

15 June 2007

Ms Sandra Carey
Scottish Executive
Planning Division
Victoria Quay
Edinburgh
EH6 6QQ

Our ref: PDU0453/0435LBK
Your ref: POL/6208
Direct Dial 0141-333-3470
Direct fax: 0141-333-3284
Email: rodney.mortimer@spt.co.uk

Dear Ms Carey

Response to Scottish Executive Consultation on Statutory Guidance on Planning and Sustainable Development

Strathclyde Partnership for Transport (SPT) would like to thank the Scottish Executive for this opportunity to comment on the Statutory Guidance on Planning and Sustainable Development. SPT are, in principle, supportive of the draft Statutory Guidance. We do, however, have a number of comments on points raised in the consultation paper. These are available in Appendix A.

SPT is committed to the principles of sustainable development. Our final draft Regional Transport Strategy (RTS) for the west of Scotland 2007-2021, "A Catalyst for Change", submitted to Scottish Ministers for approval in March 2007, affirms this commitment. Our Strategy Vision is of:

"a world-class, sustainable transport system that acts as a catalyst for an improved quality of life for all".

One of the Shared Goals of the Strategy is to:

improve health and protect the environment, by minimising emissions and consumption of resources and energy, by promoting active travel, quality public transport and modal shift.

Two of our Strategy Objectives further emphasise SPT's commitment to more sustainable transport use and the better integration of transport and land-use planning:

Environment and Health: to improve health and protect the environment by minimising emissions and consumption of resources and energy by the transport system

Economy, Transport and Land-use Planning: to support land-use planning strategies, regeneration and development by integrating transport provision

A range of initiatives supporting these are included in the Strategy, for example, improving walking and cycling facilities, managing travel demand through encouraging more sustainable travel behaviour (Smarter Choices), and modal shift to more sustainable modes. Further to this, SPT is developing an Action Plan on improving the integration of transport planning and land-use planning, including initiatives such as web-based portal offering transport planning advice to land-use planners in both the private and public sector.

SPT has already made significant progress in encouraging more sustainable travel behaviour. For example, In 2006 we were awarded funding from the Scottish Executive to develop and implement travel plans. This funding has been used to help fund travel plan officers who work closely with member councils, health boards and other organisations to help deliver their travel plans. To complement this work, a sustainable travel grant scheme has been developed. This allows local authorities, health boards and other organisations to apply for a match funding grant. SPT travel plan officers have also recently completed a travel plan for SPT.

If you have any queries regarding our comments, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rodney Mortimer', written in a cursive style.

Rodney Mortimer
Director Policy and Strategy

Enc Appendix A

cc

APPENDIX A

Paragraph	SPT comment
3	We would welcome more detailed clarification on the anticipated status of the Statutory Guidance, for example, in relation to SPP's.
10	We are supportive of these objectives for planning.
13	We would recommend that clarification on the status and positive value of Sustainability Appraisal is given in this section. We would also recommend that reference is made to Scottish Transport Appraisal Guidance (STAG) in this section, as transport PPSs are subject to both STAG and SEA.
15-17	SPT are, in principle, supportive of the aims of the Planning etc. (Scotland) Act 2006 and the aims of the National Planning Framework. We are supportive of the points made in these paragraphs, particularly with reference to the 4 objectives of modernisation for planning, the emphasis on meaningful consultation with stakeholders, and the need for inclusive, transparent, and accountable decision-making
20	We seek clarification on the points made in this paragraph. The example provided could be construed as encouraging unsustainable behaviour provided it is acknowledged. A more positive emphasis on the economic and social benefits of encouraging more sustainable behaviour in development is recommended.
23	We welcome the inclusion of "Planning and Transport" in this section. We also welcome and support the statement that "the link between planning and transport is absolutely critical".
25	We seek clarification as to whether "Planning and Transport" is one of the General Principles, as it is contained in the overall section, but this paragraph suggests that it is not one of the 5 principles. Furthermore, given that the other General Principles are action-orientated, it is recommended that consideration is given to applying the same criteria to "Planning and Transport", for example, "Improving links between land-use and transport planning".
26-30	We are supportive of the 5 principles in these paragraphs. We would however, recommend including greater emphasis on the contribution more sustainable transport behaviour can have to the principles, in particular the contribution of the National Transport Strategy, RTSs and Local Transport Strategies, and STAG.
30	We are supportive of this principle, and would ask the Scottish Executive to note that Regional Transport Partnerships have undertaken SEAs on their RTSs and are therefore in a position to provide advice on environmental impacts of transport in their respective regions, and recommend that reference is made to this in the Statutory Guidance.
31	We seek clarification with regard to the position of updating relevant SPPs to take account of the Statutory Guidance.
33	We strongly support the statement that "A key challenge for planning is to promote new development and support regeneration in locations that are, or can be made, sustainable. This challenge, which is principally achieved through proper

	integration of planning and transport, is a key role for development plans". Given the statutory nature of RTSs (under the Transport (Scotland) Act 2005), we would strongly recommend that reference be made to RTSs in this section. Furthermore, given the acknowledgement of the importance of ensuring sustainable transport options are considered in locating developments, we would welcome further discussions with the Scottish Executive on conferring "Statutory Consultee" status on SPT (and other RTPs) with regard to developments of a regional nature, through secondary legislation.
35, first bullet point	We support the point made in this section, and would recommend emphasising the importance of effective liaison and partnership working between land-use planners and transport planners regarding future capacity of existing (and potentially, new) transport infrastructure.
35, second bullet point	We welcome the emphasis in this section on ensuring that, in deciding the location of urban regeneration sites, the "scope to introduce new or improved transport links, to allow for access by a range of forms of transport and avoid reinforcing old, unsustainable patterns of travel" is taken into account, and would refer the Scottish Executive to the answer given for paragraph 33 above in this regard.
35, third bullet point	We welcome that, in locating new rural developments or regeneration, transport considerations be taken into account. However, with regard to the statement that "these considerations will have to be balanced against location where lengthy journeys by private car are inevitable while recognising the contribution development can make to sustaining rural communities", we seek clarification on weighting this balance, and would strongly recommend that this weighting is arrived at through the equal contribution and partnership working of both transport planners and land-use planners. On a regional level, RTPs would be able to advise in this regard.
35, fourth bullet point	We strongly support this section. We would however, recommend inclusion of a statement to the effect that where suitable public transport does not exist for a development, that the developer should provide, or should consider providing it, in partnership with others. We also recommend, that in creating layouts for new developments, greater provision of routes for more sustainable modes (walking, cycling etc) and for the facilitation of these is made.
35, fourteenth bullet point	We strongly support this section. However, we would recommend that reference is also made mitigating the effects of noise and vibration pollution from developments. We also suggest inclusion of a recommendation to undertake Health Impact Assessments as required for new developments.
35, fifteenth bullet point	We strongly support this section, and refer the Scottish Executive to our answer at "35, first bullet point" above. We strongly support "effective liaison and dialogue with service providers which may be helped by a formal protocol or service agreement", and suggest there is the potential for this to include water, sewage, and utilities provision as well as transport. SPT would be

	pleased to assist the Scottish Executive in developing these protocols and service agreements.
37, first bullet point	We support the need for good sustainable transport accessibility to developments, and to public transport routes. We would however, recommend that the Scottish Executive includes reference to RTs, which are statutory documents, and Local Transport Strategies in this section.
38	We welcome the inclusion of a reference to green travel plans in this section, though would recommend an increase in emphasis of the positive benefits of travel planning to an organisation and that sufficient resources are allocated to ensure effective monitoring of the implementation of travel plans. National guidance on financial penalties/bonds for not implementing travel plans would be welcomed.
40 – 41	We would strongly recommend the inclusion of a reference to RTs/LTs in this section, given earlier emphasis on the importance of integrating transport and land-use planning.
45	We would recommend clarification and a firm commitment from the Statutory Guidance that creating Sustainability Standards for a Development Plan is advisable.
50	Given the emphasis placed on the contribution of transport to sustainable development throughout the Statutory Guidance, and the statutory nature of the RTs, we would strongly recommend the inclusion of RTPs in the list of agencies likely to be statutory consultees, and would be happy to discuss this further with the Scottish Executive.
51 – 52	As stated above in the comments on paragraph 3, there is a need for clarification of the anticipated status of the Statutory Guidance. Furthermore, the need for closer integration of transport and land-use planning to achieve sustainable outcomes should be strongly emphasised.

RESPONDEE INFORMATION FORM: Draft Statutory Guidance on Planning and Sustainable Development

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name: STRATHCLYDE PARTNERSHIP FOR TRANSPORT

Postal Address: CONSORT HOUSE, 12 WEST GEORGE ST, GLASGOW G2 1HN

1. Are you responding as: (please tick one box)

- (a) an individual go to Q2a/b and then Q4
(b) **on behalf of** a group or organisation go to Q3 and then Q4

INDIVIDUALS

2a. Do you agree to your response being made available to the public (in the Scottish Executive library and/or on the Scottish Executive website)?

- Yes (go to 2b below)
No, not at all We will treat your response as confidential

2b. Where *confidentiality is not requested*, we will make your response available to the public on the following basis (**please tick one** of the following boxes)

- Yes, make my response, name and address all available
Yes, make my response available, but not my name or address
Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

3. Your name and address of your organisation *will be* made available to the public (in the Scottish Executive library and/or on Scottish Executive website). Are you content for your response to be made available?

- Yes
No We will treat your response as confidential

SHARING RESPONSES/FUTURE ENGAGEMENT

4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future for consultation or research purposes?

- Yes
No