

# Health and Social Care Alliance Scotland (the ALLIANCE)

## Response to Draft National Planning Framework 4 (NPF4) Consultation

31 March 2022

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### Introduction

The Health and Social Care Alliance Scotland (the ALLIANCE) welcomes the opportunity to respond to the consultation on the draft National Planning Framework 4 (NPF4). One of the ALLIANCE's core aims is to "support transformational change, towards approaches that work with individual and community assets, helping people to stay well, supporting human rights, self management, co-production and independent living." This response focuses specifically on those components most relevant to that aim.

The places that people live, work and socialise in and spaces they move through play a significant role in wellbeing. When poorly planned or designed they can act as a barrier to realising human rights, including the right to independent living. As part of our work in this area, the ALLIANCE's Health and Social Care Academy programme (the Academy)<sup>1</sup> has recently been exploring the concept of 20-minute neighbourhoods, including via an event series held throughout 2021. The series provided the opportunity to consider how neighbourhoods can be inclusive, accessible, and transformational for everyone in the community, with a focus on disabled people, people living with a long term health conditions and unpaid carers. The final event report from this series was published in March 2022, and this response draws heavily from it<sup>2</sup>.

### Policy 1: Plan-led approach to sustainable development

#### 23. Do you agree with this policy approach?

Yes. Aligning development and planning with already existing policies and ambitions will help to ensure that it works alongside other areas of governance in a consistent, coherent manner. From the national outcomes<sup>3</sup>, the ALLIANCE would consider those relating to communities, environment, health and human rights to be of particular relevance to our aims. Further specific integration of human rights (policy 4) alongside health and wellbeing (policy 14) within NPF4 itself are welcome.

In some respects, this may represent a new way of approaching planning, that looks beyond traditional measures such as scale, location and purpose. Taking a more holistic approach that considers liveability, human rights and health on an equal basis with other considerations is a positive reframing of Scotland's approach to planning, and one that puts impacts on people at the centre of planning.

## **Policy 2: Climate Emergency**

### **24. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?**

Yes. Explicit requirements to take account of the climate emergency, minimise emissions, and ensure adaptability will have a positive impact. The ALLIANCE believe it is important to consider and understand the climate impacts of all sectors of society, not simply those most obvious, such as transport and energy.

In an Academy event series on climate and social care<sup>4</sup>, it was identified that sustainable climate action will need to be underpinned by a cross-sectoral, joined up and interconnected approach. The series highlighted the importance of heat efficiency in care homes, which, was noted as both vital for the health and wellbeing of residents, and for meeting climate targets. In addition, the need for many social care staff to travel as part of their job was highlighted as adding to transport emissions. Overall planning frameworks should carefully consider how planning can enable essential services such as social care to be delivered within communities, and with sustainable, accessible transport when that is required.

## **Policy 4: Human rights and equality**

### **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?**

The ALLIANCE welcome the explicit commitment to including human rights and equality in the planning framework given in 4a. We do not agree that 4b goes far enough to truly embed human rights and equality in the planning process. Whilst this policy would require planning authorities to be mindful of human rights and equalities, it doesn't attach any specific duties beyond those relating to "early, collaborative, meaningful and proportionate" consultation.

This aims of this policy could be furthered by including a responsibility to conduct appropriate equality impact assessments on planning proposals. It is important that proposals relating to use of public space, for example public transport, active travel, greenspaces, or on-street dining, take specific and direct account of the accessibility needs of a range of groups including disabled people, people living with long term conditions, and unpaid carers.

These groups should be involved from the outset of decision-making processes rather than retrospectively. Meaningful engagement should move beyond consultation and instead into meaningful co-production, with disabled people actively involved in the entire design process. This will require evidence of change being implemented and actioned and an effective feedback loop allowing people understand how their views have influenced decision making.

Access panels are an existing mechanism which ensure that disabled people are represented at a local level throughout Scotland. Panels can provide feedback on new proposals during planning stages and are committed to improving access and equality in its widest form.

“Planners find surprising things they’d never have thought about when they actually consult with disabled people.”

Through the ALLIANCE’s work on 20-minute neighbourhoods, we heard repeated concerns about the lack of consideration given to disabled people, in particular people with visual impairments. These arose from both long-term and short-term planning decisions. Issues with longer-term planning included poor pavement infrastructure, lack of places to rest, and inaccessible railway stations. Shorter-term issues particularly arose from the COVID-19 pandemic and the sudden increase in street furniture, which made navigating public spaces harder for many disabled people.

We would also like to see this policy being more clearly threaded throughout the entire framework. There are relatively limited specific references to disabled people and accessibility of places through the document. If planning is to truly embed human rights and equality in the decision-making process, it needs to be explicit as to what kind of issues need to be taken into account so that planning contributes to realising the human right to full, equal and active participation in society.

## **Policy 6: Design, quality and place**

### **28. Do you agree that this policy will enable the planning system to promote design, quality and place?**

Yes. The inclusion of defined design principles will give those involved in planning a clear basis on which to assess the quality of proposals. In line with our answer to question 26, we welcome that this is a part of the framework which does provide some specific examples, particularly within quality 3, “Well connected and easy to move around”, which calls for “step free transitions between public and private spaces” and “simple transitions from one form of transport to another.”

## **Policy 7: Local living**

### **29. Do you agree that this policy sufficiently addresses the need to support local living?**

The ALLIANCE agree with the broad ambition of developing living places according to the 20-minute neighbourhood principle. The Academy’s 20-minute neighbourhoods series heard that the principle would be difficult to realise in every community across Scotland, and that it might be better suited to an urban context than in rural areas. “Community” was felt to be more fluid and nuanced than a rigid 20-minute basis, and that it was possible to think about delivering services locally within communities more broadly.

There is welcome recognition in the consultation document itself that the applicability of 20-minute neighbourhoods would vary across the country, and in rural areas may not be achievable. This recognition is helpful, and it may be worth considering whether the policy can be amended slightly to make clear that the principles of 20-minute neighbourhoods can indeed be applied in rural areas without strictly limiting to that timescale.

Participants in the event series noted that where 20-minute neighbourhoods were established and worked well, they would still need to be well-connected to other areas. Planning should encourage 20-minute neighbourhoods as a means of improving local services, whilst still ensuring people meaningfully have the option and choice to travel outside their community when necessary or desired.

One note of concern about existing frameworks was the development of local hubs. Some attendees felt that in rural settings these had led to the removal of local services from communities, which combined with poor transport links would only deepen inequalities. In striking the balance between the principles of 20-minute neighbourhoods in urban areas and adapting those more flexibly to rural areas, it will be important not to risk replicating existing issues with the hub approach. Each local community is different, as a result open dialogue is required to ensure that planning decisions take account the needs of individual communities.

## **Policy 9: Quality homes**

### **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?**

Yes. We particularly welcome that 9f) calls for an “equalities led approach to addressing identified gaps in provision” which would include wheelchair accessible homes, homes for older people, and a range of home sizes. In addition to being a positive proposal in and of itself, housing diversity is one means of delivering on the aspiration of 20-minute neighbourhoods, offering people the ability to live within their local communities regardless of their own circumstances.

Housing was one of the focus topics within the Academy’s 20-minute neighbourhood series, with participants agreeing that diverse housing options were necessary to meet the needs of different groups. Adaptable housing was highlighted as key for supporting disabled people and an ageing population. Affordability of housing was another key theme that emerged from the event series, with need for greater provision of social housing identified.

Ensuring that the planning framework doesn’t simply encourage but in fact requires this sort of diverse provision is essential. Planning for new build developments should proactively take account of accessible housing.

“Working with planning rules to ensure accessible housing is part of the requirement of new builds, and where even if it doesn’t include adaptations itself, it is easy and affordable to be adapted. Issue of public good vs profit in housing design”

One participant shared their feeling that even where developers had committed to a certain percentage of wheelchair accessible housing, they weren't delivering on that, emphasising that there needs to be a way of holding developers to account. For example, delivering a percentage of accessible housing for new developments should be made a legal requirement.

## **Policy 10: Sustainable Transport**

### **32. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?**

Yes. The requirements to take into account sustainable travel hierarchies, provide segregated links for walking, wheeling and cycling, support active travel infrastructure and provide electric vehicle charging points, amongst others, will help achieve this policy aim. The ALLIANCE welcomes the explicit requirement that new developments should have direct access to transport networks, including public transport. Public transport was felt by participants in the Academy's 20-minute neighbourhood events to be fragmented, and they wanted to see it considered more fully right from the earliest stages of planning.

Whilst reducing car kilometres is essential to meeting Scotland's climate targets, and reducing car use overall can help to create more liveable spaces, it is important to remember that cars will always be a vital mobility aid for many people. At one of the Academy's 20-minute neighbourhood events, the speaker from the Mobility and Access Committee for Scotland (MACS) noted that there are over 60,000 motability cars and 200,000 blue badges in Scotland. This needs to be accounted for in planning, but it was felt to be overlooked in sustainable travel plans thus far.

It may be helpful to amend the framework so that appropriate provision of disabled parking is viewed as a separate issue from provision of general parking. Essential public services and any large developments should still provide enough parking for disabled people to be able to access the same opportunities as everyone else.

## **Policy 12: Blue and green infrastructure, play and sport**

### **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?**

Yes. The ALLIANCE welcomes 12h) which calls for "ensuring that the needs of all potential users [of green and blue spaces] are met". Access to greenspace has positive impacts on physical, social and mental wellbeing. The ALLIANCE recently published a research report "Growing the Impact of Nature"<sup>5</sup> that explored key issues underpinning the delivery of nature based health activities in Scotland. Research found that nature based health activities are viewed as being potentially transformative for people, "lighting" or "sparking" something in them and having a

positive impact on both people's mental and physical health. The report also cited the positive mental health benefits of including; reduced anxiety, reduced risk of crises, self confidence and supporting social connections.

At the Academy's 20-minute neighbourhood events, participants stated they felt the importance of greenspaces hadn't been enough of a focus of discussion. It was noted that COVID-19 had highlighted disparities in use and access to greenspaces. Whilst some people made significantly more use of greenspaces than others, including older people and those living in more deprived areas, many did not have access at all. The quality of greenspace was felt to matter as well, such that even when people had a greenspace nearby, it often wasn't of high quality and may not have been accessible.

In improving access to existing and developing new greenspaces, quality and access should therefore be considered closely. At one event, a participant shared an anecdote about having been unable to access her local park during lockdown, as her powered wheelchair didn't fit through the gate. She raised this issue with the local council who acted swiftly, but unfortunately without fully assessing what adaptations would have helped, and the replacement gate was still inaccessible. Communities, and especially disabled people and others with specific access needs, should be fully involved in the design and development of greenspaces.

### **Policies 14 and 15: Health, wellbeing and safety**

#### **36. Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?**

Yes. Providing specific grounds to reject applications on the basis of negative health impacts is welcome. It will better equip planning authorities to support public health and wellbeing. The ALLIANCE welcomes that the framework states in 14a) that health and social care "should be a key consideration" in local development plans, and that plans should "seek to tackle health inequalities". Social care is essential to making sure disabled people, people with long term conditions, and unpaid carers can fully realise their rights to independent living and participation in society so it is right that development should give due weight to health and social care provision.

Policy 14 may benefit from specifying some aspects that should be considered to create "safe places" in the sense of individual and community perception, rather than the hazard-aware sense of policy 15. At the Academy's 20-minute neighbourhood session on greenspaces, perceptions of safety were one of the key issues highlighted. Some issues relating to perceived safety included lighting, openness of spaces, and whether people felt isolated when using them. Attitudinal perceptions in terms of public spaces being welcoming to one age group but not others were also identified, though these may be more difficult to address via the planning framework than physical infrastructure related issues are.

In the ALLIANCE 'Growing impact of nature' report it was acknowledged that there is a great variety of activities delivered across Scotland, particularly by the Third Sector. However, there are still geographical gaps in provision and access to activities can often be a matter of happenstance.

## About the ALLIANCE

The Health and Social Care Alliance Scotland (the ALLIANCE) is the national third sector intermediary for a range of health and social care organisations. We have a growing membership of over 3,000 national and local third sector organisations, associates in the statutory and private sectors, disabled people, people living with long term conditions and unpaid carers. Many NHS Boards, Health and Social Care Partnerships, Medical Practices, Third Sector Interfaces, Libraries and Access Panels are also members.

Our vision is for a Scotland where people of all ages who are disabled or living with long term conditions, and unpaid carers, have a strong voice and enjoy their right to live well, as equal and active citizens, free from discrimination, with support and services that put them at the centre.

The ALLIANCE has three core aims; we seek to:

- Ensure people are at the centre, that their voices, expertise and rights drive policy and sit at the heart of design, delivery and improvement of support and services.
- Support transformational change, towards approaches that work with individual and community assets, helping people to stay well, supporting human rights, self management, co-production and independent living.
- Champion and support the third sector as a vital strategic and delivery partner and foster better cross-sector understanding and partnership.

## Contact

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<sup>1</sup> [Five Provocations for the Future of Health and Social Care - People and Networks \(alliance-scotland.org.uk\)](https://www.alliance-scotland.org.uk)

<sup>2</sup> The ALLIANCE and Disability Equality Scotland, “Exploring Scotland’s 20-minute neighbourhoods series event report” (March 2022), available at: <https://www.alliance-scotland.org.uk/blog/resources/exploring-scotlands-20-minute-neighbourhoods-series-event-report/>

<sup>3</sup> Scottish Government, “National Outcomes”, available at: <https://nationalperformance.gov.scot/national-outcomes>

<sup>4</sup> The ALLIANCE and Scottish Care, “Climate action and the social care collective – roundtable series report” (December 2021), available at: <https://www.alliance-scotland.org.uk/blog/resources/climate-action-and-the-social-care-collective-roundtable-series-report/>

<sup>5</sup> The ALLIANCE, “Growing the impact of nature: Key findings” (February 2022), available at: <https://www.alliance-scotland.org.uk/blog/resources/growing-the-impact-of-nature-key-findings/>