

THE ROYAL TOWN PLANNING INSTITUTE

Scotland's Transport Future: draft guidance on Regional Transport Strategies

A response to the Scottish Executive's Consultative Draft Guidance

December 2005

Introduction

1. The preparation of regional transport strategies by 31 March 2007 will be the first and one of the most important tasks of the new Regional Transport Partnerships established under the Transport (Scotland) Act 2005. The draft statutory guidance, which is the subject of this consultation will play a critical role in providing the basis for these strategies and hence in achieving an effective framework for transport policy and implementation in Scotland.

General Comments

2. The Royal Town Planning Institute (RTPI) welcomes the opportunity to respond to this consultation as it views regional transport strategies as being fundamental mechanisms for ensuring the integration of land use and transport planning in the future. The RTPI is the UK body chartered to represent the planning profession and offers these comments on the draft guidance from the point of view of a diverse and policy neutral professional body committed to supporting devolved government in Scotland. The Institute has 1800 members in Scotland working across all sectors of central government, local government, government agencies, the voluntary sector, private consultancy, the development industry and academia. Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.
3. The Institute wholly supports the aim to bring radical improvement to the processes of delivering transport infrastructure projects and more coherent management of transport networks as set out in the new transport legislation. We consider that it is essential that these proposals are clearly related not only to transport planning mechanisms in the narrow sense but also to spatial planning mechanisms within which proper recognition is given to the fact that all travel patterns emanate from land use patterns. Our detailed comments on this relationship and on how better integration might be achieved are set out in the following paragraphs under the headings used in the guidance. In summary we would encourage:
 - more meaningful cross-referencing to spatial planning systems and plans within the guidance;
 - clarification of the relationship between transport and land use planning as a core purpose of the guidance;
 - inclusion of the National Planning Framework under related strategies (paragraph 15 and Annex E);

- the closest possible coincidence between the geographical areas selected for transport and for development planning in relation to city regions;
 - production of joint guidance on processes for consultation and integration for land use planning and transportation at the regional level; and
 - closer working relations between transportation and land use planners.
4. The Institute notes that the consultation was distributed directly to Local Authority Chief Executives and Heads of Transportation or equivalent. We would recommend that in view of the close relationships between transport and land use planning, consultations on transport strategies should in addition be forwarded directly to Heads of Planning.

Section 1: Introduction and Purpose of the guidance

5. The need for close integration between transport and development planning is widely recognised but continues to raise issues in practice. Both systems support the Scottish Executive's wider objectives on economic development, social justice and sustainable development. They share key objectives in supporting sustainable communities for example in ensuring that transport infrastructure is provided in tandem with land development, not left waiting for funding allocation. The requirement under the Transport (Scotland) Act 2005 for local authorities to exercise their functions in accordance with the RTS in development planning and management underlines this close connection and needs to be supported with guidance on how to achieve full and effective integration in practice at all levels. The Institute considers that this should be a reciprocal arrangement in view of the proposals in '*Modernising the Planning System*' to include RTSs under designated statutory consultees for development planning. The intention being that such bodies provide, at an early stage, information critical to the delivery of the proposals within the development plan and ensure better co-ordination of spending and policy decisions.
6. Whilst the Institute supports the need for the RTP to focus on some issues at the expense of other, we consider that the relationship between development planning and transportation is crucial and urge that the clarification of this relationship should be a core purpose of this guidance. In this respect paragraph 7 might be expanded to include the task of outlining the linkages between the regional strategies and related planning documents and between related transport and planning systems. Important links need to be made at all levels and stages in these two planning processes and it will be important to recognise where advantages can be gained from joint working, with clear identification of the points in the processes where consultation should take place on matters such as planning objectives, information sharing, alternative policies, strategic environmental assessment, monitoring and public consultation etc.

Section 2: Guidance

A: Purpose of the regional transport strategy

7. The new national and regional strategies and the establishment of special bodies provide us with new opportunities to apply principles of integration at all scales within the transport and land use planning system. It will be important to ensure that the National Transport Strategy and Regional Transport Strategies reflect planning aspirations and are developed in conjunction with spatial development proposals. Only through joint working will it be possible to realise the opportunities of moving a little closer to the integration of planning and transport. It will therefore be important for the new regional transport strategies to reflect the vision and objectives of related spatial strategies and plans within its area and to achieve horizontal as well as vertical integration.
8. Issues for policy integration need to be addressed particularly within city regions and there are a number of difficulties that will need to be addressed relating to organisational boundaries and timescales of plan preparation. The current proposals for regional plans for both planning as expressed in the Planning White Paper and with regard to the identified areas for regional transport partnerships for instance represent different approaches to regionalisation in that one focuses on city region governance and the other on regionalisation. The overriding concern in relation to city regions is that the area defined should reflect a relatively coherent network around single or multiple defined centres and their related travel to work areas. The Institute believes that with regard to city regions in particular there should be the closest possible coincidence between the geographical areas selected for transport and for development planning.

Content

9. The Institute agrees that the regional transport strategies should complement and support the National Transport Strategy and we support the development of the hierarchy of national, regional and local strategies as a detailed framework for the improvement of transport across Scotland. However, we consider that the Scottish Executive should clarify the relationship between the National Transport Strategy and the National Planning Framework. The 2004 National Planning Framework should feed in to the National Transport Strategy and the National Transport Strategy into the Mark 2 National Planning Framework in 2008. It will also be important to note how these national strategies will link with the Strategic Projects Review being undertaken in 2007, as this will essentially set transport project priorities for the second decade of the 21st century.
10. The principles of integration should apply at all scales within the transport and land use planning system. The national transport strategy should be fully integrated with the wider aims of the SE and in particular with the spatial planning system, recognising where there is a need for joint action with other agencies in the delivery of major infrastructure projects and transport management schemes of national importance. The Institute therefore suggests that the National Planning Framework should be listed under the other relevant strategies listed in paragraph 15 and detailed in Annex E.

C: Inputs

11. The Institute agrees with the iterative process of strategy development between RTSs, structure plans and strategic development plans as identified in the guidance and the suggested benefits that should result from joint working. We are also pleased to see the reference given to SPP17 and the need for RTSs to support this policy.
12. We consider that there is now a comprehensive and up to date suite of guidance that encourages an integrated approach at the implementation level. The updated PAN 75 and the new Transport Assessment and Implementation Guide and the Scottish Transport Appraisal Guidance (STAG) are all excellent documents that will be of assistance in achieving integration at the local level. Further thought might be given to producing joint guidance regarding processes of consultation and integration at the regional level. We note here the approach taken to the development of PAN 76 on Residential Streets, which was jointly published by the SE Planning and Transport Divisions and was supported by advice on road construction consent procedures.

D: Process

13. The Institute supports the detailed guidance on stages in the process and the links made to SEA legislation and STAG guidance. We consider that it would be useful to include more read-across to land use planning and community planning documents at this stage particularly with regard to scoping, vision setting, objectives, spatial options and priorities. However, we recognise the difficulties inherent in the short timescale for the completion of strategies and the different time horizons and stages of development of local, regional and national transport and plans when compared with the National Planning Framework, structure and local plans.
14. The Institute considers effective integration with the land use planning process as essential for the development of regional transport strategies. In approving regional transport strategies, we would encourage Ministers to take account of this relationship in terms of both process and content and would recommend that specific reference be given to relations with related land use plans in paragraph 77.
15. We note the guidance in paragraph 89 that *'councils should strive to deliver all their services in line with the RTS and should reflect on this when inputting to the RTS in the first place'*. At the regional level it will be essential that professional planners are directly involved in and provide input to the preparation of the new regional transport strategies and that new levels of joint working between transport and land use planners are achieved. We note for instance that this consultation has been distributed directly to all Local Authority Chief Executives and Heads of Transportation or equivalent. Given the close relationship between transportation and land use planning identified we would recommend that future consultations might also be distributed directly to Local Authority Heads of Planning.

Conclusions

16. The Institute welcomes the publication of this draft guidance and the potential that it brings for closer integration between transport and land use planning in

the future. We consider that this integration should be a core purpose of the guidance and that considerable opportunities exist for a new culture of closer working relations between land use and transport planners. We would welcome the opportunity to work with agencies and in particular with Transport Scotland to achieve joint objectives in the future.

17. The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification please do not hesitate to contact Veronica Burbridge, Scottish Planning Policy Officer, RTPi Scotland, at our Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, email: veronica.burbridge@rtpi.org.uk