichealthscotland.scot/news/2022/march/living-well-locally-road-space-reallocation-contributes-to-improved-health/>

The pandemic has demonstrated that we can change our behaviour overnight when we need to, we trust that the NPF4 will give impetus to create better places for us all. It will be particularly important as it will form part of the statutory development plan and will be used to determine planning applications.

Just transition - we agree that we must ensure that, as we reduce our emissions and respond to a changing climate, that journey is fair and creates a better future for everyone. Walking, wheeling, and cycling, the development of paths, and promotion of active travel should run through all the spatial principles.

The draft Framework aligns well with the aspirations of Paths for All’s new strategy which sets out our vision to improve people’s lives and rebuild as a happier, healthier, and greener nation through walking. [Step It Up](#) aims to tackle physical inactivity, poor mental wellbeing, health and transport inequalities and the climate emergency.

Our view is that delivery of the plan will only be possible through system change and that this needs to be explored more. NPF4 should be a key document that influences

Scottish Government decision making and serves as the core of future policy development in Scotland.

Some issues around the draft:

- It says many of the right things, but the test of its success will be how it is delivered – the delivery plan is still in development.
- The delivery plan and monitoring programme and resources and funding will be crucial to the success of the Framework.
- Some of the language needs to be more robust so it can stand up to challenge in the future – less “should” and more “must”.
- There will be a need for essential training and skills development for staff and all elected members to enable effective and consistent delivery at a local level – the framework is wide ranging and cuts across policy areas. Guidance to be used by all planning authorities will need to be produced to enable consistency and not 34 different approaches.
- There will be capacity and resource issues for many organisations – including planning authorities but also the third sector and community groups.
- The success of the framework will be mutually dependent on the strength and commitment to delivery of other strategies and policy areas – e.g., National Transport Strategy, STPR2, Car km Route Map, etc.
- How developers embrace the framework and take on board its ambition will also be crucial.
- Reducing the need for travel / transport, sustainable transport and walkable places will be key to creating places where people want to locate and develop businesses.
- NPF4 must make clear reference to the need for planning decisions and developments to protect existing local paths and extend where appropriate.

In many ways we have been doing the wrong thing for decades – creating places designed around the car. We need to turn this around in a very short timescale. This will require a change in mindset for all of us – and political buy-in, bravery and leadership at local and national levels to make change happen.

## **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

**Sustainable:** We agree that every planning decision at national and local levels should contribute to Scotland becoming a more sustainable place, particularly reducing the need to make short trips by private car and increasing opportunity for reduced or sustainable travel.

**Liveable:** We agree that places should be designed to facilitate walking, wheeling, and cycling, active recreation, play, and the enjoyment of the natural and built environment. Active places are important for our health and wellbeing.

**Productive:** We agree with the aim to create a “wellbeing economy”. Walkable places are more successful economically.

**Distinctive:** We agree with a place-based approach to create people centred communities.

We welcome the vision of a net zero future, nature-positive places, more resilient to the impacts of climate change.

We consider that the overarching longer term priority within the NPF4 must continue to be to address the climate change emergency that we all face. It is essential that the framework is aligned and delivered in conjunction with several key policies – including those relating to transport, infrastructure, and health.

Our particular interest is in enabling people to travel actively and sustainably. Walking, wheeling, and cycling are key to this, as are the links to public transport.

The public mood on climate change has shifted significantly. Transport emissions are a major cause of climate change where the trends are headed in the wrong direction. There is an urgent need for system change in transportation as part of our approach on climate. Planning is part of the solution. The Scottish Parliament has strong targets and commitment to increasing action on this in the next decade.

NPF4 will also be important in ensuring that planning policies and decisions support the creation of better places to live and work and the improvement of the health and wellbeing of people living in Scotland.

Traditional economic measures are failing us – they drive climate change, environmental degradation, and social inequalities. We need to shift to measures of health and wellbeing, social justice, and reduced inequality to guide our approach to planning. The National Performance Framework is a start at this approach. This also incorporates the UN Sustainable Development Goals.

The NPF4 should be fundamentally informed by, and designed to deliver, these outcomes. Investment decisions need to reflect this – a shift to smaller scale, more local, sustainable projects can potentially spread the benefits more widely across communities.

Resources will be important in achieving this – for example there will need to be sufficient funding for developing path networks, and active travel. There should be an increase in revenue funding to support local authorities in maintaining path networks to a high standard.

Any increased capital budget must be followed with a proportionate increase in the maintenance budget. The Scottish Parliament's Rural Economy and Connectivity Committee recommended that the Scottish Government should deliver a means by which cycle, and footpath maintenance and improvements are more fully integrated with wider road maintenance work to support policies designed to encourage active travel.

<https://archive2021.parliament.scot/newsandmediacentre/113664.aspx>

The Scottish Government cannot deliver change alone. There is a role to support local communities to make change. This is what we try to deliver through our programmes - including Smarter Choices Smarter Places, Walking for Health and Community Paths. The NPF4 should seek to achieve the same – and there is potential for our work to support its delivery

We suggest that 'reduce the need to travel unsustainably' might be changed to a more positive 'increase the use of sustainable transport'

## 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?**

We welcome the vision of future places, homes and neighbourhoods that are better, healthier, and more vibrant places to live. This fits well with the aspirations of Paths for All for a healthier, happier, greener Scotland, where everyone has the opportunity to be active every day.

<https://www.pathsforall.org.uk/resources/resource/paths-for-all-strategic-statement>

We agree that the COVID-19 pandemic offers challenges but also an opportunity to improve places for people.

We welcome the intention to create places with good-quality homes close to local facilities and services by applying the concept of 20-minute neighbourhoods. We want to make better use of our spaces to support

physical activity, relaxation, and play, to bring people together and to celebrate our culture, diversity, and heritage. We hope to empower more people to shape their places.

Walking, wheeling, and cycling are key to this.

### 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?**

We welcome future places that attract new investment, and facilitate new ways of working – improving economic, social, and environmental wellbeing.

Reducing the need for travel and transport, promoting sustainable transport and walkable places will be key to creating places where people want to locate and develop businesses. Reduce the amount of out-of-town developments, reutilise in town buildings and sites before allowing for urban sprawl etc.

Walking, wheeling, cycling, and public transport are key to this.

### 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?**

We welcome the vision of future places that are distinctive, safe, and pleasant, easy to move around, welcoming, nature-positive and resource efficient.

We welcome the commitment to place-making.

Walking, wheeling, and cycling are key to this. Access to green and blue space is essential

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

We consider that NPF4 is one of the most important opportunities to support behaviour change through planning and infrastructure development.

Our view is that delivery of the plan will only be possible through system change and that this needs to be explored more. NPF4 should be a key document that influences Scottish Government decision making and serves as the core of future policy development in Scotland.

The current Covid-19 crisis demonstrates that people respond to calls to dramatically change behaviour when there is a clear need.

The provision of good quality walking, wheeling, and cycling infrastructure, combined with access to good, affordable public transport is required to move people away from the predominance of private car use. Given the Scottish Government intention to reduce car km by 20% by 2030, this must be a priority for the NPF4. Provision must be made For those with disabilities, that require access to a car.

An issue to consider is how we encourage and support large organisations – both in the public and private sector to align to deliver this plan.

One of key delivery mechanisms is the national transport hierarchy – how will it be used to set priorities?

There will be a need for a clear delivery programme for the framework. This will need to show how resources and funding will be made available to turn the aspirations into reality on the ground.

There will be a need for a consistent approach from all developers and it will be important to consider how that will happen. How will private sector delivery link into the plan? There will be a need for better alignment through NPF4 as has not always happened within development plans.

There is need for better support for local authority planners from the reporter unit to uphold decisions. There should be greater scrutiny of planning committees if they go against planning official advice – professional planners need certainty that committees will be held to more account.

We are hopeful that the appointment of chief planning officers – a requirement of the Planning (Scotland) Act 2019 – will result in planning gaining greater priority within local authorities and better co-ordination across Scotland.

<https://www.legislation.gov.uk/asp/2019/13/section/50/enacted>

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?**

We broadly support these - in particular:

- **Compact growth** - we agree denser settlements will reduce the need to travel unsustainably and strengthen local living and which will support travel by foot, bike, and public transport.
- **Local living** - we support networks of 20-minute neighbourhoods where people can access everyday services within a short walk or cycle of their home.
- **Balanced development** – we agree development should be spread to create opportunities in areas of decline and reduce development pressure in areas of high demand.
- **Conserving and recycling assets** – we agree with making use of existing buildings, places, infrastructure, and services and locating major new developments in areas already well served by existing infrastructure, particularly at locations near public/active travel hubs.
- **Urban and rural synergy** – we agree best practice from urban, rural and island development should be shared between authorities, and green infrastructure extended into urban areas to connect people with nature and assist in biodiversity recovery. Particularly in more deprived areas
- **Just transition** - we agree that we must ensure that, as we reduce our emissions and respond to a changing climate, that journey is fair and creates a better future for everyone.

Walking, wheeling, and cycling, the development of paths, and promotion of active and sustainable travel should run through all of these principles

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?**

North and west coastal innovation

**Q 8: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?**

**Q 9: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?**



We agree that the 20 min neighbourhood concept needs a flexible approach to recognise different contexts - which can include service hubs in key locations with good public transport links. Demand Responsive Transport will be important in meeting travel needs where there are no conventional services.

We agree there is a need for smaller scale investment across the area to put in place low maintenance, carefully designed facilities which better support and manage the impact of informal tourism.

The same principle applies to walking and wheeling infrastructure for day-to-day local trips.

We recognise the importance of digital connectivity and the part it can play in enabling remote working, reducing travel, etc.

#### Northern revitalisation

**Q 10: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?**

**Q 11: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?**

We agree 20 minute neighbourhoods can be tailored to work with both larger towns and more dispersed settlements.

We agree remote working can help build economically active local communities.

We agree with the intention to support services for outdoor activities such as mountain biking, climbing, and walking.

We agree the need to manage sustainable tourism and outdoor access.

We support the intention to complement existing physical connections, smart solutions, local hubs, demand responsive transport and active travel networks.

There is a need for smaller scale investment across the area to put in place low maintenance, carefully designed walking infrastructure for day-to-day local trips.

We support the shift to more sustainable transport.

We support continued investment in the National Long Distance Cycling and Walking Network.

#### North east transition

**Q 12: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?**

**Q 13: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?**

We support a new focus on local living to help to address the high levels of car ownership and respond to the area's dispersed settlement pattern and to promote more compact growth.

We support a shift towards 20-minute neighbourhoods.

There is a need for smaller scale investment across the area to put in place low maintenance, carefully designed walking infrastructure for day-to-day local trips.

We support creating multifunctional blue and green networks and improving green spaces in and around settlements, connecting with the National Long Distance Cycling and Walking Network and facilitating active travel.

We agree with prioritising sustainable transport.

Central urban transformation

**Q 14: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?**

**Q 15: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?**

We agree that, given where the bulk of the population live, our most urban communities hold the key to reducing emissions from the way we live our lives.

We support a concerted effort to develop a network of 20-minute neighbourhoods, and clusters of communities with fair access to a range of services that support sustainable living.

We support a significant shift to a more people centred approach.

We agree that active travel networks will need to expand to make walking, wheeling, and cycling an attractive, convenient, safe, and sustainable choice for everyday travel.

There is a need for smaller scale investment across the area to put in place low maintenance, carefully designed walking infrastructure for day-to-day local trips.

We agree there is a need to do more to tackle poor health outcomes. This should also address health inequalities and ensure that interventions do not inadvertently widen these.

We support urban greening initiatives.

We support the intention to substantially reduce levels of car-based commuting, congestion, and emissions from transport at scale.

#### Southern sustainability

**Q 16: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?**

**Q 17: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?**

We agree that finding a new way of rural living that is consistent with climate change will be a challenge for this part of Scotland, given the relatively high levels of dependence on the car and the dispersed population.

We support a tailored response to the 20-minute neighbourhood concept. The 20 min neighbourhood concept needs a flexible approach to recognise different contexts - which can include service hubs in key locations with good public transport links. Demand Responsive Transport will be important in meeting travel needs where there are no conventional services.

We would support aspirations to become a prime outdoor recreation and green tourism destination.

We agree active travel should be supported with wheeling, walking, and cycling within and between towns and other communities linked to strategic routes for residents and visitors.

There is a need for smaller scale investment across the area to put in place low maintenance, carefully designed walking infrastructure for day-to-day local trips.

We agree better digital connectivity may unlock the potential of rural living and home or hub working.

#### National Spatial Strategy

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

We agree this is a helpful way of addressing the differing needs and priorities across Scotland within the context of national priorities.

Generally, there is a need for smaller scale investment across Scotland to put in place low maintenance, carefully designed walking infrastructure for day-to-day local trips.

## 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?**

**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?**

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

### **Central Scotland Green Network:**

We very much support this.

We support an emphasis on placemaking, 20-minute neighbourhoods, access to green and blue space, nature and promotion of walking, wheeling, and cycling.

### **National Walking, Cycling and Wheeling Network:**

We very much support this national development to facilitate the shift from vehicles to walking, cycling, and wheeling for everyday journeys.

As an organisation we anticipate being closely involved in its delivery.

It is important to ensure that the network truly is for walking and wheeling as well as cycling. Walking is particularly important – given the numbers and its accessibility to most people.

This should include:

- Promotion of walking and cycling in a number of localities taking a multi-intervention approach.
- Promotion of the redesign streets and neighbourhoods to prioritise walking, wheeling, and cycling to create better places for people with a concentrated multi-intervention approach.

- Support encouraging small scale sustainable transport projects across Scotland.

A strategic approach to transport does not need to be about big, flagship, investment. It can also be about encouraging small scale investment at a local level across the whole country and engaging community / led by community / partnerships. Investment in these projects should bring local economic benefit and development of skills, community capacity and climate resilience. Target communities that would benefit most (SIMD).

Generally, there is a need for smaller scale local investment across Scotland to put in place low maintenance, carefully designed walking infrastructure for day-to-day local trips.

An important consideration is how this will link into public transport – virtually all trips on bus, tram or train also involve walking or wheeling.

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

We support this to reduce transport emissions at scale and support transformational reduction in private car use.

Walking is an important part of most trips on public transport and there is also a need to improve walking infrastructure and links.

There is a need to improve our walking environment and other infrastructure linking to public transport – including bus stops. Active travel and public transport are intricately linked, particularly for pedestrians. Virtually every trip by public transport involves walking at some stage. Buses are particularly important given the number of people that use them and the range of communities they serve. 76% of all public transport journeys are by bus.

### **Urban, Sustainable Blue and Green drainage solutions:**

There are opportunities to integrate this with improving recreation opportunities and active travel routes.

### **Circular Economy Material Management Facilities:**

### **Digital Fibre Network:**

We agree this can complement a new emphasis of living locally.

### **Island Hub for Net Zero:**

## **Industrial Green Transition Zones:**

### **Pumped Hydro Storage:**

### **Hunterston Strategic Asset:**

We welcome the inclusion of active travel links.

### **Chapelcross Power Station Redevelopment:**

We welcome inclusion of active travel.

## **Strategic Renewable Electricity Generation and Transmission Infrastructure:**

### **High Speed Rail:**

### **Clyde Mission:**

We welcome supporting local living and to improve quality of place, generate employment and support disadvantaged communities.

We support new and/or upgraded active and sustainable travel and recreation routes and infrastructure.

Emphasis should be given to reallocating space from cars to people in all future developments.

### **Aberdeen Harbour:**

We welcome the intention to enhance access and improve the quality of green space and active travel options and improve transport infrastructure, including for sustainable and active travel. Emphasis should be given to reallocating space from cars to people in all future developments.

### **Dundee Waterfront:**

We agree it will be important to support sustainable and active transport options - including new and/or upgraded active and sustainable travel routes.

This should address the less well-designed aspects put in place to date on the waterfront. For example, more than 34% of space in the Dundee Waterfront is currently allocated to cars (car parks, on street parking, roads).

<https://www.scotlandfutureforum.org/research-report-stealing-our-cities-city-space-being-overwhelmingly-used-for-private-cars/>

Emphasis should be given to reallocating space from cars to people in all future developments.

### **Edinburgh Waterfront:**

We support new and/or upgraded active and sustainable travel routes. Emphasis should be given to reallocating space from cars to people in all future developments.

### **Stranraer Gateway:**

Active travel options should be included. Emphasis should be given to reallocating space from cars to people in all future developments.

### **Other comments on the National Developments section of the NPF4**

Recent developments with coronavirus highlight the need to reallocate space and infrastructure to support the National Transport Strategy travel hierarchy – particularly for walking, wheeling, and cycling.

Emphasis should be given to reallocating space from cars to people in all future developments – The recent report: “Stealing Our Cities” shows city space being overwhelmingly used for private cars. Across each case study, space dedicated to cars ranged between 34.5% and 41%.

<https://www.scotlandfutureforum.org/research-report-stealing-our-cities-city-space-being-overwhelmingly-used-for-private-cars/>

The importance of sustainable travel and the possibilities around reducing travel have been highlighted by the pandemic.

There is increased recognition that planning, and place have a significant impact on the health of the nation.

There is a recognition of the importance of technology – including broadband.

This may be an opportunity to capitalise on behaviour change – building a new normal – but this will rely on developing the right projects as we come out of crisis – NPF4 will be a major factor in this.



The recovery of public transport, including multi modal travel, and how this interacts with planning post-crisis will be a major challenge – particularly for bus services.

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

#### **Protection of public access to land and routes**

We are concerned that clear requirements for provision and protection of public access to land and routes included in Scottish Planning Policy are absent from NPF4.

SPP (at paragraph 221) requires that 'The planning system should.... provide for easy and safe access to and within green infrastructure, including core paths and other important routes, within the context of statutory access rights under the Land Reform (Scotland) Act 2003' and (at paragraph 228) that ' Local development plans should safeguard access rights and core paths, and encourage new and enhanced opportunities for access linked to wider networks.' We would like to see the 'shoulds' changed to 'musts'

Whilst we welcome the strong references to green and blue infrastructure, greenspace, green networks, and active travel included in the draft NPF4, this does not include core paths, rights of way and other important local routes that planning has a really important role in protecting and enhancing.

NPF4 should make clear reference to the need for planning decisions and developments to protect existing local paths (including key informal routes) and to facilitate non-motorised connectivity for the purposes of health, social inclusion and modal shift. Without such a reference, there is a real danger that developments will not be required to accommodate existing paths nor provide connections to the wider paths network.

#### **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?**

Yes

But we consider health, wellbeing, and equality should also be included as guiding principles.

Policy 1: Plan-led approach to sustainable development

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

We support a plan-led approach.

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?**

We agree significant weight should be given to the Global Climate Emergency.

We are not sure how the policy will balance climate commitments with the public interest. This probably needs some exploration.

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?**

We agree that development plans should facilitate biodiversity enhancement.

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?**

We agree that planning should respect, protect, and fulfil human rights, seek to eliminate discrimination, and promote equality.

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 support a people-centred approach to local economic development.

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 ?**

We agree with the proposals on design, quality, and place.

Policy 7: Local living

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

We agree the need to reduce the need to travel unsustainably and to encourage people to live more locally.

We agree this can be achieved by building on the Place Principle in the creation of 20-minute neighbourhoods.

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?**

We support an infrastructure-first approach embedded in Scotland's planning system. This must include active travel route development.

Consideration should be given to taking an infrastructure levy approach to achieving this.

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?**

We must stress the importance of placing sustainable travel – including walking, wheeling, cycling and public transport – at the heart of housing provision in future. This will be vital if we want to deliver on the environmental, social, and economic targets of Scottish Government.

We need to move away from large greenfield housing developments around our towns and cities towards smaller, denser developments and bringing residential developments back into existing urban settings. We need to make

town centres places to live in (and not just for the those with penthouses) – as they were in the past. This will require a substantial change in mindset for developers and landowners but there should be no option to not change. We need to turn around decades of doing the wrong thing, creating places designed around cars rather than people. We also have a short timescale for achieving this change.

#### 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?**

We support the aim to reduce the need to travel unsustainably by prioritising locations for future development.

Walking is the most accessible and practical way for most people to get more active and offers huge physical, social, and mental health benefits. The quality of our environment influences whether we choose to walk or not and we believe every Scottish community should have well designed walkable streets and paths. Places that are more ‘walkable’ have more people using the streets.

#### Policy 11: Heat and cooling

**Q 33: DO YOU AGREE THAT THIS POLICY WILL HELP US ACHIEVE ZERO EMISSIONS FROM HEATING AND COOLING OUR BUILDINGS AND ADAPT TO CHANGING TEMPERATURES?**

#### 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?**

We support the intentions on blue and green infrastructure, play and sport. There can be a close relationship between active travel and blue and green infrastructure and supporting biodiversity.

Welcoming, safe, and accessible outdoor environments can improve our physical, mental, and social health by allowing people to be physically active outdoors and helping people to connect with and get closer to nature.

We would support national standards for green infrastructure and development policies that strongly promote green infrastructure.

Policy 13: Sustainable flood risk and water management

**Q 35: DO YOU AGREE THAT THIS POLICY WILL HELP TO ENSURE PLACES ARE RESILIENT TO FUTURE FLOOD RISK AND MAKE EFFICIENT AND SUSTAINABLE USE OF WATER RESOURCES?**

Policies 14 and 15: Health, wellbeing and safety

**Q 36: DO YOU AGREE THAT THIS POLICY WILL ENSURE PLACES SUPPORT HEALTH, WELLBEING AND SAFETY, AND STRENGTHEN THE RESILIENCE OF COMMUNITIES.**

We agree local development plans should aim to create vibrant, healthier, and safe places and should seek to tackle health inequalities.

We agree that planning has a key role in influencing health – particularly physical activity, diet and obesity, and mental wellbeing.

Planning can deliver walkable neighbourhoods that encourage physical activity.

Planning has the potential to address inequalities by ensuring everyone can live in a good quality environment.

Placemaking, active travel, housing, green infrastructure, town centres and air quality are all part of this picture.

Priority should be given to communities that will benefit most and to narrow inequalities.

Policy 16: Land and premises for business and employment

**Q 37: DO YOU AGREE THAT THIS POLICY ENSURES PLACES SUPPORT NEW AND EXPANDED BUSINESSES AND INVESTMENT, STIMULATE ENTREPRENEURSHIP AND PROMOTE ALTERNATIVE WAYS OF WORKING IN ORDER TO ACHIEVE A GREEN RECOVERY AND BUILD A WELLBEING ECONOMY?**

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?**

Tourism depends on policy areas including active travel, green networks, leisure and recreation and transport. Path networks have a key part to play in this.

Planning has a key role in ensuring the benefits of tourism are balanced with social and environmental outcomes. Sustainable travel should be a goal for tourist development.

Policy 18: Culture and creativity

**Q 39: DO YOU AGREE THAT THIS POLICY SUPPORTS OUR PLACES TO REFLECT AND FACILITATE ENJOYMENT OF, AND INVESTMENT IN, OUR COLLECTIVE CULTURE AND CREATIVITY?**

Policy 19: Green energy

**Q 40: DO YOU AGREE THAT THIS POLICY WILL ENSURE OUR PLACES SUPPORT CONTINUED EXPANSION OF LOW CARBON AND NET-ZERO ENERGY TECHNOLOGIES AS A KEY CONTRIBUTOR TO NET-ZERO EMISSIONS BY 2045?**

Policy 20: Zero waste

**Q 41: DO YOU AGREE THAT THIS POLICY WILL HELP OUR PLACES TO BE MORE RESOURCE EFFICIENT, AND TO BE SUPPORTED BY SERVICES AND FACILITIES THAT HELP TO ACHIEVE A CIRCULAR ECONOMY?**

Policy 21: Aquaculture

**Q 42: DO YOU AGREE THAT THIS POLICY WILL SUPPORT INVESTMENT IN AQUACULTURE AND MINIMISE ITS POTENTIAL IMPACTS ON THE ENVIRONMENT?**

Policy 22: Minerals

**Q 43: DO YOU AGREE THAT THIS POLICY WILL SUPPORT THE SUSTAINABLE MANAGEMENT OF RESOURCES AND MINIMISE THE**

## **IMPACTS OF EXTRACTION OF MINERALS ON COMMUNITIES AND THE ENVIRONMENT?**

Policy 23: Digital infrastructure

**Q 44: DO YOU AGREE THAT THIS POLICY ENSURES ALL OF OUR PLACES WILL BE DIGITALLY CONNECTED?**

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?**

We agree local development plans should support sustainable futures for city, town and local centres and identify a network of centres.

We agree this should reflect the principles of 20-minute neighbourhoods and the town centre vision and consider how they are connected by public transport and walking, wheeling, and cycling.

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 be subject to an assessment statement. Green belts should be protected and in town sites used for housing, retail etc.

Policy 30: Vacant and derelict land

**Q 48: DO YOU AGREE THAT THIS POLICY WILL HELP TO PROACTIVELY ENABLE THE REUSE OF VACANT AND DERELICT LAND AND BUILDINGS?**

Vacant and derelict land should be repurposed as a priority for housing retail, leisure ahead of out-of-town sites

Policy 31: Rural places

**Q 49: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT RURAL PLACES CAN BE VIBRANT AND SUSTAINABLE?**

We support the intention to ensure rural places are vibrant and sustainable

Active and sustainable travel and consideration of the principles of 20-minute neighbourhoods in some areas are key to this

Policy 32: Natural places

**Q 50: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND RESTORE NATURAL PLACES?**

We support the intention to protect and restore natural places.

Policy 33: Peat and carbon rich soils

**Q 51: DO YOU AGREE THAT THIS POLICY PROTECTS CARBON RICH SOILS AND SUPPORTS THE PRESERVATION AND RESTORATION OF PEATLANDS?**

Policy 34: Trees, woodland and forestry

**Q 52: DO YOU AGREE THAT THIS POLICY WILL EXPAND WOODLAND COVER AND PROTECT EXISTING WOODLAND?**

We support the intention to expand woodland cover and protect existing woodland and the multiple benefits this will bring.

There will need to be care in ensuring the right woodland is created or improved in the right places.

Policy 35: Coasts

**Q 53: DO YOU AGREE THAT THIS POLICY WILL HELP OUR COASTAL AREAS ADAPT TO CLIMATE CHANGE AND SUPPORT THE SUSTAINABLE DEVELOPMENT OF COASTAL COMMUNITIES?**



## **Part 4 - Delivery**

Delivering our spatial strategy

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

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

We generally agree with the proposed priorities for the delivery of the spatial strategy.

## **Part 5 - Annexes**

Annex A

**Q 56: DO YOU AGREE THAT THE DEVELOPMENT MEASURES IDENTIFIED WILL CONTRIBUTE TO EACH OF THE OUTCOMES IDENTIFIED IN SECTION 3A(3)(c) OF THE TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997?**

Annex B

**Q 57: DO YOU AGREE WITH THE MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR) NUMBERS?**

Annex C

**Q 58: DO YOU AGREE WITH THE DEFINITIONS SET OUT IN THE GLOSSARY? ARE THERE ANY OTHER TERMS IT WOULD BE USEFUL TO INCLUDE IN THE GLOSSARY?**

## **INTEGRATED IMPACT ASSESSMENTS**

### Environmental Report

**Q 59: WHAT ARE YOUR VIEWS ON THE ACCURACY AND SCOPE OF THE ENVIRONMENTAL BASELINE SET OUT IN THE ENVIRONMENTAL REPORT?**

**Q 60: WHAT ARE YOUR VIEWS ON THE PREDICTED ENVIRONMENTAL EFFECTS OF THE DRAFT NPF4 AS SET OUT IN THE ENVIRONMENTAL REPORT? PLEASE GIVE DETAILS OF ANY ADDITIONAL RELEVANT SOURCES.**

**Q 61: WHAT ARE YOUR VIEWS ON THE POTENTIAL HEALTH EFFECTS OF THE PROPOSED NATIONAL DEVELOPMENTS AS SET OUT IN THE ENVIRONMENTAL REPORT?**

**Q 62: WHAT ARE YOUR VIEWS ON THE ASSESSMENT OF ALTERNATIVES AS SET OUT IN THE ENVIRONMENTAL REPORT?**

**Q 63: WHAT ARE YOUR VIEWS ON THE PROPOSALS FOR MITIGATION, ENHANCEMENT AND MONITORING OF THE ENVIRONMENTAL EFFECTS SET OUT IN THE ENVIRONMENTAL REPORT?**

### Society and Equalities Impact Assessment

**Q 64: WHAT ARE YOUR VIEWS ON THE EVIDENCE AND INFORMATION TO INFORM THE SOCIETY AND EQUALITIES IMPACT ASSESSMENT?**

**Q 65: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE EQUALITIES IMPACT ASSESSMENT?**

**Q 66: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE CHILDREN'S RIGHTS AND WELLBEING IMPACT ASSESSMENT?**

**Q 67: DO YOU HAVE ANY COMMENTS ON THE FAIRER SCOTLAND DUTY AND THE DRAFT NPF4?**

**Q 68: DO YOU HAVE ANY COMMENTS ON THE CONSIDERATION OF HUMAN RIGHTS AND THE DRAFT NPF4?**

**Q 69: DO YOU HAVE ANY COMMENTS ON THE ISLANDS IMPACT ASSESSMENT?**

### Business and Regulatory Impact Assessment

**Q 70: DO YOU HAVE ANY COMMENTS ON THE PARTIAL BUSINESS AND REGULATORY IMPACT ASSESSMENT?**

**Paths for All**

**March 2022**

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