



RTPI

mediation of space · making of place

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Department for Transport
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Dear Sir or Madam

**ROYAL TOWN PLANNING INSTITUTE RESPONSE TO DFT'S CONSULTATION ON:
PLANNING AND THE STRATEGIC ROAD NETWORK**

1. I am pleased to submit the Royal Town Planning Institute (RTPI)'s response to the DfT's consultation on planning and the strategic road network. Our response is solely concerned with the Highways Agency's role in the preparation of **Regional Spatial Strategies** and Local Development Frameworks. We have no views to express with regard to the way that the Agency deals with planning applications or about Section 278 Agreements.
2. Our response is made in two parts:
 - **Part 1** considers the wider issues of policy relating to spatial planning and the strategic road network.
 - **Part 2** answers Questions 1 and 2 of the consultation's questions about Planning and the Strategic Road Network.

PART 1: POLICY RESPONSE

3. The RTPI is a membership organisation representing over 19,000 town planners. The RTPI exists to advance the science and art of town planning for the benefit of the public. It is strongly committed to a new vision for planning, which we consider should be spatial, sustainable, integrative and inclusive.
4. The RTPI has a long involvement in considering optimum ways of planning for infrastructure investment and delivery. We believe that the development of more detailed sustainable infrastructure plans at regional and sub-regional levels is essential to national long-term economic competitiveness and to the objectives of sustainable development.
5. At a time when planning decision making processes relating to infrastructure have fallen under the scrutiny of the likes of Kate Barker and Sir Rod Eddington, the Institute is very pleased that the Highways Agency has been reexamining the contribution that it can make to spatial planning activities. However we would like to see the importance of spatial planning and the contribution that the Highways Agency can make to it spelt out with more detail than the Circular has sought to do.
6. For example, in paragraphs 6 to 8, the Circular sets out a useful, but in our view, unduly brief policy background. The 2004 Planning and Compulsory Purchase Act has introduced a planning system whose scope and purpose have changed fundamentally from what has gone before. Through the introduction of spatial planning the Government has signaled its determination to achieve more joined-up development processes but the Circular barely hints at the significance of this. The RTPI would therefore like the Circular to explain more clearly what it is that spatial planning is seeking to achieve. This would help those to whom this Circular is addressed to understand better why they should participate as partners in spatial planning activities.
7. One way to do this might be for the Circular to refer to the advice contained in DCLG's Planning Policy Statements. For example, PPS 1 explains that:

Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they can function. That will include policies which can impact on land use, for example by influencing the demands on or needs for development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.
8. The importance to the economy and our communities of the strategic road network is enormous. It provides accessibility to markets and employment opportunities, while

growing levels of congestion are becoming an increasing constraint to future growth. For these reasons, the network, its capacity and the way that it is operated is becoming one of the most critical determinants of what regions and local authorities can achieve over a medium term period in terms of economic development and regeneration.

9. The Circular needs to say this. It should emphasise that spatial planning involves exploring the implications of these issues in the round and that the RSSs and LDFs are provided for by the 2004 Act are designed to do this.

PART 2: RESPONSES TO QUESTIONS

Question 1. Does the proposed Circular explain clearly how the HA will engage with the planning system? If not, how could it be improved? Please identify as clearly as possible what further information should be included and explain your reasoning.

10. While para 13 of the Circular confirms that the Agency will 'work with', 'help to develop' and 'provide advice' on RSS development, it is difficult to know what this would mean in practice.
11. We should therefore like the Circular to commit the Highways Agency to full and close collaboration with spatial planning activities in order to achieve more joined-up plan making and sustainable development throughout the country.
12. PPS 1's aspirations are ambitious and demand a fundamental culture change for all sectors of the development industry. In our view this means that a clear message is required that participation in spatial planning activities must be integral to other individual strategic planning activities.
13. Ideally, although we acknowledge this is beyond the scope of the Circular, such a culture change should be reflected by confirming the significance of the strategic road network in promoting economic growth and regeneration objectives in the mission statement on the Highways Agency's website. In the meantime we should like the Circular to reflect the importance of engaging actively in spatial planning activities by requiring the Highways Agency to summarise its progress in its annual reports, perhaps through the development and reporting of relevant KPIs.

Question 2. Is the proposed early involvement of the Agency in the development of Regional Spatial Strategies and Local Development Frameworks appropriate and achievable? If not, how should the approach set out in the proposed Circular be amended?

14. In our view it is absolutely essential that the Agency must participate from the outset as an active partner in the preparation of RSSs and LDFs. The strategic road network is frequently one of the most critical determinants of what regions and local authorities can achieve in terms of economic development and regeneration. So important is this that the HA must not allow itself to slip into the role of statutory consultee in spatial planmaking – it must be an active partner.
15. The Institute is unclear why such a partnership role might not be achievable, but we believe that if problems do emerge that make it difficult for or prevent the HA participating in this way they must be resolved urgently.
16. If you require any further information about this response, please contact Will French, Policy Officer on 020 7929 9466.

Yours faithfully


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Rynd Smith
Head of Policy & Practice