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Infrastructure and Capital Investment Committee
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ICI Committee: National Planning Framework 3

1.0 Key Points

- NPF3 should enable Scottish Government to work better with its partners in local government, industry and elsewhere. Currently the Scottish Government stake in delivery is not sufficiently clear to enable others to contribute effectively.
- For NPF3 to function effectively as a spatial strategy it should make stronger links between the policy aims to develop in accessible locations like towns and cities and practical measures to ensure that this happens.
- The general lack of safe routes and designated walking and cycling networks to local shops, schools and services is a national problem requiring a new framework for local action.
- Sustainable development delivers stronger economic growth since it secures social and environmental value alongside economic benefits. There is greater potential for growth in economic activities to add value to under-utilised resources and waste. This should include smarter travel investment to add value to the benefits of infrastructure investment.

2.0 Introduction

- 2.1 This submission follows up verbal comments I made at the evidence session on 29 January 2014. It has been written to provide the detailed referencing for a few of the points.

3.0 A More Enabling Framework

- 3.1 The principles of the proposed NPF3 are strongly supported, but the mechanisms to deliver these in practice are not sufficiently clear. For national aims to be converted to local action there need to be clear enabling mechanisms to back up the policies. Funding policies for each of the identified programmes and projects would provide a framework within which more of the investment could be brought forward. Scottish Government can make much better use of each public £ by using it to lever in other investment, so NPF3 should identify the funding framework for each project. The

current list of projects, with no indication of how they will be funded, could give the impression that Scottish Government will entirely fund these projects undermining opportunities to raise funding from non-government sources.

- 3.2 Government could focus less on what it delivers itself such as trunk road schemes and more on enabling others to succeed. At a policy level there are references to community planning but the links through to investment in community projects of national significance are weak. The recommendations made by the Institution of Civil Engineers about improving decision making and managing costs are pertinent (see page 4 of <http://www.ice.org.uk/getattachment/9e8d79ea-792d-4307-bb9d-96b2efaab821/State-of-the-Nation-Transport-report--Scotland-201.aspx>)
- 3.3 The expected impacts of new road and rail infrastructure are also vague. Due to increased congestion and lower track speeds in recent years the trend has been for road and rail journey times to increase, except in a few localised places. New infrastructure and services can enable shorter journey times but more specifics are needed about the reduced journey times, costs, safety, emissions which are being sought. Lack of clarity about the ambition, opportunity and place making benefits will undermine the ability to achieve these aims.
- 3.4 If the full economic, social and environmental costs of new development were to be factored into planning, then the costs of developing on greenfield land would be relatively greater than the costs of developing in town centres. If practical planning is to reflect planning policy aims, then the stated connectivity policies need to be defined more clearly in terms of comparative travel times and costs by car, public transport, walking and cycling. Some countries zone developer contributions for each class of development based on the accessibility profile of the location by each mode. Where travel times to employment centres and essential services by walking, cycling and public transport are more than about 3 times the drive times, development locations will be car dependent so, regardless of whether there are public transport connections, developer contributions should be much higher to reflect the full costs of this (see also <http://www.dhc1.co.uk/news/accessibilityevidence.pdf>).
- 3.5 Developers will continue to prioritise the locations that offer the best profits, so if NPF3 policies for development on brownfield land are to be delivered, this will require substantial change in the way developer contributions are managed. This could include integrating contributions within new funding arrangements like the UK Government's City Deals initiative.

4.0 Capital Investment and Society

- 4.1 Sustainability needs three pillars for stability: economy, environment and society. In NPF3 the plans to invest in society less clear than the plans for the economy and the environment. At a policy level there is recognition that smart towns and cities are as

much about investing in people as in technology, but the planned spending programmes are largely investment in 'things' rather than people.

- 4.2 When we looked at the Scottish Government's Smarter Choices Smarter Places programme we found that investment in provision of infrastructure and services when combined with effective promotion to local people delivered very much greater return on investment than the delivery of infrastructure alone, and that promotion in isolation from provision was of questionable value.
- 4.3 The reason for this is not hard to see. Scotland's underutilised resources are empty shops in town centres, unemployed people in poor housing, and empty roads and footpaths in deprived areas. Upgrading the local built environment in conjunction with marketing local travel opportunities and partnering with local businesses links social, economic and environmental goals. Individual local initiatives may not be national projects but the lack of them collectively across the country is a national problem. A national planning framework should help fix national problems such as this.
- 4.4 In most parts of Scotland, and even in the Smarter Choices Smarter Places towns at the end of the investment programme, there were many barriers to simple journeys like walking to local shops or schools. However the government's assessment of the NPF proposal for a 'safer routes to school' programme was that this was a local issue. Our research suggested that new national enabling measures were needed. These could usefully be included in NPF3. (recommendations for Scottish Government are given in para 8.23 of http://www.transportscotland.gov.uk/files/SCSP_-_Goingsmarter_-_Final_version_-_Do_not_edit.pdf)

5.0 Transport Development Areas

- 5.1 Land use developments around airports are identified in draft NPF3 but not around railways stations, transport hubs like park and ride sites, and bus stops and stations. There is brownfield land in key locations near rail stations across Scotland which has remained undeveloped for years as developers sit on the land and watch their asset grow in value. Much stronger action is needed to ensure that land in the most accessible locations is developed quickly with specific provision in NPF3 to support the development of such land, similar to the detailed proposals for land around airports.

Thank you for the opportunity to contribute

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