



Scottish Government consultation on Draft Planning Delivery Advice on Housing and Infrastructure – SPT response

Committee Strategy and Programmes

Date of meeting 20 May 2016

Date of report 25 April 2016

Report by Assistant Chief Executive (Operations)

1. Object of report

To recommend approval of SPT's draft response to the Scottish Government's consultation on Draft Planning Delivery Advice on Housing and Infrastructure. The response, attached at Appendix 1, was submitted within deadline on 30 March 2016 subject to Committee approval.

2. Background

The Scottish Government (SG) published the Draft Planning Delivery Advice on Housing and Infrastructure on 17 February 2016 seeking comments by 31 March 2016. The SG note that the main purpose of the advice once finalised will be to assist in the preparation of development plans and highlight the key messages of the Advice as being: achieving delivery through joint working and engagement and greater clarity on housing and infrastructure requirements within development plans and Action Programmes. PAN 2/2010: Affordable Housing and Housing Land Audits remains in place until the draft advice has been finalised.

3. Outline of proposals

- 3.1 As a statutory 'key agency' in the Development Planning process, SPT works with Clydeplan and our constituent councils to ensure there is alignment between the policies and plans set out in the Strategic Development Plan (SDP), the respective Local Development Plans (LDPs) and the statutory Regional Transport Strategy.
- 3.2 As part of this process, SPT provides transport planning advice including accessibility analysis to our twelve constituent council planning authorities in order to help them develop their LDPs, and works closely with Clydeplan on the SDP. This is essential in helping to ensure that development plans promote sustainable development by promoting effective transport arrangements including making best use of existing infrastructure and services.
- 3.3 The provision and delivery of housing drives and is driven by the way communities develop and fundamentally affects the provision of a range of services, and therefore it is vital that planning for housing and related allocations of land are not considered in isolation. An integrated, co-ordinated and strategic approach to planning is essential.

3.4 Therefore in principle, SPT welcomes the Draft Planning Delivery Advice. The key points of our draft response – attached at Appendix 1 - are below:

- It will be critical to ensure that this Advice is in tune with the emerging Independent Review of Planning, particularly since the latter raises questions over the appropriateness of the development plan model currently at the heart of Scotland's planning system.
- A key challenge will be ensuring that there is sufficient funding available to meet the transport infrastructure requirements emerging from an increased promotion of new housing. SPT's capital budget for transport has been reduced between 2015/16 and 2016/17 and this makes the challenge of meeting national commitments on carbon reduction and air quality all the more difficult. There is therefore a potential disconnect between public policy aspirations and the practical reality of funding on the ground.
- SPT supports the principle of developer contributions towards the often considerable costs of transport services and infrastructure, both capital and revenue. SPT would support a review of current arrangements, including the scope for a more strategic approach to funding, provided such a review maintained the principle of developer contributions in some form.
- The challenges and opportunities provided by the Community Empowerment Act will need to be given very serious consideration in developing the Advice as will the requirement to ensure effective alignment across policy e.g. SDP/LDP/Regional Transport Strategy/Single Outcome Agreements/City Deals.
- SPT supports the principle of "front loading" since this enables better consideration of development sites at the earliest stage. However, and while we recognise the potential efficiencies that early engagement delivers, this does present very real challenges in terms of resourcing the process, both in terms of available staff resources but also in relation to experience and expertise. Ensuring the availability of such resources will be critical to the success of ensuring development plans that deliver.
- Whilst acknowledging the very real and pressing need to promote increased housing provision, SPT would be concerned if a consequence of refreshed Advice was the development of sites in less sustainable locations rather than sites on more sustainable brownfield land.
- SPT responds to planning applications for development sites including, where possible, advising on appropriate provision of sustainable transport options. In SPT's response we have noted that where our advice is not taken on board we would reserve the right to decline a subsequent request for public subsidy.
- Central to future success in planning for infrastructure is proactive, early and interactive discussion between all parties in terms of identifying infrastructure/service requirements. Specifically in terms of transport, strategic and local infrastructure constraints need to be identified and appropriately addressed to ensure that development doesn't have a cumulative negative impact on the transport network to the extent that the overall efficiency of the network is undermined.

4. Conclusions

As emphasised in our response, it is essential that the future planning of housing and infrastructure considers transport implications at an early stage and that it continues to be taken account of as development progresses. SPT has taken a proactive stance in this regard with councils, Clydeplan and others, and will continue to do so in future, through initiatives such as the Strathclyde Bus Alliance, which is the subject of a separate paper to this Committee. Officers will continue to work with other organisations to seek assurances that SPT's views are taken account as the Advice is finalised.

5. Committee action

The Committee is recommended to approve SPT's draft response attached at Appendix 1.

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>
Equalities consequences	<i>None at present.</i>
Risk consequences	<i>None at present.</i>

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APPENDIX 1

Scottish Government Consultation on Draft Planning Delivery Advice on Housing and Infrastructure – SPT response.

SPT is the Regional Transport Partnership for the west of Scotland, a partnership of twelve constituent councils and our area includes the eight constituent councils who comprise the Clydeplan area.

As a key agency, SPT works with Clydeplan and our constituent councils to ensure there is alignment between the policies and plans set out in the Strategic Development Plan and the respective Local Development Plans and the statutory Regional Transport Partnership.

As part of this process SPT provides transport planning advice including accessibility analysis on behalf of our twelve constituent council planning authorities in developing their local development plans. This is critical to help ensure that development plans promote sustainable development by promoting effective transport arrangements including making best use of existing infrastructure and services.

The provision and delivery of housing drives and is driven by the way communities develop and fundamentally affects the provision of a range of services and therefore it is vital that planning for housing and related allocations of land are not considered in isolation. An integrated, co-ordinated and, where appropriate, strategic approach to planning is essential.

SPT welcomes this draft Planning Advice and we would offer the following comments which we hope will be helpful in ensuring it is robust and practical to implement.

- It will be critical to ensure that this Advice is in tune with the emerging Independent Review of Planning, particularly since the latter raises questions over the appropriateness of the development plan model at the heart of the planning system.
- A key challenge will be ensuring that there is sufficient funding available to meet the transport infrastructure requirements emerging from an increased promotion of new housing. SPT's capital budget for transport has been reduced between 2015/16 and 2016/17 and this makes the challenge of meeting national commitments on carbon reduction and air quality all the more difficult. There is therefore a potential disconnect between public policy aspirations and the practical reality of funding on the ground.
- SPT supports the principle of developer contributions towards the considerable costs of transport and other infrastructure provision. SPT would support a review of current arrangements, including the scope for a more strategic approach to funding, provided such a review maintained the principle of developer contributions in some form (see also our comments at paragraph 107).
- The challenges and opportunities provided by the Community Empowerment Act will need to be given very serious consideration as will the requirement to ensure effective alignment across policy e.g. SDP / LDP / Regional Transport Strategy / Single Outcome Agreements / City Deals.
- SPT supports the principle of “front loading” since this enables better consideration of development sites at the earliest stage. However, and while we recognise the potential

efficiencies that early engagement delivers, this does present very real challenges in terms of resourcing the process, both in terms of available staff resources but also in relation to experience and expertise. Ensuring the availability of such resources will be critical to the success of ensuring development plans that deliver.

- Whilst acknowledging the very real and pressing need to promote increased housing provision, SPT would be concerned if a consequence of refreshed Advice was the development of sites in less sustainable locations rather than sites on more sustainable brownfield land.
- Central to future success in planning for infrastructure is proactive, early and interactive discussion between all parties in terms of identifying infrastructure / service requirements. Specifically in terms of transport, strategic and local infrastructure constraints need to be identified and appropriately addressed to ensure that development doesn't have a cumulative negative impact on the transport network to the extent that the overall efficiency of the network is undermined.

Specific points as follows:

- Paragraph 18: While we support the principle of close alignment between Strategic and Local Development Plans, the tone of the language used here is quite harsh e.g. 'little or no debate' and does not allow for any flexibility. This tone could be softened to emphasis agreement and alignment rather than highlighting a rigid approach.
- Paragraph 34: The requirement for a generous margin to be added to the housing Supply Target could result in the favouring of development sites which are less rather than more sustainable.
- Paragraph 46: We welcome proposals to strengthen the links between development planning and community planning and that where practical this should be done by through combined engagement rather than duplicated effort.
- Paragraph 48: We welcome efforts to promote more town centre residential development as this works well with existing transport networks and avoids development on green field land which often requires additional public transport investment which may not prove to be sustainable in the longer term.
- Para 49: Refers to sectors broadly defined as market and affordable. While these terms encompass the socially rented sector, a more explicit reference to social housing would be welcome here.
- Para 88: Will developers be prepared to share cost information as implied or will this be considered to be commercially confidential? This is important since it provides a benchmark upon which to, partially, at least, consider appropriate developer contributions. If this information is not forthcoming it makes the job of considering appropriate contributions more difficult.
- Para 90: This paragraph states that "In some cases, the infrastructure needs of communities will be identified through community planning, and therefore a strong link with

the development plan is important.” It will be very important to understand and provide guidance on what the precise role and expectations will be on community planning partnerships. There must be limits on what community planning can and should be expected to do in this regard.

- Whereas Strategic Development Plans and Regional Transport Strategies have due regard to likely levels of future funding, it is not clear how Community Planning Partnerships would be bound by such considerations without clear guidance. The danger here is that CPPs would prepare undeliverable lists of infrastructure requirements which in turn would lead to unreasonable public expectations. This area will need to be carefully considered in the final Advice and reflected in future advice to CPPs. Any guidance must reflect current statutory responsibilities of Regional Transport Strategies and their forward programmes in addition to the policies established in SDPs and LDPs.
- Para 92: We welcome the suggestion that SDPs should identify infrastructure (including transport infrastructure) that cross local authority boundaries or have cross boundary significance.
- Figure 2: Given the extent of funding made available, a reference to Regional Transport Partnerships would be welcome under the Active Travel box.
- Para: 98: Reference to Planning authorities working with Regional Transport Partnerships would be welcome here.
- Para 102: Para 102 makes a good point that infrastructure need and timing can be hard to predict.
- Para 102: The proposed Infrastructure Working Groups should include representation from Regional Transport Partnerships.
- Para 107: This may be dependent on the outcomes of the Independent Review of Planning and also any potential review of the current arrangements for developer contributions. It may be that a future contribution model would not be tied to a locality adjacent to a specific development. An alternative contribution model might encompass the wider benefits of transport investment e.g. a tax on development with the proceeds available for transport funding but with a more flexible approach to where those proceeds might be invested.
- Appendix 1, Para 3: The reference to Local authority Roads and Planning Departments working closer together is welcome but further work will be required to ensure that public transport requirements are similarly considered as part of the consultation process.
- Appendix 1, Page 29, second box: While the approach to aligning roads construction consents with planning permission is welcome, a mention here of public transport and active travel would be welcome.
- Appendix 1, Para 5: Identifying potential developer contributions associated with future transport infrastructure requirements will be complex given the often phased nature of e.g. housing developments.

- Appendix 1, Para 6: In appraising the impact of the Spatial Strategy on the transport network, planning authorities should also liaise closely with their respective Regional Transport Partnerships.
- Appendix 1, Paras 32 and 36: New and or rationalised healthcare facilities have significant implications for public transport access. These are often not given sufficient attention in the planning process and the costs of additional transport provision are not reflected in planning decisions. More emphasis on the costs of development on the transport network needs to be built in to the process and an appreciation that public transport does not simply follow on from a consent. SPT responds to planning applications for development sites including hospitals and health centres advising on appropriate provision of sustainable transport options. Where our advice is not taken on board we would reserve the right to decline a subsequent request for public subsidy.
- Annexe E, Page 64: Reference to engagement with Regional Transport Partnerships is welcome. It is worth noting that SPT and Transport Scotland are currently collaborating on the development of a new strategic transport model for the west of Scotland.
- Annexe E, Page 66, Call for Sites / Preparing the Main Issues Report (MIR): We would welcome reference to Regional Transport Strategies at paragraphs 2 and 6. The references in bullets here are more appropriately answered in liaison with Regional Transport Partnerships.
- Annexe E, Page 67: In addition to Transport Scotland we would welcome specific references to SPT at first and third bullet points in terms of the west of Scotland.
- Annexe E, Page 68: At the fourth bullet there should be a specific reference to RTPs given their Key Agency status.
- Annexe E: In general terms we would welcome a more explicit reference to SPT in relation to the planning, coordination and procurement of bus services which are significant, particularly in relation to housing developments but also healthcare and educational facilities. We would also welcome greater recognition in Annexe E of the importance of a regional transport perspective on the planning decisions about housing and infrastructure. As noted previously in relation to Appendix 1, Paras 32 and 36, SPT where SPT's advice is not taken on board in response to a particular development application we would reserve the right to decline a subsequent request for public subsidy.

SPT welcomes the opportunity to respond to this consultation and we would be happy to clarify or expand on the points raised.