



Submission to the Independent Review of the Scottish Planning system by SEStran

Introduction

SEStran is the statutory Regional Transport Partnership (RTP) covering the south east of Scotland. It comprises eight constituent local authorities: Clackmannanshire, the City of Edinburgh, East Lothian, Falkirk, Fife, Midlothian, the Scottish Borders and West Lothian.

SEStran welcomes the opportunity to contribute to the deliberations of the Independent panel. The Partnership has always recognised the crucial interaction between transport policy and land use planning in achieving economic, social and environmental goals for the area, and the Regional Transport Strategy (refreshed in July 2015) highlights this. This is of particular importance in the Edinburgh city region, where substantial increases in population and households are forecast over the next 20 years with consequent impacts on travel patterns.

In practical terms, SEStran has worked closely with SESplan, the Strategic Development Planning Authority, on the preparation and review of the Strategic Development Plan (SDP). It should be noted however that the SESplan boundary is not coterminous with that of SEStran, excluding Clackmannanshire, Falkirk and NE Fife.

Q1 Development Planning

SEStran is generally supportive of the principles of the development planning system, and of the two-tier approach for the major city-regions. The need for a regional perspective is essential to ensure effective transport provision as well as the appropriate allocation of development land. City-regions function as single economic units; effective planning at this level is necessary to ensure that economic development potential of these areas is maximised.

The system as it stands has a number of weaknesses in relation to the linkages with transport issues:

a) Regional transport governance

While RTPs are charged with the preparation of a Regional Transport Strategy, funding for transport investment since 2010 is directed to local authorities and Transport Scotland. RTPs (other than Strathclyde) have to rely primarily on a lobbying/co-ordinating role rather than directly determining investment priorities.

This can result in potential cross-boundary interventions not being adequately considered. The consequence is that strategic transport has become primarily the role of national government, in the form of Transport Scotland. There is then a further conflict between the priorities given to national transport priorities - the trunk road network in particular - and the needs for transport investment linked to the development of the city-region.

b) Linkage between RTS and SDP

The previous comments are exacerbated by weak linkages between the RTS and the SDP, particularly in relation to timescale and the co-ordination of investment priorities. Since the RTS can no longer include an investment plan (other than setting out what other agencies may propose), its content

cannot be directly related to the SDP. There is also no legislation or guidance relating to the frequency of update of RTSs. In the case of SEStran, an RTS refresh (rather than review from first principles) has been completed in 2015, 7 years after the original publication.

Significant transport appraisal work is currently being undertaken jointly by Transport Scotland, SESplan and SEStran to review the strategic cross-boundary transport implications of the first SESplan SDP (approved June 2013). This is taking place in parallel to the preparation by SESplan of SDP2 but is not directly linked to it. As a result, considerable difficulties are arising in ensuring that an acceptable (to government) appraisal of SDP2 is completed within the statutory timescale for the plan.

The key issue is that the transport forecasting work required to identify and appraise future transport requirements for both new development and other underlying transport and socio-demographic trends in a major city-region is complex, requires substantial resources and takes several years. This does not fit easily with the 5 year refresh cycle required for an SDP.

c) Transport consideration in the SDP system currently

Currently, guidance suggests that SDPs should:

- Have regard to regional/local transport strategies (Circular 6/2013)
- Include appraisal of the cumulative impact of the proposed land uses (TS Transport Appraisal Guidance)

However, in congested urban areas, the location of new development can have a major impact on peoples transport mode choices and hence on growth of traffic and potential intensification of already serious congestion problems. Consideration of transport impacts should therefore start at the earliest stages of plan preparation.

In the case of the SESplan SDP, this was done by developing an overall locational strategy based on maximising opportunities for public transport use, and carrying out accessibility analysis of potential development areas. It would be beneficial for such an approach to be a core element of SDP preparation. The aim should be to ensure that development takes place in such a way as to minimise the impact on the transport system and consequent investment that may be required to accommodate it.

The focus of transport appraisal has however been on the impact of the final plan, rather than on whether this is the most efficient plan in transport terms. This raises a number of issues:

- It may be difficult to carry out in parallel with the plan development process because of the timescales required to carry out the necessary transport model forecasting work;
- There is a mismatch between the non-specific nature of land allocations in an SDP and the need for geographically specific data to feed into a transport modelling exercise;
- If appraisal work post plan development shows the need for major interventions, the deliverability of the plan may come into question at a late stage in its development.

In summary – a more integrated approach between SDP preparation and transport forecasting and appraisal is required. This may require a change to the planning cycle, resource inputs and geographical boundaries.

d) Designing places

SDPs have been confined to setting out general areas for future development. However, travel patterns and choices will be significantly affected by the form of development: issues such as density, street patterns, linkages to public transport hubs and other services will all affect how people choose to travel. SDPs should be able to set masterplanning principles that ensure new development is built in a form that supports the wider aims of SDPs and RTSS.

This is particularly crucial in the 'peri-urban' areas around major cities where car use is already high and trends towards car dependency are increasing further.

e) Freight and logistics

Freight and logistics issues are often not given sufficient consideration in both transport and land use planning processes at local and regional level. The National Planning Framework does include freight issues, however. There is a need to improve understanding of the relationship between development and freight movement, ways of achieving more sustainable logistics and the land use requirements of freight terminals and hubs.

A lead could be given through government providing a revised strategic overview of freight/logistics policy for Scotland – the last one was published in 2006 (Freight Action Plan for Scotland). The 2015 report into Freight Transport produced by the Infrastructure and Capital Investment Committee of the Scottish Parliament recommends and provides the basis for such a review.

Q3 Planning for infrastructure

A more integrated link between strategic spatial planning and transport planning as suggested in response to Q1 would assist a more coherent approach to developing priorities for transport interventions at the regional level.

This can only be done in partnership with government (Transport Scotland). There is a need to improve the alignment between national investment priorities (as set out in NPF3, the Strategic Transport Projects Review 2009 (STPR) and Infrastructure Investment Plan) and strategic regional and local needs.

Developer contributions are a mechanism to obtain some contribution towards the funding of strategic infrastructure where this is linked to additional demand generated by development. Greater clarity in the legislation surrounding developer contributions towards strategic infrastructure would assist (review of Circular 3/2012).

Developer contributions can only be seen as a contributory element to an overall funding package: a more integrated approach to development and funding of a city-region transport investment programme is also necessary. Ideally, a programme setting out all the strategic interventions proposed and the scale of inputs from various sources (Developer contributions, City Deal, Scottish Futures Trust, direct Scottish Government funding) would be linked to the SDP.