



SPT responses to consultations on the National Transport Strategy and the Scottish Planning System

Date of meeting 31 March 2017

Date of report 3 March 2017

Report by Assistant Chief Executive (Operations)

1. Object of report

The object of this report is to recommend approval of SPT's responses to the following consultations being undertaken by Transport Scotland (TS) and the Scottish Government respectively:

- National Transport Strategy (NTS) Early Engagement Survey – responses due by 31 March 2017. SPT's draft response is attached at Appendix 1; and
- "Places, People and Planning – A Consultation on the Future of the Scottish Planning System" – responses due by 4 April 2017. The key principles of SPT's proposed response are attached at Appendix 2.

2. Background

2.1 NTS Early Engagement Survey

Members will recall¹ that TS is currently undertaking a National Transport Review² which will ultimately culminate in a new National Transport Strategy, Strategic Transport Projects Review and, potentially, a new Transport Act. Officers continue to engage with TS in this regard and SPT is represented on the NTS Partnership Group. In order to gather initial views, TS has issued a strategic, high level survey³ seeking early views on the NTS and areas for focus in future.

2.2 Review of the Scottish Planning System

Members will again recall⁴ that the Scottish Government had commissioned an independent panel to review the Scottish planning system, and that SPT had responded to their call for evidence. The Scottish Government is now undertaking a

¹ See Strategy and Programmes Committee report from September 2016 - <http://www.spt.co.uk/documents/sp090916agenda7.pdf>

² See <http://www.transport.gov.scot/strategy/national-transport-strategy>

³ The full survey can be accessed until 31 March 2017 at <https://response.questback.com/isa/gbv.dll/ShowQuest?QuestID=4901922&sid=IGEb4qIvYr>

⁴ See Partnership report from December 2015 - http://www.spt.co.uk/documents/rtp111215_agenda9.pdf

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formal, wide-ranging consultation on the future of the Scottish planning system⁵ with a view, subject to responses, to introducing new legislation to enact any change.

3. Outline of proposals

3.1 NTS Early Engagement Survey

SPT's draft response is attached at Appendix 1. The response is naturally high-level and strategic given the nature of the questions, and there will be significant opportunity for further, more detailed input throughout the NTS development process. However, this survey provides the opportunity for SPT to provide views in principle which will guide our priorities for engaging on the NTS in future.

3.2 Review of the Scottish Planning System

The Planning Review consultation document is of a considerable scale and covers many issues in detail. Attached at Appendix 2 are the key principles of SPT's responses to each of the 'key changes' identified by the Scottish Government. Responses are due by 4 April 2017, and officers will continue to develop these principles with a view to making copies of the full SPT response available at this Partnership meeting for members review.

4. Conclusion

- 4.1 These two consultations highlight the fact that there is currently considerable dialogue regarding both planning and transport in Scotland. It is essential that SPT has significant input to any debates on these issues, and officers will continue to engage with relevant organisations in this regard and continue to keep the Partnership apprised of developments in future.
- 4.2 On a separate but related note, officers continue to undertake the review of the Regional Transport Strategy and a paper detailing the outcome of that review will be presented to the Partnership after the summer recess.

5. Partnership action

The Partnership is recommended to:

- Approve SPT's draft response to the NTS Early Engagement Survey attached at Appendix 1; and
- Approve the key principles of SPT's proposed response to 'Places, People, and Planning: A consultation on the future of the Scottish planning system' attached at Appendix 2.

6. Consequences

Policy consequences	<i>In line with the RTS.</i>
Legal consequences	<i>None at present.</i>
Financial consequences	<i>None at present.</i>
Personnel consequences	<i>None at present.</i>

⁵ See <https://beta.gov.scot/publications/places-people-planning-consultation-future-scottish-planning-system/>

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Equalities consequences *None at present.*

Risk consequences *None at present.*

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APPENDIX 1

NTS Early Engagement Survey – SPT response – March 2017

Q. The current strategy sets out 3 outcomes: improved journey times and connections, reduced emissions, improved quality, accessibility and affordability. Do you think each of these will be still be relevant over the next 20 years?

A.

SPT stand ready to assist the Scottish Government and other partners in playing a central role in delivering transport solutions across the west of Scotland. Our track record of delivery – smartcard, Fastlink, Subway Modernisation and much more – is concrete proof of our experience, and we are committed to helping deliver an NTS that will enable us to maximise and build on our current and previous successes, creating a world class transport system for the people and communities of the west of Scotland.

Yes - the underlying themes behind the 3 outcomes are likely to remain perennial challenges for transport. However, their priority and position in the hierarchy of issues needing addressed may alter or change in a future where, for example, technological advances and their effects on the way we work and travel are likely to be major issues.

The NTS outcomes must remain in line and complementary to the National Outcomes. Transport remains a derived demand and will continue to be so however it is not given the priority it deserves.

A key part of getting the priorities and hierarchy right will be to undertake a robust, evidenced NTS development process. SPT look forward to participating in this, utilising the knowledge, evidence and expertise gained from the development of the Regional Transport Strategy for the west of Scotland. Moreover, we anticipate playing a key role in delivering the solutions required to achieve the NTS outcomes.

Finally, it is vital that people – as walkers, cyclists, public transport passengers, drivers - are at the heart of and are the focus of the NTS; any outcome, policy, proposal or initiative should highlight the benefits for people so that the NTS is a meaningful document for everyone in Scotland.

Q. if not, what strategic outcomes should transport be trying to achieve?

A.

Any new Strategic Outcomes must arise out of the robust process mentioned above, but must reflect the increasingly recognised cross-cutting effects of transport across the wider policy spectrum in Scotland. For example, the role of active travel in achieving outcomes in health policy, and the role of Demand Responsive Transport services such as SPT's MyBus in addressing isolation (and their positive effects on mental health and wellbeing), are now more widely understood and must be reflected in the new NTS.

Similarly, it is very important to remember that 'one size does not fit all' across Scotland; for example, the long-term effects of the current significant decline in bus patronage in the west of Scotland (down 56m over 10 years) are yet to be seen, but most certainly will and should

impact on the shape of future NTS outcomes. On a more strategic note, there are regional differences in land use/development patterns, economies, existing transport networks etc – therefore need to ensure any new strategic outcomes will be delivering a beneficial societal impact for all of Scotland. So what is required in one area may not be in another, and Regional Transport Partnerships, local authorities, and others, will play a key role in addressing such issues, and delivering the solutions needed.

There will, of course, remain tensions across policy areas – for example, investment in new roads stimulating car use against commitments to reduction in carbon emissions in transport - and the NTS outcomes should help set the tone for addressing these tensions, especially as they are likely to guide future resource alignment.

Further, while the resultant Strategic Transport Projects Review (STPR) arising from the NTS will focus on infrastructure, it is just as important for the NTS to focus on non-infrastructure policies and initiatives which will be essential in assisting to deliver NTS outcomes e.g. bus policy.

Q. If there is one thing that needs to change substantially now in transport, what would that be?

A.

The current crisis in the bus market in the west of Scotland deserves and needs special attention. It remains a wholly regrettable but undeniable fact that the pivotal role of bus in our society continues to be underappreciated. The negative effects of this are plain to see in our towns, cities, and rural areas; be it no services after 6pm, or slower journeys due to congestion on the network, for too long bus has shouldered the blame, when in reality it is at the heart of any solution. Bus – which accounts for four-fifths of all public transport trips - remains an essential part of ensuring that everyone can participate in any growth of our economy, yet is all too often, by accident or design, forgotten or ignored in planning for the future. This situation must change and SPT will seek to ensure that the NTS and forthcoming new Transport Bill provide the national framework for effecting the positive change required.

The new Transport Bill provides an opportunity to provide deliverable market reform initiatives, which can be used where, if appropriate and evidenced, the current “full” deregulation system can be shown to be both inefficient and detrimental to demand. The continuing function of bus as the key delivery agent for community planning / social policy is essential e.g. independence for older people, improving health outcomes, access for rural areas, accessibility for younger people and those without access to a car.

Notwithstanding the above, there is no ‘silver bullet’ or ‘one thing’ that will of itself solve all problems - there are many issues which need to change (and have needed to change for many years) in transport – for example, improved modal integration, better co-ordination between organisations, more effective approaches to carbon reduction – and these are issues that SPT has and continues to address. Indeed, the opportunity that SPT presents at a regional level must be maximised in future; be that through greater powers of direction,

more funding, delivering efficient transport solutions (and associated savings), or a more integrated approach to land-use planning.

A fundamental issue remains that the focus must be to achieve the appropriate and complementary level and mix of interventions and governance arrangements to generate sustainable, long term, inclusive growth.

Q. What do you think the main transport challenges and opportunities will be over the next twenty years?

- Minimising unnecessary trips by car and the impact of congestion in our towns and cities.
- Growing the demand for all public transport modes as an alternative to car use and to improve accessibility / arresting the decline in bus patronage.
- Holistically examining the affordability of transport particularly with regard to those with lower incomes.
- More effectively dealing with carbon emissions across all transport sectors – road traffic, waterborne transport, freight, public transport.
- Managing the transition between ‘traditional’ public transport and the effects of new or advancing technology on demand.
- Ensuring that public transport and active travel continue to play their part in sustainable economic growth while reducing social exclusion in an integrated way, and ensuring appropriate resources are allocated for delivery.
- The impacts of an ageing population on demand for and supply of transport, and the costs and benefits of provision.
- Harnessing new, disruptive or advancing technology to improve transport’s role in accessibility, safety, environment, social inclusion and other related issues.
- Ensuring ‘big data’ opportunities are harnessed to deliver public policy objectives.
- Meaningful integration of transport with land-use planning, economic development and sustainability policies.
- Ensuring all communities benefit from the opportunities inherent in technological advances and are not excluded by inability to access technologies or private transport.
- Better integration of demand responsive, health and social care transport through initiatives such as SPT’s Integrated Transport Hub, and adopting a ‘total transport’ approach to integrated service delivery.
- A holistic and integrated approach to funding for transport, maximising societal benefit from diminishing subsidies.
- Understanding and preparing for changes to freight transport, influenced by the increasing demands on that sector through changes to the way we live and work.
- Ensuring that today’s efforts to achieve positive behavioural and attitudinal change within the younger generation is not ‘lost’ as this generation moves on to new life stages.

Appendix 2

“Places, People and Planning: A consultation on the future of the Scottish planning system” – Key principles of SPT’s response

Note: the sections in italics below are the ‘key changes’ identified by the Scottish Government in the consultation document. SPT’s view in principle follows each proposed key change.

Making Plans for the Future

We want Scotland's planning system to lead and inspire change by making clear plans for the future. We propose:

1 - Aligning community planning and spatial planning. This can be achieved by introducing a requirement for development plans to take account of wider community planning and can be supported through future guidance.

SPT: We welcome this but would be concerned about the impact on already stretched resources (for example, arising from the Community Empowerment (Scotland) Act) (CESA) in dealing with it effectively.

2 - Regional partnership working. We believe that strategic development plans should be removed from the system so that strategic planners can support more proactive regional partnership working.

SPT: SPT believes that the removal of SDPs from the planning system is a retrograde step that appears contradictory to best practice and could leave a worrying gap in the planning hierarchy in Scotland. Furthermore, it could lead to greater centralisation of planning decision-making to national level at a time when the Scottish Government are seeking to encourage more local, community involvement in public sector decision-making. Further detail is required around the Government’s view on the mechanism for non-statutory regional partnership working; despite the theoretical attractiveness of ‘voluntary’ partnership working, it is unlikely that it will deliver the expected results.

It is worth highlighting that such a “one size fits all” approach is not appropriate in Scotland and, while there may be concerns over the effectiveness of strategic development planning in other areas of Scotland, Clydeplan have proven to be an effective and useful organisation who have delivered a robust SDP for the Glasgow and Clyde Valley area. To lose this asset, merely on the basis that it hasn’t worked as well elsewhere, would be not only short-sighted, but could be needlessly damaging to the planning system in the west of Scotland. In demonstrating our commitment to regional strategic planning, SPT recently agreed a partnership concordat with Clydeplan.

We do however, welcome emphasis on the importance of regional partnership working and would expect a stronger role for RTPs such as SPT in any new planning system.

It is worth highlighting that there is specific reference within the consultation document (section 1.15) to reviewing the “roles, responsibilities and areas of influence” of RTPs, and views being sought on those issues through the planning consultation. Given that the National Transport Review (NTR) will also be looking at roles and responsibilities in transport, the RTPs of Scotland sought clarification from both the Scottish Government and Transport Scotland as to where responsibility for this lay – within the planning review or within the NTR. The RTPs were subsequently advised that this work stream would be undertaken as part of the NTR, not the planning review.

3 - Improving national spatial planning and policy. The National Planning Framework (NPF) can be developed further to better reflect regional priorities. In addition, national planning policies can be used to make local development planning simpler and more consistent.

SPT: Similar to response to 2 above, there is a danger of increased centralised control at national level, and the NPF dictating in detail at all levels of planning when, as its name suggests, it is supposed to provide a ‘framework’ for national scale developments for the regional and local levels to follow. In addition, mechanisms to allow Local Development Plans flexibility to respond to locally specific circumstances must be considered.

4 - Stronger local development plans. We believe the plan period should be extended to 10 years, and that 'main issues reports' and supplementary guidance should be removed to make plans more accessible for people. A new 'gatecheck' would help to improve plan examinations by dealing with significant issues at an earlier stage.

SPT: We welcome this and support the principles outlined, but await detail of how this would work in practice before committing fully to the proposals, given the proposals at 1-3 above. However, the ability for review must be built into the 10 year development plan to provide the flexibility to respond to changing circumstances. In addition, there is potential that the ‘gatecheck’ process would impact on local accountability.

5 - Making plans that deliver. We can strengthen the commitment that comes from allocating development land in the plan, and improve the use of delivery programmes to help ensure that planned development happens on the ground.

SPT: There is significant merit in this proposal and SPT would expect to see a strengthened role for RTPs in planning and programmes for transport in their regions.

People Make the System Work

We want Scotland's planning system to empower people to decide the future of their places. We propose:

6 - Giving people an opportunity to plan their own place. Communities should be given a new right to come together and prepare local place plans. We believe these plans should form part of the statutory local development plan.

SPT: Again, while we welcome this in principle, the reality of how it would work in practice could have significant impact on already stretched resources. The relationship between this proposal and CESA needs to be reviewed, understood and integrated. Clarity is required on what the scope of these plans could be and their relationship with LDPs.

7 - Getting more people involved in planning. A wider range of people should be encouraged and inspired to get involved in planning. In particular, we would like to introduce measures that enable children and young people to have a stronger voice in decisions about the future of their places.

SPT: Similar to 6 above, while we welcome this in principle, we would highlight that the CESA has created provision for such engagement in future and so duplication must be avoided.

8 - Improving public trust. Pre-application consultation can be improved, and there should be greater community involvement where proposals are not supported in the development plan. We also propose to discourage repeat applications and improving planning enforcement.

SPT: Again, the points at 6 and 7 above would be emphasised in response to this proposal. SPT would highlight that the system can work better where, a range of stakeholders are involved in pre-application consultation and discussion. In addition to local communities of place and/or communities of interest, 'pre-application consultation' with the relevant Public Transport Authority (SPT for the west of Scotland) should be made statutory. This is in line with our aspirations noted in the proposal for the Strathclyde Bus Alliance, and to support sustainable travel solutions, in line with the Scottish Government's objectives.

It remains an anomaly within the planning system that organisations such as RTPs are not given a greater role in the development management process at a strategic level. The increasing rationalisation of e.g healthcare and colleges brings with it significant challenges for public transport. Such decisions often pay insufficient attention to the capacity and capability of public transport to sustainably deliver services. These challenges can be compounded by poor locational choices.

9 - Keeping decisions local - rights of appeal. We believe that more review decisions should be made by local authorities rather than centrally. We also want to ensure that the system is sufficiently flexible to reflect the distinctive challenges and opportunities in different parts of Scotland.

SPT: We welcome this in principle but would need more detail on how it would work in practice (and how it would integrate with other recommendations) before committing full support. In addition, the wider implications of reviewing the hierarchy of development needs to be considered.

Building More Homes and Delivering Infrastructure

We want Scotland's planning system to help deliver more high quality homes and create better places where people can live healthy lives and developers are inspired to invest. We propose:

10 - Being clear about how much housing land is required. Planning should take a more strategic view of the land required for housing development. Clearer national and regional aspirations for new homes are proposed to support this.

SPT: This is to be welcomed but again, it is essential that transport planning is at the heart of any decisions on land allocations and therefore that SPT has a key role in that process. Local and regional knowledge needs to be part of the decision-making process to deliver homes and communities (places in which people want to live,) not just delivering houses to meet development targets.

11 - Closing the gap between planning consent and delivery of homes. We want planning authorities to take more steps to actively help deliver development. Land reform could help to achieve this.

SPT: We welcome initiatives which speed up the planning process provided it remains robust, ensuring that development is delivered in the right place, and that SPT is consulted early and meaningfully where there are strategic transport impacts on the network.

12 - Releasing more 'development ready' land. Plans should take a more strategic and flexible approach to identifying land for housing. Consents could be put in place for zoned housing land through greater use of Simplified Planning Zones.

SPT: Again, we would welcome this, provided that transport is not treated as an afterthought or hindrance in the process as has, regrettably, been the case in the past.

13 - Embedding an infrastructure first approach. There is a need for better co-ordination of infrastructure planning at a national and regional level. This will require a stronger commitment to delivering development from all infrastructure providers.

The aspiration to better align infrastructure and development delivery is welcome in principle. However, the detail causes concern. While the principle of “infrastructure first” is seductive from a development point of view, the impact on services (and on-going revenue costs) needs to be given similar weight. The centralised approach of a national infrastructure and development delivery group would appear to be at odds with nationally agreed policies on local accountability and community empowerment. We welcome the acknowledgment that infrastructure planning and development at a regional scale is of significant importance in the planning and delivery of

development. However, as set out above, the proposals for non-statutory regional partnerships give cause for concern. It is essential that the appropriate mechanisms are in place to ensure the delivery of regionally significant infrastructure. In terms of transport infrastructure SPT is well placed to lead on this in the west of Scotland

In addition, the relationship between regional partnerships, regional priorities identified within the NPF and role of the national infrastructure and development delivery agency in regional infrastructure audits requires further consideration.

Clarification is also required in relation to what is considered as national, regionally and locally significant infrastructure. Specifically in relation to transport infrastructure, the role of the NTR in identifying the roles and responsibilities in transport planning and infrastructure delivery must be reflected.

14 - A more transparent approach to funding infrastructure. We believe that introducing powers for a new local levy to raise additional finance for infrastructure would be fairer and more effective. Improvements can also be made to Section 75 obligations.

SPT: We agree with this. However clarification is required around the definition of infrastructure. In providing public transport to support new development and to encourage sustainable travel behaviour, bus service provision is often the only option to meeting the needs of a development. The on-going cost of service provision as well as physical infrastructure should be factored into proposals for a local levy. SPT would expect to play a much stronger role in securing contributions for transport developments should these proposals be adopted.

15 - Innovative infrastructure planning. Infrastructure planning needs to look ahead so that it can deliver low carbon solutions, new digital technologies and the facilities that communities need.

SPT: We would fully support this proposal and again, would anticipate playing a central role in this in the west of Scotland. The integration of land use and transport planning is essential to accessibility and quality of place. As set out in relation to proposal 2 above, and as confirmed by Transport Scotland, it is for the National Transport Review to examine roles and responsibilities in transport and not for the Planning review to presuppose, or indeed dictate the outcome of that review.

Stronger Leadership and Smarter Resourcing

We want to reduce bureaucracy and improve resources so Scotland's planning system can focus on creating great places. We propose:

16 - Developing skills to deliver outcomes. We will work with the profession to improve and broaden skills.

17 - Investing in a better service. There is a need to increase planning fees to ensure the planning service is better resourced.

18 - A new approach to improving performance. We will continue work to strengthen the way in which performance is monitored, reported and improved.

19 - Making better use of resources - efficient decision making. We will remove the need for planning consent from a wider range of developments. Targeted changes to development management will help to ensure decisions are made more quickly and more transparently.

20 - Innovation, designing for the future and the digital transformation of the planning service. There are many opportunities to make planning work better through the use of information technology. The planning service should continue to pioneer the digital transformation of public services.

SPT: We are supportive of all the above (16-20) and again would welcome dialogue with the Scottish Government and councils in this regard to maximise interaction with RTPs. Creating “great places” isn’t solely reliant on the planning system. For the planning system to work the skills sets and resources of professionals (and communities) participating in in the planning system should be developed. This includes resourcing and skills within organisations which support local planning authorities such as key agencies like SPT and statutory consultees.