

Barker Review of Land Use Planning A response from the Passenger Transport Executives (Pteg)

Background

Pteg represents the seven Passenger Transport Executives (PTEs) of England and Scotland which between them serve more than thirteen million people in Strathclyde ('SPT'), Tyne and Wear ('Nexus'), West Yorkshire ('Metro'), South Yorkshire, Greater Manchester, Merseyside ('Merseytravel') and the West Midlands ('Centro'). Transport for London (TfL) is an associate member of Pteg.

The PTEs plan, procure, provide and promote public transport in many of Britain's city regions, with the aim of providing integrated public transport networks accessible to all. The PTEs have a combined budget of more than a billion pounds a year, and are funded by a combination of local council tax and grants from national government. They are responsible to Passenger Transport Authorities (PTAs), made up of representatives of local councils in the areas they serve.

Although the Passenger Transport Executives (PTEs) are not directly responsible for land use planning decisions and are not statutory consultees in the development process, they do make representations to District Councils both on planning policy documents and significant planning applications with a view to maximising the public transport accessibility of new developments and to try and influence the policies and proposals included in the Local Development Frameworks (LDFs). This is consistent with the Government's commitment to sustainable development and intention to reduce the need to travel and specifically to reduce car dependence which is reflected in PPG13.

The PTEs try to ensure that strategies in development plans and Local Transport Plans complement each other and they try to influence the location of new development so that it is highly accessible by public transport and located within reasonable walking distance of bus, train or tram. The PTEs also work closely with the Local Planning Authorities in securing developer contributions towards both public transport infrastructure as well as bus services.

Public transport has a key role in supporting economic development through increasing economic competitiveness and social inclusion and in supporting regeneration. It is important that direct connections are made between economic growth and the infrastructure to underpin it and that there is a greater alignment of public sector strategies and programmes.

It is within the context outlined above that the PTEs make contributions towards the planning process and therefore have an interest in responding to the Barker Review of Land Use Planning.

Pteg's response to questions asked by the Barker Review:

- 1. Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?**

The current planning system is slow to respond to the pressures identified above because of the laborious and complicated bureaucracy of both the planning control and policy-making processes. Although the recent planning reforms were intended to 'stream-line' the planning system, they have in fact made it more complicated, and more resource intensive. In particular the production of Local Development Frameworks seems to be almost as long-winded as the Unitary Development Plan process. Unfortunately some of the pressures identified above are becoming more serious and a faster planning process is needed in order to be able address these. Speed should not, however, be at the expense of quality, see 7 below. Perhaps a more devolved planning system, i.e. more local autonomy, such as they have in other European countries could speed up the process.

- 2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?**

The current system is confusing to both the public and to other stakeholders, including the PTEs. There is a plethora of documents to wade through, national planning documents such as Planning Policy Statements (PPSs) the Regional Spatial Strategy, the Local Development Scheme (LDS), Statement of Community Involvement (SCI), a core strategy, area action plans, proposals maps, supplementary planning documents, sustainability appraisals and an annual monitoring report, all of which have a separate statutory process to follow.

In Metropolitan areas, the PTEs need to contribute to planning policy in all the constituent districts and are likely to become involved in all those documents which have implications for public transport, of which there are a high number. In the case of Greater Manchester, there are ten district councils. It is however becoming increasingly difficult to keep abreast of all of these different documents and their consultation timescales, particularly as the Districts are all

running to a similar timetable, which, for consultees, means that all the documents are out to consultation simultaneously which poses difficulties in terms of time and resources. This problem will not only affect the PTEs, but also the business community and other interest groups. Whilst the Government's commitment to consultation is to be welcomed there is a need to make the overall system more manageable and easier to understand and with more decision-making at a local level.

3. Sustainable development is the core principle underpinning planning. Does the current system achieve the right balance between economic and other goals, such as the regeneration of areas and the promotion of social cohesion, improving the quality of design of buildings and urban environments, and the protection and enhancement of our natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?

Sustainable development is a relatively simple concept with a clear UK Government definition. Despite this, it is clear that many people, particularly involved with economic development, do not understand the concept. As a result, economic factors are given far too high a priority when decisions are taken, and other factors, such as improvements in local air quality or reduction in climate change gas production that come from mass public transport are given relatively little weight.

Arguments about economic development often fall into the trap of linking economic growth with more traffic. This need not be the case if there is investment in sustainable transport modes. A further myth is that environmental protection harms the economy. In fact most wealth is generally created in, and investors will only live in areas with good environmental conditions. This is of key importance in the regeneration of the older urban areas. In addition, environmental protection has spawned whole new industries that have boosted the economy, for example in the north west. Therefore a good environment is essential for sustainable economic development.

Public transport could play a much greater role in reducing the congestion, severance, noise, pollution and climate change gas production associated with private car use, and in breaking the link between economic development and traffic growth. It is therefore essential that the planning system recognises the need to promote the use of public transport, through locational policies and through ensuring that the development process contributes to the funding of public transport infrastructure.

4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?

Netherlands ABC approach

In the Netherlands an approach known as the ABC policy has been developed since the 1980s, which came out from the document 'The Right Business in the Right Place'. It seeks to tackle the growth of out of town and fringe developments and the growth in car dependency and integrate land use planning and transport. Much focus is on public transport nodes and the scarce land available. The city of Utrecht is the model example for its enthusiasm in this policy and on developing a 'compact city'.

The ABC approach classifies types of locations and types of land use into Accessibility Profiles and Mobility Profiles

A locations have excellent public transport links e.g city centre location
B locations have reasonable public transport access and access by car
C locations have excellent road access and are typical car orientated locations

A land uses have high work intensity and include offices, government, Universities
B land uses have some car dependence, including certain retail
C land uses are dependent on road transport and are mainly commercial and industrial.

The ABC approach aims to better match up land uses and type of accessibility. Hand in hand with this is a policy to reduce the amount of parking in A and B locations. This policy aims to make the most of A locations based around public transport interchanges.

The Dutch government have also now launched a 1bn euro fund to redevelop land around key mainline rail stations.

5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms to the English planning system, which are now being implemented? Are they increasing the transparency of the system and providing greater certainty for businesses? What further reforms, if any, are desirable in order to improve the transparency and effectiveness of the system still further?

Local people need to be able to take advantage of the opportunities offered by new employment developments. If these are totally car dependant it reduces the opportunities for people on low incomes to access new job opportunities and therefore does not bring the expected economic benefits. This is particularly important in regeneration schemes. In addition, car dependant schemes are not sustainable in environmental terms

In order to ensure sites are accessible from 'day one', public transport has to be operated at a loss until the development's sites are usually totally built out and operators therefore generally require a subsidy to run services. The Government should therefore be looking at introducing a levy on developers who submit large applications, linked to build out periods, to help cover the initial provision for public transport services for example. This would reduce the burden on the first occupants of sites of providing the full cost of public transport services.

6. Is the planning system sufficiently “joined-up” with other related aspects of government policy? In particular, are Regional Economic Strategies delivering a clear economic framework to help inform Regional Spatial Strategies? Is there sufficient interaction between RDAs and RSSs when preparing their respective regional strategies and if not how might greater interaction be encouraged?

There is a need for transport and land use policies to be more closely integrated, at national and regional level as well as at local level. Spatial planning should be based around public transport accessibility as this integration is vital to the achievement of economic, social and environmental goals. It is important for transport to be considered early on in the planning process rather than as an 'add on'.

The economic growth needed for regeneration and to close the productivity gap between the northern regions and the south east requires major investment in high quality transport infrastructure which is currently lacking. Government departments need to work together to achieve this. In particular, investment in high quality public transport networks is essential if growth is to be achieved without causing unacceptable congestion.

There is also a need to make linkages between the locational policies of the health and education sectors and public transport as sometimes these are actually detrimental to accessibility, such as the centralization of Primary Care Trusts.

At the conurbation level the need to integrate land use and transport policy is complicated by the number of different authorities involved and city region-wide co-operation is needed. Integration is also impeded by the lack of control authorities have over the public transport network: bus services vital to a new development may not be provided by private bus operators and any subsidy from developers has to be negotiated by the local planning authority.

In addition, the planning system does not realize the full economic and social benefits of major infrastructure projects, such as transport projects, and focuses on local issues

The need for developers to produce Transport Assessments for major proposals is to be welcomed but there is also a need to examine the cumulative effects of development proposals and their transport needs and this is sometimes where the system is not adequately 'joined-up' and where there is a need to have stronger links between land-use and transport policies.

There are also difficulties with the current system in relation to the protection of transport alignments. Transport planning is a fairly lengthy process if the costs and benefits of future schemes are properly analysed prior to developing and investing in a new proposal. It is unfortunate therefore that existing alignments such as disused railway lines cannot be protected unless a new scheme is already programmed. This means that appraisal work can be wasted as alignments are often severed by development and therefore cannot be used. It is therefore suggested that the planning system be strengthened in this respect and that alignments are safeguarded so that opportunities for future public transport schemes are not lost.

7. Planning applications for major projects will typically take a considerable to work through all the necessary stages. Do you consider the system puts too much emphasis on speed or do you feel that is too slow? If there is an undue emphasis on speed, what are the negative consequences of this and how could they best be avoided? If the process is too slow, what could be done to overcome delays? In particular, what improvements might be made to the planning appeal system to improve its speed and efficiency?

The emphasis on speed can be detrimental to the quality of a development as quite often there is a need to discuss and negotiate in order to get a satisfactory solution. The PTEs are given a consultation period within which to respond to a planning application but quite often this does not provide enough time to give full consideration to the public transport implications for complicated proposals. There is also often the need to consult public transport operators which also adds time to the consultation process. The planning system should not be speeded up to the detriment of giving due consideration to wider issues such as public transport. More emphasis needs to be placed on pre-application discussions involving agencies such as the PTEs which are useful in enabling problems to be resolved and planning gain to be agreed, prior to submission of a planning application.

8. Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?

Not for PTEs to comment on.

9. To what extent are high occupation costs in England likely to be due to planning constraints, or due to other factors such as imperfect competition or lack of transparency in the land market? What is the economic impact of these costs in terms of the main drivers of productivity?

Not for PTEs to comment on.

10. How does the planning system impact on competition, through influencing barriers to entry and exit and economies or scale? If there are areas where there is a negative impact, how can these be addressed, while protecting other goals of the planning system?

Not for PTEs to comment on.

11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?

Not for PTEs to comment on.

12. Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?

One of the ways in which to promote sustainable development is to ensure that new sites are accessible by public transport before development takes place or at least before it is occupied. Due to the deregulation of public transport and the length of time it takes to put public transport facilities in place, particularly in the case of light rail systems, it is difficult to plan new developments and transport together. Not all planning authorities have the resources or skills to deal with public transport issues. Joint working with PTEs can be beneficial in this respect

13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?

Whilst the intentions for stakeholder involvement are admirable the processes are cumbersome and there is certainly a feeling of consultation overload.

14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?

Not for the PTE to comment on.

15. Economic development can help achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?

Not for the PTE to comment on.

Closing remarks

We trust these comments are helpful in informing the Government's development of its thinking about reforms to the Land Use Planning system. We would be happy to elaborate further on these views if this would assist. Please contact Tim Larner, Director, pteg Support Unit (tim.larner@pteg.net), if further elaboration of our views is required.