GCPH Consultation Response to the Fourth National Planning (NP4) Framework draft consultation
31 March 2022

Introduction

The Glasgow Centre for Population Health (GCPH) was established in 2004 to carry out research and support new approaches to improve health and address inequalities, while working in partnership with local organisations and communities. The centre's work is focused on Glasgow but with wider relevance across Scotland and there is a particular focus on poverty as a key determinant of a range of health and social outcomes. Since its inception, the GCPH has recognised the importance of spatial planning's role in influencing the determinants of population health and has undertaken a range of work to implement considerations of health and wellbeing into planning policies and practice. GCPH welcomes this consultation and the opportunity it gives for stakeholders to contribute to the development of a new National Planning Framework for Scotland. In this consultation we draw on learning from our own work and our knowledge of the wider evidence surrounding planning and health.

The places where people live and grow up, the environmental factors that they are exposed to, and the control they have over these exert strong influences on their health and wellbeing. These determinants are socially patterned and exhibit significant inequalities. The recent pandemic and control measures have intensified the impact of these influences and exerted additional, and not yet fully quantified, pressures particularly on the communities who are the most marginalised due to increasing health inequalities. Over the course of the pandemic the importance of safe homes, liveable local neighbourhoods and high-quality greenspaces and infrastructure came to the fore and highlighted how the social patterning of these environments added to the burden of ill health in the most deprived parts of Scotland. As Scotland recovers, the importance of the places where people live must remain central: good quality built and natural environments, secure and affordable housing, clean air, public and active transport infrastructure, places and spaces for regular physical activity, nutritious, affordable food, safe play, cultural opportunities, social connections and participation in the local community are all vitally important for health. Further, the hosting of COP26 has increased the spotlight on Scotland to demonstrate a legacy and further its commitment to a just transition to achieve net zero as the climate and nature emergencies reach a critical point.

National Spatial Strategy

We welcome the shift of spatial planning's role from one primarily focussed on economic growth to a more holistic 'forward-looking' approach that includes sustainability, liveability, productivity and distinctiveness over a 23-year timeframe. We welcome the six outcomes that the amended Town and Country Planning (Scotland) Act 1997 requires of the National Planning Framework, including: improving the health and wellbeing of our people; and improving equality and eliminating discrimination.

We also welcome the inclusion of six planning principles to consider for Scotland's needs alongside local spatial planning requirements and the collaborative approach being taken rather than a top-down, one-size fits all approach. This move allows for a greater recognition of the important role that planning can play in taking a proactive, preventative approach to improving population health and reducing inequalities. The Scottish Government's March 2022 report, 'Long-term Monitoring of Health Inequalities',[1] shows a widening of both relative and absolute inequalities in numerous key measures of population health since 2015. While the primary cause of health inequalities are socioeconomic, wider environmental influences also play a part.[2,3]

We also welcome the increased attention to developing resilience to climate change. The NPF's strong environmental and placemaking focus addressing the climate and biodiversity emergencies has multiple benefits as climate change is a major threat to health.[4] "Climate change together with ecosystem damage and biodiversity loss are by far the greatest public health threats of the century, not just globally, but to the United Kingdom."[5] It is also a threat multiplier in that existing social, environmental and economic stresses are likely to be exacerbated, particularly for the most vulnerable in society with fewer resources to cope,[6] underlining the importance of the draft's inclusion of 'just transition' and 'local living' spatial principles to avoid exacerbating inequalities in the transition to net zero.

Spatial Principles

We agree that these spatial principles will help to enable the right choices to be made about where development should be located. We recommend the addition of a "connected" network of 20-minute neighbourhoods within the local living principle as it is important to establish those connections not only within local neighbourhoods but across them as well. While not a spatial principle, an additional consideration in making choices about where development should be located is population growth and its geographic spread. We believe it is important for the NPF to include a demographic framework identifying potential growth areas and aligning with the Scottish Government's Population Strategy.[7]

Policies

General – Q22. We agree that addressing climate change and nature recovery should be the primary guiding principles for plans and planning decisions, however, this must align with policy and action to reduce health inequalities. Ensuring a just transition ought to be included in the primary guiding principles.

Policy 1 – Plan-led approach to sustainable development

No comments

Policy 2 – Climate emergency

We welcome this policy. Despite the commitments made at COP26, Nationally Determined Contributions (NDCs), combined with other mitigation pledges, still put the world on track for a global temperature rise of 2.7°C by end of the century. To keep global warming below 1.5°C this century, there is a need for additional policies and action to almost halve annual greenhouse gas emissions in the next eight years.[8]

Policy 3 – Nature crisis

We welcome this policy. Facilitating biodiversity enhancement, nature recovery and nature restoration has multiple benefits including both climate resilience and health. Well-functioning

ecosystems are vital for healthy communities, helping to limit disease and providing clean air and water.[9]

Policy 4 – Human rights and equality

As is acknowledged in this draft the amended Town and Country Planning (Scotland) Act 1997 requires NPF4 to advance equality and eliminate discrimination. We welcome this requirement and the addition of this policy and have specific recommendations about how to help this policy achieve the aim.

The policy needs to define what it means by respecting human rights and equalities and how the policy links to legislation (including the upcoming Human Rights Bill for Scotland,[10] Equality Act 2010[11] and the Public Sector Equality Duty,[12] the Community Empowerment (Scotland) Act 2015)[13] and statutory duties. Then the policy needs to explain what these linkages mean for spatial planning and to explain *why* this framework needs to respect equality and human rights. Including linkage to specific policies that are relevant to equalities and human rights could help to provide accountability and governance for how NPF4 will achieve its human rights and equality aims and how this will align with existing policies. NPF4 *could* position spatial planning as an important contributor and enabler of human rights and equalities on a structural and systemic scale that could potentially go beyond statutory duties and provide exemplars of good practice. However, the current absence of clear definitions of equality and human rights (in the glossary) and lack of reference to relevant legislation makes it difficult to answer the consultation question on this policy area. We recommend adding the definitions from the Equality Act 2010 and Public Sector Equality Duty and ensure the language is consistent throughout. The following terms and explanations need adding to this policy and the glossary: discrimination, diversity, eliminating discrimination (this needs to be added to the policy if it is included in the consultation question), equalities, fostering good relations, human rights.

It would be useful to know which equalities groups have contributed to the framework in addition to the Equalities and Human Rights Commission's contribution to the Call for Ideas. We'd hope to see minority-led equalities expert organisations included in gathering the necessary data and feedback in relation to informing the equalities and human rights policy.

The built and natural environment has the potential to foster social engagement and inclusion.[14] The Community Empowerment (Scotland) Act 2015[15] (and the 2018 Supplementary and Consequential Provisions)[16] and the subsequent revised National Standards for Community Engagement[17] aim to increase participatory democracy and allow people more of a say in developments, use of assets and in public services in their local area. Traditionally marginalised groups, such as those protected under the Equality Act 2010,[18] are often disproportionately affected by developments because of their lack of power and influence and are the least likely to have their voices heard in consultations. Innovative approaches to consultation are needed which lead to meaningful engagement through developing purposeful and trusted relationships with communities that act on community needs and ambitions. For a 'forward-looking' planning framework, taking a proactive approach to engaging communities would help to act now and as a preventative, restorative measure. Involving communities in decision-making processes can help to increase satisfaction with outcomes, improve mental wellbeing and help to build community capacity. For authentic engagement to occur, resources (including time, staff and money) need to be invested in community engagement programmes and in training and developing staff in community engagement skills and approaches.[19]

The draft National Planning Framework sets out where development and infrastructure is needed. Accordingly, we recommend that community development principles are considered so that priorities can be decided *with* communities, likewise for infrastructure. Physical infrastructure also needs to account for social infrastructure.[20] Physical spaces and places need to be accessible,

affordable, welcoming, safe and fit for purpose by Scotland's diverse communities[21] – both those with protected characteristics under the Equality Act and those not included in the Act but excluded by health inequalities and poverty. This could help to mitigate against the impact of place-based initiatives on communities who may number a minority in any given locality and therefore be "out-voted" by other community members who may not share the same requirements or ambitions.[22]

Policy 5 – Community wealth building

It would be helpful to provide a summary of the community wealth building objectives or provide a link where these objectives can be accessed. The role of the planning system in contributing to community wealth building requires articulation, e.g. the expectation for developer contributions for community benefits

Policy 6 – Design, quality and place

It is not entirely clear what is meant by the phrase "Development proposals should be designed to a high quality…". It is important that the same standards are applied across all neighbourhoods regardless of the socioeconomic characteristics of residents.

Policy 7 – Local living

We welcome the policy on local living and the commitment to the development of a network of 20 minute neighbourhoods. It is vital that future developments create places where people can meet their daily needs locally and not just build housing developments. There are multiple benefits that can be achieved as is recognised in the preamble, such as improving health and wellbeing, reducing unsustainable travel, reducing inequalities and creating climate resilient places.

A key aspect of a 20 minute neighbourhood is the safety of the local environment for active travel and for public transport use. 20 mph limits are committed to in the most recent Programme for Government.[23] Evidence suggests that 20mph speed limits are an effective public health intervention and that they can lead to reductions in speed, collisions and casualties.[24] Therefore, in development proposals a strong presumption should be given to applying 20 mph (or lower) speed limits.

There is a statement that seems to contradict the National Performance Indicator[25] on access to green and blue space. The NPF4 states that people should be able to meet their daily needs "within a reasonable walk, wheel or cycle (within approx. 800m) of their home" while the National Performance Indicator is a 5 minute walk (approx. 400m) to green or blue space. It would be helpful if there was alignment between the two.

Policy 8 – Infrastructure first

We agree with an infrastructure-first approach to planning. Ensuring that appropriate infrastructure (e.g. communications, transport, sewerage, green and blue infrastructure, educational, medical and cultural facilities) is in place prior to development is vital for the creation of healthy sustainable neighbourhoods.

Policy 9 – Quality homes

We welcome the policy on Quality homes and agree with the intention "…to support the delivery of high quality, sustainable homes that meet the needs of people throughout their lives". We also welcome the inclusion of quality, diverse homes in NPF4. We recommend that consideration is given to how quality homes meet communities' diverse needs (which would include ensuring that energy for homes is affordable and sustainable), e.g., for disabled people and people living with chronic

illness. Prior to the pandemic, it was known that disabled people across Scotland and the UK were more likely to face multiple disadvantage and destitution and less likely to have access to affordable, safe and secure housing than non-disabled people.[26] Thus, it would be helpful to link this policy to Policy 4 on Human Rights and Equality. It is also important to link this policy to Policy 7 to ensure that the demand for housing does not override the creation of sustainable places where local living can be achieved.

Policy 10 – Sustainable transport

This policy could be strengthened by encouraging and facilitating developments that reallocate road space away from motor vehicles, especially cars, towards more sustainable uses to support traffic management, encourage active travel and improve public space. Road space reallocation is likely to have positive health co-benefits due to reductions in overall motor traffic, which in turn will reduce air and noise pollution, greenhouse gas emissions, collisions, the severance effect and loss of public space.[27]

Development proposals should be expected to explicitly consider how to minimise the need for car use and to explain how the development will contribute to the shift toward much greater use of active and sustainable travel options. There needs to be priority given to promoting walkability of neighbourhoods, and maintenance of pavements.

As part of the process of creating better developments that support sustainable transport infrastructure, those people that are most at risk of exclusion and access barriers – e.g. older people, disabled people - should be involved in the early design stages of new infrastructure. For example, in relation to active travel infrastructure, these means ensuring the views and experiences of these groups are heard and that better designed paths and streets are built which are accessible to all. The Walking Connects programme delivered by Living Streets is an example of how to bring the voices of older people into decision making.[28]

Open Space Strategies should ensure access to off road walking and cycling that promotes access to greener, more sustainable environments.

Alternatives to car ownership such as car clubs and bike hire schemes should be supported and integrated into developments.

Policy 11 – Heating and cooling

We agree with the ambition to strive to achieve zero emissions from heating and cooling by connecting developments to existing heat networks. However, we think the policy should also help to address the large number of people in Scotland who are in fuel poverty (just under 25% of households in 2019)[29] and link to the Fuel Poverty Strategy 2021.[30] With increasing fuel prices, the percentage of households in Scotland in fuel poverty is likely to increase dramatically, which can impact both mental and physical health.[31]

Policy 12 – Blue and green infrastructure, play and sport

We welcome the recognition that blue and green infrastructure offer multiple benefits including but not limited to helping to address the nature crisis, climate resilience and health and wellbeing. However, there is no mention of the wide variation in the quality of blue and green infrastructure in neighbourhoods across Scotland with those living in areas of high socioeconomic deprivation being least likely to have access to high quality green, blue and grey space. Sharp inequalities in visiting green and open space continue to exist.[32]

It would be helpful to reference the Open Space Strategy/Play Sufficiency Assessment in this section.

Policy 13 – Sustainable flood risk and water management

We welcome the ambition to "…strengthen future resilience to flood risk by reducing the vulnerability of existing and future development to flooding" and the encouragement of natural flood risk management recognising the co-benefits to people and nature. There are both immediate health impacts of flooding (e.g. drowning, injuries, contaminated water, etc) and more medium to long term impacts such as the impact on mental health.[33] One study in England found that people whose homes were flooded or those whose lives were disrupted by flooding suffered significant negative mental health impacts that persisted for at least three years.[34]

Policy 14 – Lifelong health wellbeing

We welcome the policy on lifelong health and wellbeing and the ambition for the planning system to create "…vibrant, healthier and safe places and should seek to tackle health inequalities particularly in places which are experiencing the most disadvantage". Leadership is crucial and by highlighting the role of planning in improving health and reducing inequalities, NPF4 could become the driver for developing health considerations into local development plans in Scotland.

We feel that the role of place in shaping the social, economic and environmental circumstances that determine health could be strengthened. For example, neighbourhood design impacts employment and education opportunities, physical activity levels, travel patterns, access to healthy food, social connectivity, quality of life and mental and physical health outcomes. While the relationship between the environment and health is often complex and works alongside other factors, planning decisions have a significant and lasting impact on the social and economic conditions within neighbourhoods and thus on the environments in which people live and grow.

People living in more deprived areas tend to have on average worse health and live in poorer quality environments. They are more likely to experience poor quality housing (and the resulting health issues this gives rise to), vacant and derelict land, poor quality greenspace, public spaces and streetscapes, a lack of access to affordable healthy food and employment opportunities and are at an increased risk of injury or death from traffic. Isolation and depression are also more prevalent. The planning system has a vital contribution to make in reducing health inequalities by improving the environments of those living in the most disadvantaged areas.

We welcome the requirement for a health impact assessment (HIA) where significant negative health impacts might occur. However, a HIA not only identifies negative effects and makes suggestions for their mitigation, but also the potential positive health effects and makes recommendations for their enhancement. We would encourage an inequalities focus to the HIAs (Heath Inequalities Impact Assessments) in order that differential impacts are identified and mitigated where possible to avoid unintentional exacerbation of inequalities.

We welcome the support for local community food growing and allotments which may help to alleviate the increase in food insecurity after the pandemic, particularly among vulnerable groups.[35] There is also a need for more land to be allocated for agroecological farming and there are huge opportunities for peri-urban areas to connect urban and rural economies through more food growing, providing new jobs, goods and services. A recent report, published by Sustain, highlights the edges of towns and cities with access to markets and histories of market gardens, as a way to generate new green jobs, goods and services with money going back into communities.[36]

Policy 15 – Safety

No comments

Policy 16 – Land and premises for business and employment

Agroecological farming is an approach where food is produced by working with nature, rather than against it, and is traded fairly through closer relationships between producer, trader and consumer covering seed to soil to plate. This systemic approach creates multiple social, economic and ecological benefits in peri-urban areas including:

- Increased access to regionally-produced, nutritious, culturally-appropriate foods
- Generation of goods and services that support community wealth-building
- Provision of jobs and training in a regional economy
- Access to green space and outdoor learning at the edge of built-up cities
- Support for community development through community-owned resources, events, and volunteering
- Sequestration of carbon through farming approaches that work with natural cycles in effect creating 'carbon-sinks' surrounding urban space
- Increased biodiversity through companion planting and integration into agro-forestry.

These multiple benefits and public goods can support local, regional, and national government to meet existing goals covering climate change, biodiversity, enterprise and employment and more. In terms of urban planning, agroecological farming on the fringes of cities can assist a green economic recovery by using farming methods that retain the ecological benefits of peri-urban areas and greenbelt land, while also building economies that connect the urban and the rural.

Recent research estimated that the conversion of 1.4% of land growing cereals and grassland to vegetables around the city could produce an additional 1.3 million kg of food for communities. Considering the increase in both demand for regionally-produced foods, and demand for land by a new generation of growers, there is an opportunity for government, at different levels to meet these demands. For example, they could mobilise land, infrastructure and investment to support new green economies that channel funds to local communities, produce locally produced food and provide local employment.[37]

It is therefore important that NPF4 enables an increase the amount of land and other physical spaces, particularly in peri-urban areas, available for agroecological farming and make these available for new initiatives. Furthermore, it should prioritise safeguarding of land for peri-urban agroecological farming that are Grade 1 and 2 soils, rather than used for other development and ensure planning policy does not inhibit peri-urban enterprise growth. NPF 4 should also support the local and national policies to develop more sustainable food systems and explicit links should be made to the forthcoming Good Food Nation legislation.

Policy 17 – Sustainable tourism

No comments

Policy 18 – Culture and creativity

No comments

Policy 19 – Green energy

No comments

Policy 20 – Zero waste

No comments

Policy 21 – Sustainable aquaculture

No comments

Policy 22 – Minerals

No comments

Policy 23 – Digital infrastructure

We welcome the ambition for digital inclusion across Scotland, but it is not only rural areas that currently experience exclusion. A recent GCPH study of health trends and inequalities in Glasgow undertaken during the pandemic highlighted specific issues, many related to the wider impact of the pandemic on society which need to be addressed[38]. Examples include our reliance on digital technology which has increased during the pandemic but raises the danger of digital exclusion in education and for particular groups that may struggle to access or use digital technology. Government needs to ensure that there is comprehensive and affordable access to digital technology and that there are alternative ways of providing services and information for those people who face difficulties using digital media.

Policy 24 – City, town, local centres

No comments

Policy 25 – Retail

No comments

Policy 26 – Town centre first assessment

Policy 26c needs strengthening by stating that community, education, health and social facilities will be easily accessible to the communities they are intended to serve through provision for walking wheeling and cycling.

Policy 27 – Town centre living

No comments

Policy 28 – Historic assets and places

No comments

Policy 29 – Urban edges and greenbelt

No comments

Policy 30 – Vacant and derelict land and empty buildings

We suggest referencing the increasing focus on repurposing vacant and derelict land and the resources that have been developed to achieve it[39] as well as the Scottish Government's Vacant and Derelict Land Investment Programme.[40] We also suggest stating that transforming vacant and derelict land to green use is a legitimate consideration (see comments on Policy 16).

Policy 31 – Rural places

No comments

Policy 32 – Natural places

We suggest changing the wording in Policy 32h so that the precautionary principle is applied to all landscape and natural heritage assets, not just those of nationally or internationally recognised significance.

Policy 33 – Peat and carbon rich soils

No comments

Policy 34 – Trees, woodland and forestry

No comments

Policy 35 – Coasts

No comments

Glossary

We recommend adding these terms and explanations to the glossary: discrimination, diversity, eliminating discrimination, equalities, fostering good relations, human rights. We also recommending adding the following terms and explanations: community wealth building, 20 minute neighbourhood, wellbeing economy.

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