Local Government and Communities Committee
Planning (Scotland) Bill
Submission from Cycling Scotland

Question 1 – Do you think the Bill, taken as a whole, will produce a planning system for Scotland that balances the need to secure the appropriate development with the views of communities and protection of the built and natural environment?

We broadly support the proposed Bill as outlined. Emphasis should be placed on development which helps to design places where people can live healthier lives, move around more easily, and have access to the homes, services and facilities that they need.

There is documented evidence which highlights the importance of cycling and active travel considerations within the planning system. Key policies include:

- A presumption in favour of cycling, walking and sustainable transport in the planning infrastructure.
- Support for car free developments where appropriate.
- Cycle parking provision in new developments and retrofitting, in particular on-street secure cycle parking in high density locations.
- Restriction of the ability to modify or discharge planning obligations.

Consideration of these priorities in the planning system will help to protect the built and natural environment and ensure that development is sustainable.

Question 2 – To what extent will the proposals in the Bill result in higher levels of new house building? If not, what changes could be made to help further increase house building?

To help ensure that decisions related to housing are resilient long-term, innovative and low impact, provision for cycling and active travel should be prioritised within housing developments and there is a need to ensure that it is considered across every development. Cycling is space saving, makes places more attractive and friendly for people to be in, and benefits the environment.

Cycling and active travel are compact modes. Cycling saves around a third of road space compared to driving. Cycle parking takes up eight times less space than car parking where for every car parked, eight bikes could be parked in the same amount of land-space. On average, vehicles are parked more than 80% of the time which places significant demand on space. Increasing the provision of cycling (and walking) facilities in an area increases the desirability and live-ability of the area. Prioritising cycling friendly measures can help to populate urban areas by attracting younger residents which can help in terms of longer-term economic activity. As this group are less likely to drive, they benefit from being closer to employment and
education opportunities\(^1\). The viability and attractiveness of cycling in an area can influence the embedded transport costs of living in an area, including, for example, whether households choose to purchase a second car.

Cycling friendly infrastructure can also encourage more people to cycle by helping to improve safety, and address safety concerns. It is therefore crucial that planners are supported to focus not just on the traffic impact of new developments but, whether, in reality, people will be able to cycle or walk to access jobs, goods and services in their community. In building much needed homes, it is essential that accessibility is properly considered with adequate links to a comprehensive cycle network, focused on journeys between 1 and 5 miles.

**Question 3 – Do the proposals in the Bill create a sufficiently robust structure to maintain planning at a regional level following the ending of Strategic Development Plans and, if not, what needs to be done to improve regional planning?**

Relevant partners in an area should be enabled to work together to effectively strengthen planning and decision making, supporting community involvement and buy-in. When discussing planning cycling and walking, any limiting of engagement with the community and relevant delivery partners would prove problematic and could negatively impact the take up and success of specific measures and schemes put in place to improve and promote more active travel. At a regional level, it is also important to ensure that cycling and active travel are considered in planning decisions. As such, any changes to Strategic Development Plans should be considered in relation to the provision of other opportunities for stakeholders and communities to be involved in planning, particularly around active travel.

**Question 4 – Will the changes in the Bill to the content and process for producing Local Development Plans achieve the aims of creating plans that are focused on delivery, complement other local authority priorities and meet the needs of developers and communities? If not, what other changes would you like to see introduced?**

N/A

**Question 5 – Would Simplified Development Zones balance the need to enable development with enough safeguards for community and environmental interests?**

We note reference to the Simplified Development Zones (SDZs) in the Bill and acknowledge the contribution they could make to simplifying the planning application process by removing the need for an individual planning application for each new development within the specified zone. However, there is no reference made in the Bill (as introduced) to how Simplified Development Zones will enable development which helps to safeguard environmental interests.

Schedule 5B subsection 3 (b) (i) refers to compliance with the Roads (Scotland) Act 1984. We note within this there is no reference to cycling and active travel, for example, such as granting consent for cycle path construction. Subsection 3 (b) (iii) does refer to compliance with Conservation Areas and Buildings, which is welcome and will assist in ensuring consideration of ‘place’ and ‘placemaking’. Cycling offers a range of positive environmental benefits, including improved air quality, increasing attractiveness of places, reducing congestion, and cutting the amount of land space used for transport, and so should be prioritised to help safeguard environmental interests.

Within planning, there should be a requirement to change the physical environment to prioritise short journeys, which will in turn help safeguard environmental and community interests. In Scotland, 61.1% of journeys are less than 5km², and journey length is a key determinant of the likelihood of an individual cycling. Planning decisions have a key role to play in determining if average journey distances continue to increase, and/or if additional traffic growth is generated over the next decade. Further, 68.5% of car journeys are less than 5 km³ ⁴, offering the greatest possibility to switch to cycling among those who do have access to a car. Adequate provision of cycling infrastructure is crucial to facilitate this shift to cycling, including accessible and secure cycle parking, segregated cycle lanes, filtered permeability to shorten journey length, and managing parking provision.

Some aspects of the Bill (e.g. Schedule 54E (1)) will require safeguarding of environmental interests to be prioritised initially to form part of any original permissions.

Question 6 – Does the Bill provide more effective avenues for community involvement in the development of plans and decisions that affect their area? Will the proposed Local Place Plans enable communities to influence local development plans and does the Bill ensure adequate financial and technical support for community bodies wishing to develop local place plans? If not, what more needs to be done?

Communities and places are shaped by the individuals who live there and the place/community in turn shapes the lives and behaviours of individuals. The proposed package of measures laid out in the Bill, including Local Place Plans, make some contribution to increasing community involvement in planning decisions, but more could be done.

The accompanying Financial Memorandum to the Bill states that the average cost of producing a Local Place Plan is estimated to be around £13,000. Some financial assistance is provided by the Scottish Government to assist with the cost, which is welcome. However, as Local Place Plans are designed to facilitate engagement by

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² Cycling Scotland (2017) Annual Cycling Monitoring Report
https://www.cycling.scot/mediaLibrary/other/english/1114.pdf
⁴ Car journey includes both driver and passenger car journeys
smaller, community level groups, before being considered by local planning authorities as part of Local Development Plans, such a cost is likely to be prohibitive and unaffordable for many grassroots community groups, thus inhibiting their ability to get involved in influencing local planning decisions.

We welcome the inclusion of the Place Standard Tool as a resource available to support community engagement/involvement. Within the tool, cycling and walking is mentioned in the moving around category, where it outlines that cycling and walking are good for health and that the layout and design of a place can encourage cycling and walking by providing pleasant and safe routes which connect people to where they want to go.

Planning decisions need to respond to the needs and wants of the community. Each community is different and so a dynamic approach is required to ensure that planning is suitable and relevant for each community. In relation to cycling (and active travel), this will involve installation of infrastructure that meets the needs of all parts of the community, including people who don’t have access to a car.

Getting more people in the community involved in the planning process is important, especially children and young people. There is currently a lack of engagement with this group, as was identified in the ‘Future of the Planning System’ consultation. Ensuring these are considered will mean that planning decisions made now will be more likely to reflect current and also shape future opportunities and behaviour choices of young people. Investment in cycling infrastructure, and activity involving young people and communities in planning decisions could help to increase the proportion of people cycling as their main mode of transport for their daily commute. People cycling are among the most satisfied transport users, indicating that they derive a higher utility of the time spent cycling than for example car drivers since the trip has value other than arriving at a destination, with nine out of ten people in a multi-national survey reporting that cycling makes them look more positively on the area where they live5.

**Question 7 – Will the proposed changes to enforcement (such as increased level of fines and recovery of expenses) promote better compliance with planning control and, if not, how could these provisions be improved?**

N/A

**Question 8 – Is the proposed Infrastructure Levy the best way to secure investment in new infrastructure from developers, how might it impact on levels of development? Are there any other ways (to the proposed Levy) that could raise funds for infrastructure provision in order to provide services and amenities to support local land development? Are there lessons that can be learned from the infrastructure Levy as it operates in England?**

The introduction of the Infrastructure Levy could be an effective way for local authorities to raise money to invest in new infrastructure developments. Local

planning bodies should be encouraged to specify cycling and active travel in their options for spending the money gathered from this Levy clearly laying out the types of developments on which the Levy is payable, and on what it can be spent, with a focus on encouraging any monies raised to be spent on cycling and active travel; who is liable to pay; and the amount payable.

Money raised from the Levy offers an opportunity to invest in walking and cycling and encourage modal shift and reduce inequality. For example, there is a risk that growth in car ownership further isolates those without access to a car, or forces car use on low income households who can find themselves without any viable means of travelling around their local area and to their place of work. In many areas of Scotland, particularly in cities like Glasgow and Dundee, around 50% of households do not own a car, and in Scotland as a whole, around a third of households do not own a car. This is patterned by deprivation, with the most deprived least likely to own a car.

**Question 9 – Do you support the requirement for local government councillors to be trained in planning matters prior to becoming involved in planning decision making? If not, why not?**

Yes, it would be helpful for councillors to have an awareness of planning matters to enable them to make more informed decisions about planning and associated factors in their local area. Cycling Scotland (along with active travel partners) runs a Continuing Professional Development programme that has a pathway module relating to Planning and Designing for Cycling (from an introductory module through to more advanced and practical modules). We would be happy to discuss how this could be made available to councillors or any other stakeholders who wish to better understand planning and design for cycling.

**Question 10 – Will the proposals in the Bill aimed at monitoring and improving the performance of planning authorities help to drive performance improvements?**

N/A

**Question 11 – Will the changes in the Bill to enable flexibility in the fees charged by councils and the Scottish Government (such as charging for or waiving fees for some services) provide enough funding for local authority planning departments to deliver high-performing planning system the Scottish Government wants? If not, what needs to change?**

N/A

**Question 12 – Are there any other comments you would like to make about the Bill?**

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6 Murie, J (2017) Active travel in Glasgow: what we’ve learned so far. A Glasgow Centre for Population Health (GCPH) report [http://www.gcph.co.uk/assets/0000/6007/Active_travel_synthesis_final.pdf](http://www.gcph.co.uk/assets/0000/6007/Active_travel_synthesis_final.pdf), page 38
It is important that planning policy aligns to other areas of policy, especially transport and climate change, as planning is especially relevant to and crucial in implementing these policies. In Scotland, we have excellent policy statements and guidance ready to be followed such as Scottish Planning Policy, the Town Centre first principle, National Maximum Parking Standards, Core Path Plans, the Place Standard and Designing Streets, to name a few. These policies, rather than being precedents from decisions made many years ago, should guide development to locations where it is more likely that people will travel sustainably and actively.