



**RTPI**

mediation of space · making of place

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08 April 2009

LTP Consultation  
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Great Minster House  
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Email response sent to: [LT.PLANS@dft.qsi.gov.uk](mailto:LT.PLANS@dft.qsi.gov.uk)

Dear Sir/Madam,

**RESPONSE TO CONSULTATION PAPER:  
Consultation on Local Transport Plan 3 Guidance**

The Royal Town Planning Institute is the leading professional body for spatial planners in the United Kingdom. It is a charity with the purpose to develop the art and science of town planning for the benefit of the public as a whole. It has over 22,000 members who serve in government, local government and as advisors in the private sector.

This document responds to the Department for Transport's Consultation on Local Transport Plan 3 Guidance. The response has been formed by drawing together internal consultations through our Transport Planning and Development Planning Networks and comments involving the wider membership of the RTPI.

Please find below the RTPI response to specific questions set out in the consultation document.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 020 7929 9466 or email [policy@rtpi.org.uk](mailto:policy@rtpi.org.uk).

Yours sincerely,

Rynd Smith  
**Director Policy and Communications**  
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Enc.

Q1. Is it clear what is required of LAs in producing an LTP, bearing in mind the changing nature of the relationship between central and local Government as discussed in the guidance?

Q2. Does the guidance strike the right balance between brevity and giving support to authorities in developing plans?

Q3. Does the approach to the Policy Handbook work, including having a web-based version that can be updated?

Q4. Is guidance clear and understandable to a non-transport audience?

Our members felt that the answers to all four of the questions posed in the document was 'yes', with regard to the document itself: As a general point we welcome the new guidance and the approach it takes to Local Transport Plans. The movement towards more flexible plans to suit local and regional circumstances is welcomed and should result in more focused, flexible documents which have evolved to meet the specific aims of each plan-making authority. The additional freedoms and flexibility of approach now proposed for LTPs are welcomed as we believe this should facilitate better co-ordination of planning timescales and the programmes for preparation and consultation.

The emphasis on setting transport in a wider context is also welcomed. There are significant opportunities for transport to contribute to the wider agenda (e.g. health, environment) of an area, for example through its contribution to green infrastructure networks, the opportunities it can provide for active travel (i.e. walking and cycling) etc.

## Specific Comments

### Integration of Spatial and Transport Planning

The RTPi strongly emphasises the need for the guidance to highlight the importance of the integration of Spatial and Transport Planning and overall it was considered that the LTP3 Guidance should give more emphasis to coordination between different aspects of spatial planning. The RTPi regards it as essential that both strategy and implementation plans for transport are related to relevant Local Development Documents (LDDs) within Local Development Frameworks (LDFs) and indeed take account of Regional Spatial Strategies (RSS) and emerging (single) Regional Strategies. This is particularly important in two-tier local authority areas where the responsibilities for LTPs and LDDs are split between the tiers. The accompanying 'Policies and Best Practice' signposts good practice in a number of cases – examples of successful LTP/LDD integration would be useful in this regard.

Whilst Section 3.7, paragraph 23, notes the need for integration and alignment of LTPs and LDFs, it was felt that more attention should be given in the guidance to the implications of better integration of transport within spatial planning, for example in relation to: programmes for preparation and consultation, forecasts, modelling and evidence base; formulation of goals and options; evaluation and appraisal techniques; and funding. Furthermore, Section 4.7 B (*Specifying problems/challenges*) and Section 4.7 C (*Option generation*) could also say more about the importance of spatial plans and the need for a shared evidence base relating movement demands and sustainable solutions.

### LTP Consultation

The RTPi recommend that the guidance encourages early stakeholder engagement. Section 4.11, paragraph 42 suggests that *'to avoid consultation overload, it may be possible to link consultation with other documents (e.g. the local Sustainable Communities Strategy or the LAA).'* The RTPi feel that this statement could be strengthened. In many cases, consultation can be linked with the development of a relevant LDD, such as a Core Strategy or Action Area Plans with significant transport implications. At a more micro level, it is possible to link consultation on transport proposals with consultation on related regeneration or development schemes. In the column entitled 'other consultees' of Annex C to the documents (Suggested Stakeholder Consultees), regional airports (where appropriate) could be usefully added. Airports often act as major transport hubs in their own right and need to be taken account of in the formulation of LTPs.

### LTP Funding

The justification for funding of transport schemes and approaches to funding also needs to be linked to related spatial development proposals in most cases and articulated in Local Authorities Infrastructure Delivery Plans. Statements in

Section 3.5 of the draft Guidance about the need to consider development contributions in relation to alternative sources of funding could be usefully strengthened. The RTPI points to the need to consider what component this will form in the funding of transport infrastructure, especially if the Government's Community Infrastructure Levy proposals, legislated for in the Planning Act 2008 are implemented.

The RTPI supports the maintenance of a close link between LTPs and Regional Funding Advice. Section 3.5, paragraph 15, merely indicates that authorities should 'have regard' to the indicative allocations resulting from that process. However, the role of Local Authorities in the formulation of evidence and reasoning in support of the RFA is important, not simply the resulting financial allocations. The RTPI strongly believes that funding should respond to the detail in Local Authorities Infrastructure Delivery Plans to ensure that it meets authorities' development trajectories.

### **LTP relationship with Regional & Sub-regional tiers**

Section 3.6 states that '*LTPs should in due course clearly articulate how they contribute to regional objectives.*' Delivery of a single regional strategy should rank highly in the justification for transport schemes (economic, environmental, social or development-related).

The section addressing spatial coverage of an LTP (Section 4.5) is also considered of particular importance. It is vital that cross-boundary issues are considered. In many rural counties, cross boundary transport issues are vital for those areas on the peripheries of the county. Within a region there can also be marked differences between different neighbouring county areas in the quality and quantity of public transport provision and transport infrastructure. The case for joint working on LTPs at a sub-regional level, perhaps linked to a Multi-Area Agreement may also suggest a need for co-ordination with spatial planning at this level. (This guidance may not be the place to suggest joint, sub-regional approaches to spatial planning, but the possible advantages for effective co-ordination could be mentioned.)

### **Developing the Plan**

Section 4.7 concerns developing the plan. It is considered important that this mirrors as far as possible the Towards a Sustainable Transport System (TaSTS)/Delivering a Sustainable Transport System (DaSTS) process and the conclusions this draws from Eddington and Stern. Mention of international gateways in Goal 1 could be useful in this regard.

### **LTP Appraisal Processes**

The appraisal processes, including SEA and Habitat Regulations Assessment should also, wherever possible be conducted in conjunction with related spatial plans. They are unlikely to make sense in isolation and there is scope for economies by combining the processes. In order to help local transport authorities understand the new environmental requirements introduced since the last round of LTPs, additional detail/guidance on the environment duty and Habitats Regulations Assessment, and its application to LTPs would be welcomed.

### **Climate Change**

The RTPI encourages the development of strategies and implementation plans that take significant steps towards mitigating climate change, however the Institute is of the view that this guidance could however say more about climate change adaptation, as it is clear that our society will have to manage sea level rise and less predictable changes to rainfall and drainage patterns that are already emerging, even if we succeed in delivering to current climate change emissions targets.

Overall the RTPI did not consider that the Consultation paper on 'Delivering a Sustainable Transport System: Planning for 2014 and Beyond' included sufficient recognition of the threats to the natural environment relating to climate change and the extent to which management of the transport network could help the natural environment adapt to the impacts of climate change in the future. Section 3.2 (National transport goals) paragraph 4 states that 'local authorities will need to consider the relative importance of the five goals for the area.' The RTPI believes that a much stronger line should be taken in asserting the need to prioritise the goal of 'Tackling Climate Change,' in the Local Transport Plans as it is expressed in PPS1 in relation to spatial planning and sustainable development.

### **Other Matters**

The RTPI regards it as sensible to incorporate, wherever possible, Rights of Way improvement plans into LTPs as

section 4.13 (d) mentions. In addition, with reference to the accompanying Policy & Best Practice Handbook, the RTPI suggests that to make the document more user friendly/useful that a short summary of each document is included.