Introduction
Strathclyde Partnership for Transport (SPT) welcomes the opportunity to put forward views to the Transport, Infrastructure and Climate Change Committee on the relationship between transport and land use planning policies. SPT as the Regional Transport Partnership (RTP) for the west of Scotland is a “key agency” in terms of the development plan process. We actively work with each of our member councils to promote better integration of the Regional Transport Strategy’s transport priorities and objectives with the local transport strategies and local development plan policies and proposals. We also seek to promote improved integration of sustainable transport in responding to planning applications. We have a number of comments to make in response to the questions posed by the Committee and would request these be taken into consideration.

Question 1 Is enough thought given to providing modern integrated transport connectivity and sustainable public transport provision when preparing strategic and local development plans?

Planning etc (Scotland) Act 2006
SPT considers that the introduction of the Planning etc (Scotland) Act 2006 along with the production of the National Planning Framework 2 (NPF2), Scottish Planning Policy (SPP) and Designing Streets provides a greater focus on integration between transport and land use planning policies. In particular, the SPP retained the thrust of Scottish Planning Policy 17 – Planning for Transport.

Sustainable Travel and Transport
Throughout NPF2 there are a number of references to encouraging a shift to more active and sustainable modes of travel and transport and we recognise that the relationship between transport and land use is central to the Scottish Government’s Sustainable Economic Development and Climate Change agenda. A shift to more sustainable modes of travel and transport is a strategic objective of SPT’s Regional Transport Strategy (RTS) for the west of Scotland 2008 - 21, approved by the Scottish Minister in June 2008. As a RTP, SPT is responsible for creating and delivering the statutory RTS. We consider that the better integration of transport and land use planning at the regional and local level is central to the future delivery of the RTS outcomes as well as the delivery of sustainable development and a reduction in emissions through development plans.

The National Transport Strategy (NTS), RTS and many Local Transport Strategies (LTS) advocate a better relationship between the policies and proposals set out in transport strategies and the policies within development plans.

Development Plans
There are 12 local authorities within the SPT area and as a “Key Agency” for the development plan process we have an enhanced and valued role in providing comments and advice on active travel, public transport, freight, transport interchanges and regional roads for planning authorities. SPT reviews a number of strategic and local development planning documents and we consider that there is a wide variation in the extent to which these include sustainable travel and transport, transport interchanges and freight provision.

Most development plans have a transport section with specific policies on sustainable travel and transport. We consider that, since reducing the need to travel along with the provision of active travel and travel by public transport, are key to the success of sustainable economic growth and the reduction in emissions, there should be an emphasis on sustainable travel and transport throughout the entire development plan and possibly within each subject policy. Greater recognition of the challenges and constraints in the delivery of new transport projects and a better understanding of existing transport capacities would be helpful.

Engagement Process
Since the introduction of the changes to the planning system under the Planning etc (Scotland) Act 2006, we are encouraged by the amount of engagement with planning authorities who have begun work on the production of the new Strategic Development Plans (SDP) and Local Development Plans (LDP). SPT has provided advice and information to help planning authorities produce Main Issues Reports (MIR). We hope that the partnership approach and the good relationships formed during this process will enable a better integration of transport and land use planning policies. There are certainly early signs of this integrated approach within the development planning process and we hope that this will continue through to the final adopted development plan.
Regional Transport Partnerships
As an RTP, SPT has a distinct remit for regional transport with a focus on intra-regional connectivity. SPT can provide a role for the Scottish Government by helping to ensure that development plans provide modern integrated transport connectivity and sustainable public transport provision and that in the development management process we can help ensure that the policies set out in development plans are being applied to development proposals and considered in the determination of planning applications. We would ask that the Committee considers the positive role SPT can make to better integration of transport and land use planning, connecting local, regional and national transport policies.

Question 2 Does the consideration of individual planning applications for significant developments take into account the need to provide appropriate solutions?

Planning Application Process
We agree with the comments made by Derek Halden at the Transport, Infrastructure and Climate Change Committee on the 20 April 2010, that transport planning policies are set out in development plans but sometimes not followed in practice. It has been our experience that active travel and public transport provision are often considered too late in the planning process or are implemented at a late stage in the development of a site.

In particular, SPT has raised concerns regarding the development of large significant sites that are being carried out in phases where sustainable transport and travel are not being considered in a strategic or holistic manner. In almost all cases, both the structure plan and local plan set out clear policies requiring an integrated development with good active travel and transport links. Most large development sites are also backed up by masterplans or development framework/briefs that set sustainable development parameters, promoting effective active travel networks and efficient public transport systems. There is a concern that the terms of the approved planning policies and masterplans for Community Growth Areas (CGAs) are not reflected in submitted planning applications.

In discussing and reporting these failings to local authorities and developers, the reasoning given for lack of sustainable travel and transport measures is mainly down to finances. However, these developments are still gaining planning permission with unrealistic and very optimistic conditions that transport interventions will eventually be provided at the site. However there is no guarantee of timescales or identification of funding source for these active travel or transport interventions. Therefore developments are proceeding where the car continues to dominate as a means of getting to and from the site, contrary to the Scottish Government’s commitment to a low carbon economy.

A recent example of this practice is found in the development of a CGA, where the structure plan and local plan policies along with the masterplan for these sites indicate the requirement for enhanced public transport, active travel networks and connections. However the plans submitted as part of the planning application process provide little penetration of bus services, poor links and access to existing public transport networks and facilities and a very limited vision for walking and cycling provision.

Bus Provision
An issue that we feel requires consideration is the provision of buses to new development sites. In relation to development proposals and the need for good transport provision to be established early at sites, we consider that bus operators committing to providing new bus services or re-routing existing services to development sites, in a deregulated market, is problematic. In most cases, unless there are subsidies from the developer, bus operators are reluctant to provide the necessary bus services early in the development process. We consider that it is crucial to ensure walking, cycling and public transport provision is visible, within easy access of the development site and available to people from the outset, otherwise many will get used to the car as a means of getting around. Changing this mindset once a routine or behaviour has been embedded is difficult to alter.

Cumulative Impact
We also consider that the cumulative impact of many smaller developments in an area is often not considered when ensuring adequate sustainable travel and transport provision. SPT recognises that the cumulative impact of many developments at cross boundary locations is not strategically considered by planning authorities. Given the strategic focus of SPT’s remit, we are more able to identify these issues and alert the relevant local authorities to any issues related to the accumulation of developments within an area.
This is an important role that we feel can be carried out and identified by RTPs at the development plan stage to try to mitigate significant cumulative impacts.

Question 3 What practical steps could be taken through the integration of transport and land use policies which could help reduce greenhouse gas emissions?

Scottish Government Policy
NPF2, SPP and Designing Streets all provide a framework for better integration of transport and land use planning which, if successfully embraced and put into practice, will undoubtedly result in a reduction of greenhouse gas emissions. Further work and training is needed to communicate these documents with transport professionals, operators and indeed local communities.

Partnership Working
SPT, through our work with SCOTS (Society of Chief Officers of Transportation in Scotland) and our constituent councils, can confirm that there is a lack of understanding, or in some cases a resistance, to some of the policies set out in documents such as Designing Streets and the SPP because of a lack of clarity of when and where these policies apply and, in practical terms, there are doubts over the implementation of these policies in certain circumstances. We consider that in order for planners, roads engineers, architects, designers, developers and the public to understand the framework set out by the Scottish Government’s policies then there should be suitable training for all. Training should not be restricted to isolated groups, we feel that it is important that all professions come together and work in partnership and embrace these transport and land use concepts. It requires a culture change in the working practices of many professions and, to achieve this, a focus on the potential gains that can be achieved through these new policies.

Working Groups
Consideration should be given to setting up a national framework of working groups. A partnership approach, should be shared with different professions from all over the country being grouped together to discuss best practice, benchmarking and share experiences and ideas, helping each other through the initial embedding phase. Cluster groups could be set up in a geographical context and representatives of each group could come to a national group held centrally to discuss and share experiences. The Scottish Government could attend and would benefit from feedback on their policies. At present professions discuss issues in their own silos and can become frustrated when advising on or putting policies into practice. At present there is not a clear understanding of each others remit, knowledge of transport and land use planning and a sense of shared final objectives. A number of working groups set up nationally are likely to recognise this common agenda and work more efficiently towards the Scottish Government’s targets on tackling climate change.

The Regional Transport Strategy
SPT as an RTP can play its part in providing the necessary integration between national, regional and local strategies and policies through a strategic transport focus and an overview of the land use and transport implications beyond and between each local authority boundary. We feel that through the various studies that we undertake, along with modeling of the land uses, active travel networks and transport corridors, we can help provide a framework for the integration of transport and land use policies and are actively working with planning authorities to improve this relationship.

Local Level
SPT considers that a practical step that could be taken at the local level is that the local transport strategy (LTS), the local development plan (LDP) and other environmental assessments that require to be carried out by councils, such as air quality and carbon footprint assessments, should be undertaken and produced in a phased, logical and integrated way. Each strategy, plan or assessment should inform the policies or recommendations set out in all local authority documents as we believe that this would help integration and partnership working at the local level. This requires better project management skills, greater coordination and a commitment to working across disciplines and coordination between relative disciplines.

LTS Guidance
SPT has been working on revised LTS guidance with our member councils. As part of this framework and guidance, SPT is encouraging local authority transport professionals to work with their planning and environmental colleagues to ensure better integration of policies. Once produced and accepted by the
constituent councils, the LTS guidance could set a framework for other RTPs to implement within their partnership area.

Consultation Protocol for SPT’s Review of Planning Applications
Recently SPT has also commenced work on producing a Consultation Protocol that sets out what SPT does, what advice and expertise we can offer local authorities and identifies an agreed framework for consultation for planning applications. This has received very positive feedback from the local authorities within SPT’s partnership area. Many have commented that a good understanding between partners within the formal framework set out by protocol should ensure better integration of land use and transport at both the regional and local level.

Investment Programmes
Given the constraints on public spending over the next few years, the delivery timescales for transport priorities in the Strategic Transport Projects Review (STPR) require to be reviewed and updated with a reassessment of sustainable transport interventions that are likely to have the most impact such as Subway modernisation, implementation of Bus Rapid Transit programmes and upgrades to the existing rail network. We feel that this would provide clarity to the SDP and LDP process, safeguarding potential areas for development.

Developer Contributions
As well as constraints on public sector finances there is also likely to be further diminution of private sector funding. Developer contributions for planning applications have dramatically decreased over the last two years and therefore we consider that plans and policies need to be more realistic when identifying sites that require transport infrastructure improvements, enhancements or interventions. We recognise that development plans set a vision for the future, however planning authorities must also ensure that the policies and vision maintain some realism that development can take place in areas identified in land use plans.

It is to be hoped that once economic recovery is fully underway, a clear approach is adopted by planning authorities, ensuring the transport benefits of future developments is reflected in effective policy guidance.