



Scottish Women's Convention response to the Scottish Government's:

Draft National Planning Framework 4

March 2022

Premise

The fourth National Planning Framework (NPF4) will, when adopted, set out the Scottish Government's priorities and policies for the planning system up to 2045 and how our approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045. NPF4 differs from previous NPFs in two ways. It incorporates Scottish Planning Policy and the NPF into a single document and will form a part of the statutory development plan.

This consultation seeks views on the draft NPF4 as well as the integrated impact assessments associated with it which look at how the plans will impact different groups and protected characteristics across Scotland.

The Scottish Women's Convention (SWC)

The Scottish Women's Convention (SWC) is funded to engage with women throughout Scotland in order that their views might influence public policy. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at both a Scottish and UK level.

The SWC engages with women using a range of methods, including roadshow events, thematic conferences, and regional contact groups. This submission provides the views of women, reflecting their opinions and experiences in key areas relevant to women's equality.

The SWC is currently engaging with women through digital roadshows, online surveys, asking women to comment by email, and by telephoning those who want to talk. We are also using our wide network to ask women to collate views in their local communities and forward these to us on a regular basis. We are continuing to review innovative ways of engaging with women throughout Scotland using whichever medium is appropriate to them.

Questions - Part 1 – A National Spatial Strategy for Scotland 2045

1. Sustainable places. Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment. 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?

- Women are concerned about the affordability of greener options.
 - “I think that’s where the government needs to step up, in making things affordable. They need to make it the default, so people aren’t having to actively try to be more green.”
 - “My son is having an air source heat pump installed, and it’s actually going to cost more than my income for a year. Now how many people could afford to do that? These things are phenomenally expensive.”
 - “I’m concerned about the justice of everybody being able to go forward and not be deprived because it’s actually quite costly to individually go green and having access to the alternatives.”
 - “When solar panels were first invented, they were so expensive they could only go on satellites. Whereas now, quite a few housing associations have them on every house that they own. So it is a case of how we could manipulate the market to make sure that green also means inexpensive.”
- They are also concerned about the strategies for trialling new greener options.
 - “There have been a few kickbacks in social housing. Why should all the experimentation on what might work, with heating systems or fabric first, be done on the people who can least afford for something to go wrong? A lot of it is still quite experimental, it’s very expensive because it’s first time, so why should the people who pay rents who have low incomes, why are they getting hit with having to be the people who basically pilot this? It’s unfair. They don’t have a say in what you’re going to do to their house.”
- Women shared that the lockdown made them more grateful for green spaces and want to see more emphasis on these spaces, especially in urban areas.
 - “Being at home during the lockdown, I did really discover my local park... it was like a wonderful revelation to find a space that was green. I felt so bad for people who don’t have access to that as it makes such a huge difference being able to appreciate nature. To lose that would be awful.”
 - “Having access to the green environment is really important and there isn’t that accessibility for everyone. I’m sure one step in countering climate change can be encouraging creating green spaces among more built up communities.”
 - “We are lucky in Scotland that we do have a lot of green space round about us. We were going out walking and taking black bags with us because we were seeing how it was damaging the environment.”

2. Liveable places. Our future places, homes and neighbourhoods will be better, healthier, and more vibrant places to live. 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?

Women are angry about the closure of and cuts to local services.

- Cuts disproportionately affect more deprived areas. Many women who can least afford it have to travel long distances to access support services such as Citizens Advice, Job Centres, libraries or even GP practices and supermarkets.
- Failures in terms of forward planning (e.g. when large housing developments are built but the necessary increase in school places does not happen to meet demand – it often then falls to women to take the longer school runs, or deal with the added stress of organising children earlier in the morning etc.)

Disabled women have raised concerns about transport and infrastructure.

- While cycle lanes are welcome as a means of encouraging active travel, the way they have been implemented sometimes leaves disabled women unable to access buses or blind women are at risk of injury crossing the road because of the way the cycle lane intersects the pavement.
- Uneven pavements can be very dangerous for people using wheelchairs or walking sticks, and cars parked on pavements can greatly limit mobility, meaning some disabled women are unable to leave their homes completely.

4. Distinctive places. Our future places will be distinctive, safe, and pleasant, easy to move around, welcoming, nature-positive and resource efficient. 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?

- There needs to be more acknowledgement of the ways in which women use public space differently to men.
 - “In Finland, they stopped putting money into roads and started putting money into pavements... Women would use pavements more, and they tend to walk places, the shops or taking the kids to school, rather than taking the car. They saved millions with this approach, so we need to think about how women travel in their communities.”
 - “Most women tend to walk places, going the shops or taking the kids to school, rather than taking the car.”
 - “A lot of the housing schemes they’re building now are just houses. If we were building more communities where there were shops, schools and amenities, there would not be a need for so much transport.”
- Ensuring that women feel safe in public spaces is especially important.
 - “I didn’t have a bike until lockdown... I would have been too afraid to cycle into the city centre with all that traffic before the lockdown, so it was nice to be able to access those spaces.”

- “Cycling infrastructure like cycle lanes means more women are more likely to cycle whereas more men will do it anyway. This opens up our urban areas to women.”
- “Having lights in spaces such as walkways and parks would make it feel safer to access these areas especially at night or in the winter months. These things need to be looked at when planning spaces and pathways”

8. North and west coastal innovation. Do you agree with this summary of challenges and opportunities for this action area?

- Women were very aware of the changes in wildlife in these areas and want to see more to address this.
 - “I live on the north coast, and I can see from the environment that there are so many fewer seabirds and there are fewer whales and dolphins going past, definitely.”
 - “Our ecosystem in Scotland is going to be affected, no doubt about it. Things are already moving up from the south and acclimatising right up in the north of Scotland, or just die out completely. That just seems inevitable, it’s already happening.”
 - “We’re getting more foreign plants and insects, but the temperatures are allowing that to happen. It’s just happening so quickly that it might not be possible for the animals that live in Scotland to adapt.”

12. North East transition. Do you agree with this summary of challenges and opportunities for this action area?

Yes. The women we spoke to agreed that there will be challenges for the oil and energy industries in this area.

- “If we’re going to move away from oil to renewables, the infrastructure has to be in place because people are frightened of not having a job. They’re frightened for their own job and don’t think beyond that about the bigger picture, totally understandably.”
- “In Scotland, a lot of people just don’t trust that their job’s not just going to be taken away from them like it was in the past when areas of shipbuilding or car manufacturing just went with no thought for the people losing their jobs. People have been used to getting let down.”

13. North East transition. What are your views on these strategic actions for this action area?

- “It needs to be explained exactly how that will happen, not just saying it will happen, as very often politicians do that. Even if it’s just in skeleton form, but they need to provide some more detail, so people feel more secure in the knowledge that someone’s really thought about it.”

Questions - Part 3 – National Planning Policy

22. 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. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Yes. The women we have spoken to are very concerned about the climate and nature crises and want to see them taken seriously by the Scottish Government in all their processes.

- “I’m a bit scared, I’m a lot scared actually... they reckon we’ve got about ten years left before the damage is irreparable. We really need to be looking at the next five years, not leaving it all until nine years and three hundred and sixty something days. We need to get things going now.”
- “I do see some positive things in what the Scottish Government is doing, but we do need to do more, a lot more.”

24. Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

- Women raised the need for more planning in relation to food scarcity, especially in urban areas.
 - “During COVID, the thing people realised about food is that you can’t always rely on the supermarkets, especially at the moment. So people were turning to farmers markets because they were thinking about their food security. I know not everybody can afford to do that, but there was this increased awareness that that is a more viable thing to do. Farmers markets were doing veg boxes for more deprived areas. It’s just about taking some sort of local action and trying to see if that could be elevated to a higher level for everybody.”
 - “I actually think food security is going to be a really big problem in about ten years’ time. Just even thinking about the horse meat scandal.”
 - “In time there are going to be food shortages, but no one is really talking about that properly.”
 - “There are huge issues that all need to work together to make the necessary changes to agricultural policy.”
- They also emphasised the need for collaborative work and more joined up thinking in relation to tackling the climate emergency.
 - “I think trying to work more collaboratively and putting all those expertise together to tackle the climate emergency together, and reminding people that everybody has a role to play no matter what sector they’re in. That’s what we need.”
- There needs to be better planning around recycling and how the use of space is considered.
 - “I can only talk for my own local authority, but the cuts they’re making all the time are always hitting recycling, refuse collection, garden and parks provision, they’re all being axed.”

- “You go out and there’s so many bins everywhere and people are complaining. I’d rather have [the recycling] bin and not having the aesthetics just to make sure there’s more effort going into people taking action, but not everyone would agree, and it needs to be simpler.”
- “There are so many holiday houses, and they don’t have recycling bins. The visitors want to use them and do the recycling, but the people who own the holiday houses don’t care and don’t supply it... We were told that it is actually illegal for businesses not to do their recycling. Airbnb’s are businesses, aren’t they? Holiday houses are businesses. It’s just so frustrating.”
- “There was a charity that would upcycle furniture and furnish homes for people who had become homeless or were having to flee something. At the recycling centre, there were two containers so people could take stuff and put it in the container for a dedicated charity and all the Highland Council sites had one of these containers. But then they made the decision to take them away, you won’t believe this, because the charities were taking business away from the council for the bulk uplift charges. You couldn’t make it up. It ended up with the charities folding, it’s just terrible.”
- The gendered impacts of climate change also need to be given more weight.
 - There needs to be better support and opportunities to get women, especially young women, into green jobs.
 - “As people are struggling to farm efficiently because of the climate crisis, or as people are having to move home because of climate change, often the women are the most marginalised in these situations, having to go back to working for their families rather than going to school, or being put at risk because they’re moving around.”
 - Young women have been shown to be the most deeply affected by eco-anxiety and are limiting their own opportunities out of lack of optimism for their future.
 - “When I think about climate change, I think about how women around the world are one of the biggest forces for change. We are some of the most resilient groups of people, but we are also at the front of the climate crisis.”
 - “Women need to contribute to this agenda. We are the educators and it’s really important that we make the change.”
 - “The climate crisis affects the poor and the socially marginalised more than it affects anyone else, and the WHO tells us 70% of the world’s poor are women so it’s really important that we grow our voice.”

27. Policy 5: Community wealth building Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Community weather building should be a crucial part of planning.

- There needs to be more proactive engagement and collaboration with communities to understand and address their needs – “[The Scottish Government] has taken so much information from us, but then they lose it or abandon it. My community is tired of doing consultations and it is time we held the Government accountable... There’s

no point asking somebody something if you're not going to take action about it. All the women are fed up."

- An intersectional approach needs to be taken to identify the barriers faced in different communities as one size will not fit all.

32. Policy 10: Sustainable transport. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

More investment is needed in public transport, and the different ways women use public transport compared to men need to be recognised.

- "In Glasgow, we are quite lucky with trains, but more could be done with the buses. I think the push now is for hydrogen buses or even trams."
- "It is expensive if you look at a family going out, for an all-day pass for all of them it is expensive so you can understand why they would rather go out in the car. When I went to Prague, for one week it was £12 to take us on the tram, the bus and on the train, for a whole week. Say you are a family of 6, think how much it costs here. Do people have the money for that? I walk most of the time to work or to the city centre, but if I was having to drag children with me, I can understand why people go in the car."
- "I think transport should be in the public's hands. We've now got free transport for under 21s, but why not for mothers and children or fathers and children, why don't we have concessions for that? And then it could get extended on and on and on, hopefully."

35. Policy 13: Sustainable flood risk and water management. 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?

Women raised concerns about the sustainable use of water resources.

- "The really big problem is going to be water because at the moment the Government is allowing so much more sewage into the water. They're just opening the floodgates and letting more sewage into the rivers which will then go into the sea, and these decisions are being made without consultation."

36. Policies 14 and 15 – Health, wellbeing, and safety. Do you agree that this policy will ensure places support health, wellbeing, and safety, and strengthen the resilience of communities?

High-profile cases of violence against women and girls such as the murder of Sarah Everard have brought attention to the safety issues that women face in public spaces. These are real barriers that women face every day and cannot be forgotten about when they are no longer making headlines.

- "Forms of harassment serve as a reminder that these public spaces are not ours to enjoy equally. We are told this is not our domain when these things happen. We are unable to exist as full, right-bearing citizens when we live under the threat of harassment."
- "It can be taking the long way home, taking a taxi at extra cost, avoiding certain places, or even just mentally anticipating in fear when crossing the path of a group of guys."

- “What’s ultimately really sad about this is that, as women, our time and energy could be directed elsewhere. We could be spending that time and that brainpower thinking about more meaningful and fulfilling things, not calculating just how to exist out on the street.”

38. Policy 17: Sustainable tourism. 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?

- Our consultations with women in island communities have revealed that there is discontent with the way that their economy and community planning are heavily imbalanced towards tourism over local people.
 - “There’s a lack of shops for basics (no shoe shops and few clothes shops, but craft shops and cafes aplenty).”
 - “There has been a loss of community due to becoming too tourist-centred.”
 - “We are viewed in terms of our pretty landscape, and economic ‘development’ tends to be the easy option of tourism. Tourism is chipping away at our communities as more and more housing is bought and owned by non-islanders.”
 - “In our area, there is no recreational space, which erodes community cohesion as there are no opportunities for the community to gather. This impacts on attracting new families to the area, which then impacts the local school roll, which then affects the local shop, which then affects the bus services, and before you know it, you have a lifeless community with no heart.”

40. Policy 19: Green energy 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?

Women were very supportive of strategies to adopt more renewable energy.

- “What’s the difference between having a windmill or having an oil rig? You can see them both, but people don’t complain about seeing an oil rig.”
- “I may not love wind farms, but they are a necessary evil at this point.”
- “Wind farms are definitely not spoiling the landscape. We definitely need it, and we need to embrace it.”
- “I love the look of them. I love when you’re out in nature and you can see all the windmills, I don’t think that’s a problem. Other people say they hate that and it’s spoiling the environment but it’s not like when they started putting up electricity pylons everywhere and ruining everything. I think they are making an effort to make things more aesthetically pleasing nowadays, but personally I just always welcome it when I see it.”
- “My youngest grandson thinks wind turbines are phenomenal! He watches them all the time.”

41. Policy 20: Zero waste. 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?

Women climate activists that we consulted with had a range of ideas for campaigns and strategies to reduce waste:

- “In Germany and Spain, if you buy a drink in a can or a bottle, when you take it back then you get 5 or 10 cents. You don’t find litter anywhere because people come and pick them up, even out of the bushes people tidy them away. We need a thing like that.”
- “At TRNSMT they had a scheme where if you recycled your cups then you got money off your drinks, so the young people were enjoying the music, but they were also going round picking up the cups.”
- “There’s something about how we all reward ourselves with things, whether it’s clothes or books, instead of just recycling. People don’t want to be seen in the same clothes or are always wanting to go on holidays. We all want to see people and places, but it’s just not possible anymore, is it?”
- “This year I made a New Year’s resolution that I wasn’t going to buy any clothes and it’s actually just made me realise I do have enough clothes and there’s absolutely no need to buy any more. If people just started to think about how much money they would save if they just didn’t buy as much food that they chuck in the bin, and if you haven’t eaten everything at your dinner, have it for lunch the next day. I don’t know if that’s how to sell it to people; stop doing all the daft wee things because it’s ruining the environment, it’s ruining the planet and there’s no real pleasure to it, and instead you could save up for something that you really want.”

Questions - Integrated Impact Assessments

65. Society and Equalities Impact Assessment. Do you have any comments on the findings of the equalities impact assessment?

We welcome the acknowledgement that women’s mental health has been disproportionately negatively impacted by the pandemic. It is important that this is treated as a priority in upcoming planning. We have found that this problem is especially acute among older women.

- “Older women have been left to deal with it, and they’re not looking after themselves. It’s an absolute mess and it has to be addressed.”
- “I feel angry that there seems to be an assumption that because we are older (I am 54) we should be able to cope better because we have lived long enough to have been through stressful situations before. This situation has been unlike anything any of us have experienced before and there should be a recognition that everyone (regardless of past experiences) will have found the time very challenging.”
- “There are some really strong, active women who are now scared to go back out there, and it’s quite worrying that they’ve basically just been ignored. They’ve just been left behind.”
- “It’s the women who are 50+ who are the ones that have been keeping us all going, keeping us alive, and doing all the services on the frontline and care and schooling.

They've been doing a lot, they've been seeing a lot and that will have a profound effect on their mental health, and we won't really know how it has affected them until we're really out of this, by which time a lot of the funding will have already been allocated."

- "Everyone's going stir crazy and who's the first point of call? Older women. They're getting it from all angles, and they're expected to cope and get on with it. Nobody's really asking what impact that's having on their mental health."
- "There has been a big push in terms of mental health for the 18-29 age group, and I know that's a very important age group, and I know older women were consulted, but the money wasn't directed that way... I think it's a case of older women, they're very caring, nurturing people, so they would put themselves on the back pedal in order to get services for younger people."

Women we have spoken to have raised concerns about the moves towards making many services entirely online. This caused many challenges for them during the pandemic and there are worries about how this will impact them moving forward.

- "Banks and post offices have been closing down and older people are being forced to do things digitally. This loss of control and contact has a huge impact on mental health."
- "Basically, I gave up because the online process felt so foreboding and I was terrified of getting in trouble if I made a mistake."
- "You get referred round the circle back into the web and, if you don't have the digital skills, you have a problem. You're dealing with so many people you can't even reach, and it's very frustrating."
- "My GP system is all online now, and I don't know how many times I've said to them, it doesn't work. I've had other people trying to help me and the system just doesn't accept me, but they're adamant I need to do it that way... but then I'm getting frustrated and that impacts on my mental health that way."
- "You're passed from pillar to post and sometimes out of sheer frustration they just give up."

More thought also needs to be given to how we plan for changes to the way people work and how these may affect women differently.

- The move towards more flexible working following the pandemic have been beneficial to women, especially disabled women, and women with caring responsibilities for children or other relatives. However, there does need to be more consideration of the challenges.
 - We need to ensure that this is not used as means of confining women to the home, and that women who take up the offer of home are given the same opportunities to progress as their co-workers.
 - Planning needs to be put in place to ensure the broader mental and physical wellbeing of those working from home, and that facilities exist in the community to prevent isolation.
 - Safeguards and proper health and safety assessments need to be in place for women working from home, especially relating to domestic abuse.

- Homeworking needs to be properly funded to ensure women have all the correct equipment they need and are reimbursed for any work-related costs they incur.
- Workplace parking costs and the proposed tax may be detrimental to women.
 - They may have to park in less secure facilities or have to park further away from their place of work and walk-through areas where they do not feel safe.
 - There needs to be consideration for the fact that women with caring responsibilities (for children or other family members) may need to leave urgently and therefore rely on having access to a car for work.

69. Society and Equalities Impact Assessment. Do you have any comments on the islands impact assessment?

Having consulted with women about the Islands Bond, we believe that there needs to be more proactive engagement with island communities about planning.

- “What is even more important than consulting though is listening to people. That doesn't always happen with so-called consultations.”
- “We islanders are fed up of having unrealistic policies foisted upon us that we then have to take the time and energy to explain why they won't work.”
- “Think very very carefully about what you are doing. What you decide in the Central Belt will then affects us who live here.”

Women noted issues around housing:

- “As well as homes and opportunities for young families, I see no provision made for older people wishing to downsize from too-large homes into smaller, more convenient houses in less isolated places. As it stands, I have to run a car as there is no public transport anywhere near here. I am in reasonable health, but I will inevitably become less able as time goes on.”
- “There are not enough one-bedroom houses being built as starter homes.”
- “Housing prices are distorted by Airbnb.”
- “Youngsters starting out in life unable to compete in the housing market against the numbers of those looking to move here on a whim or retire here.”

There are also knock-on effects on local services and transport:

- “Lack of affordable housing is the number one challenge and this impacts on everything else, from sustainability of the local economy to provision of essential services to the viability of school rolls.”
- “Poor transport links due to rural location means you need a car (or even a car for every working adult) which is more expensive.”
- “There is the added cost of travel off the island, for leisure, business or health.”
- “The cost of flights is too high, and the ferry service is not island-focussed in any way.”

Women have particularly noted the need for better planning around childcare provision:

- “There could be central community hubs with crèche options and working spaces so parents could be working nearby their children rather than facing a 20+ mile commute to the central town to work. This could then help parents access work whilst also doing

the really important things like being involved in community activities or school and pre-school activities.”

- “Childcare is still an issue as, in the majority of families, it is the mother who doesn't work, or takes low paid work to fit around their family. On Mull, there is no nursery and only one registered childminder, so many mothers juggle work with informal childcare arrangements which aren't sustainable.”

They also raised concerns about the planning around stable employment in island communities, and especially the gendered nature of work:

- “It is hard earning enough money all year round to remain here.”
- “Wages seem lower than other parts of the UK despite the cost of living being substantially higher than most of the UK.”
- “Often there are reduced employment opportunities for higher-paid, skilled jobs.”
- Many of the higher-level strategic roles have been centralised to the mainland. There is a distinct gendered job creation approach. Typically male industries like construction, ports and the renewable potential are the focus of activities.”
- “Women are not given the same opportunities to enter crofting.”

Conclusion

The SWC is grateful for the opportunity to respond to the Scottish Government's consultation on the Draft National Planning Framework 4. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to this topic and its effects on women's equality.

For further information, please contact

The Scottish Women's Convention

Email – info@scottishwomensconvention.org

Telephone – 0141 339 4797

www.scottishwomensconvention.org

The Scottish Women's Convention engages with women using numerous communication channels including Roadshow events, Thematic Conferences and regional contact groups. This submission paper provides the views of women and reflects their opinions and experiences in a number of key areas relevant to women's equality.

Scottish Women's Convention is a charitable company limited by guarantee. Registered in Scotland No. SC0327308. Registered office 2nd Floor, The Albany Centre, 44 Ashley Street Glasgow G3 6DS.

The Scottish Women's Convention is a Charity registered in Scotland No. SC039852.