



FINAL

Informal Consultation

National Planning Policy Framework

pteg response

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1. Introduction

- 1.1. **pteg** represents the six Passenger Transport Executives (PTEs) in England and through them the travelling public in the city regions. The PTEs provide, plan, procure and promote public transport in six of England's largest conurbations; Merseyside (Merseytravel), West Midlands (Centro), Tyne and Wear (Nexus), West Yorkshire (Metro), Greater Manchester (GMPTE) and South Yorkshire (SYLTE). Transport for London, Leicester City Council, Nottingham City Council and Strathclyde Partnership for Transport are associate members of **pteg**. This response is on behalf of the six PTEs only.
- 1.2. The PTEs operate at the level of the city regions, reflecting the relevant functional economic area, and they believe that this is the optimum strategic level for the provision of urban transport. They are fully accountable, reporting into Integrated Transport Authorities (ITAs) which are composed of elected representatives of the local authorities in the areas they serve. PTEs support the ITAs in the development and delivery of Local Transport Plans.
- 1.3. Good transport is important to the economic success of major cities and their travel to work areas (as recognised by the Eddington Study 2006). Conversely, congestion is a real cost to business and poor accessibility can constrain growth and regeneration. Well planned transport therefore plays a vital role in contributing to regeneration, economic growth and productivity. Good connectivity enables access to jobs, education, recreation, health and social inclusion. Transport can also contribute significantly to the low carbon agenda.
- 1.4. We welcome the opportunity to input into this informal consultation on the proposed National Planning Policy Framework (NPPF). We believe that it is important to clearly set out the aims of the NPPF and to relate the proposed streamlining of regulations to the aims of the planning system. We look forward to commenting on the NPPF when it is issued. For us this is particularly important as it can help set the context for better integration of local transport and land use planning if implemented properly.

2. The purpose of a NPPF

- 2.1. The Government has stated that the NPPF will consolidate the existing statements and guidance into a single document, which is
 - localist in its approach;
 - used as a mechanism for delivering Government's objectives, where it is relevant to do so; and
 - user-friendly and accessible to provide clear guidance for local decision-making
- 2.2. At a fundamental level, the Government needs to define clearly its expectations for the planning system in regulating and managing development through the NPPF, including a clear definition of sustainable development, building on PPS1 'Planning for Sustainable Development'. By setting out the role of planning and how it can be delivered (i.e. through sustainable development), the structure and detail of the NPPF will be made easier to interpret and facilitate better quality decision-making.
- 2.3. In consolidating existing guidance and regulations, the NPPF should not undermine the plan-led system and spatial planning approach. A presumption in favour of sustainable development also should not undermine the plan-led systems and safeguards and criteria,

must be referred to in applying the presumption in favour of sustainable development in the absence of an up to date local development plan.

- 2.4. The NPPF will be the framework for decision-making on planning matters, and as such it needs to be clear on the interplay between decisions at different spatial levels (i.e. national, sub-regional, local, and neighbourhood) and between different parts of the planning system. The Major Infrastructure Planning Reform Work Plan currently being implemented will also have a bearing on these matters.
- 2.5. The ITAs currently have responsibility for the preparation of the Local Transport Plans (LTPs) for the city regions, with the PTEs responsible for delivering the policies contained within them. With the removal of Regional Strategies, the LTPs will be the only remaining statutory policy framework covering the sub regional level. Local Transport Plans must therefore be acknowledged within the NPPF, with their role alongside the planning process, how they are aligned with National Planning Statements, Local Development Frameworks, and Neighbourhood Plans set out clearly. The NPPF should seek to make sure that there is consistency between LTPs and Core Strategies of LDFs.
- 2.6. In particular, the NPPF should articulate how Local Enterprise Partnerships interact with the planning process. Whilst accepting that not all LEPs will seek to input into the planning process, it will be necessary to set out their role as far as can be detailed and how LEP views should be taken into account.

3. Content of a NPPF

- 3.1. The NPPF should be the policy mechanism for delivering national priorities, including National Planning Statements (NPS). The NPPF therefore needs to set out clearly the role of the NPS in relation to the decision-making framework. For example, how are local authorities to take account of NPS in planning decisions and in drafting local development plans?
- 3.2. The NPPF should provide sufficient guidance to allow local decision-making and therefore there is a role for proper guidance and regulation to assist decision-makers.
- 3.3. We would expect transport to be a key policy area addressed in the NPPF due to its strategic role and the nature of transport networks. Critically, it is important for the NPPF to recognise the linkages between land use and transport planning, in order to:
 - Reduce the need to travel
 - Promote sustainable transport modes by facilitating more cycling and walking and improved accessibility to public transport
 - Take account of traffic and the impact on congestion generated by development
 - Make sure that people can access opportunities for work, education, health and leisure, regardless of whether they have access to a car
 - Improve transport's contribution to a low carbon society
 - Promote public health
- 3.4. It is clear that in attempting to rationalise a large amount of existing guidance into one document, care should be taken to keep the best parts of the existing framework and build from them. We believe that the NPF should provide a clear framework for decision-makers

and we would urge that the positive impacts of guidance such as PPS 13 'Transport' are taken into account. Key areas include:

- a. PPG13 contains the statutory requirements for Transport Assessments and Travel Plans which are essential documents for assessing impacts on public transport when considering proposals for development. Transport Assessments (TA) and Travel Plans (TP) help quantify and create the evidence for making decisions on how much impact a development will have on the highway and public transport network. They also provide recommendations as to identify what and how much mitigation is required. PTEs rely on the national policy to ensure that major developments produce a TA/TP as these allow LPAs and PTEs to use this evidence in support from increased infrastructure requirements and travel planning techniques.
- b. PPG13 also contains useful sections on the links between land use and transport (para 20) as well as circumstances when planning obligations may be sought to contribute towards improvements to public transport (paras 83-86). These are particularly useful when making the case that new development should strengthen the existing public transport network rather than retrofitting the network around poorly-located development. The location of new development will be a key factor on a new development's sustainability and national policy must enforce the geographic aspect. Placing new development in sustainable locations will maximise existing resource and ensure access to employment, education, leisure and health through sustainable travel options.
- c. The use of mixed use developments can dramatically reduce the need to travel and encourage healthier and sustainable travel choices for local short trips. Although we are aware that this does not necessarily generate lower car use, it provides the diversity of development to ensure that residents have a choice.
- d. PPS3 contains useful guidance on efficient use of land (paras 45-51) outlining that *"...Local Planning Authorities should develop housing density policies having regard to: The current and future level and capacity of infrastructure..."* This is particularly useful for ITAs when engaging with local authorities on emerging planning policies to ensure that public transport networks will be sustained over time.
- e. Engagement in the pre-application/pre-consultation processes are not explicitly referenced in PPG13, but feature in various other PPGs and PPSs. This has also been recognised in the Localism Bill. Engagement with PTEs, transport providers and other related bodies is vitally important when dealing with major planning applications. The NPPF needs to reflect the importance of engagement with relevant organisations during pre-application and pre consultation on planning policies.

4. Addressing the role of ITAs and PTEs

- 4.1. ITAs and PTEs have a major role to play in ensuring that transport and land use planning can be coordinated. The importance of coordinating transport and land use planning was recognised in the DfT's Local Transport White Paper:

'Land use planning is critical to transport. Where places (e.g. shops, work and other services) are located in relation to where people live is a significant factor in determining how much people need or want to travel. It is vital that sustainable transport is a central consideration

from the early stages of local planning - for example whenever new houses or retail areas are being developed.'

- 4.2. A weakness of the current system is that bodies that hold statutory responsibilities for part of the wider planning process (such as ITAs and PTEs) are not statutory consultees for major planning applications such as for sports stadiums, shopping centres and major housing developments. In a time of reducing regulation, we believe it is ever more critical that ITAs/ PTEs are made statutory consultees.
- 4.3. Statutory consultee status would allow the ITAs/ PTEs to have a clear role in the planning of development and promote them as a stronger, more informed and ultimately more accountable organisation. It would allow us to make sure that the strategic transport implications of any such developments are fully considered, in terms of both their direct access requirements and their implications for the wider transport network.
- 4.4. For example, ITAs have a statutory requirement to produce Local Transport Plans and yet, are not a recognised statutory consultee in the planning process. Without being statutory consultees, comments provided by ITAs through the planning process could effectively be overridden by comments provided by another statutory party despite the fact the ITAs produce a statutory document.
- 4.5. The non-statutory status of ITAs also means that promoters of new development are not obliged to engage with ITAs about their proposals prior to proposals being considered by a local authority. This can mean that the implications for public transport resultant from a new development are considered too late in the process and the objectives of paragraph 20 of PPG13 (as mentioned above) are disregarded. In such cases, integration to the public transport network is considered retrospectively which is not preferable
- 4.6. More generally statutory consultee status would:
 - Formalises the role ITAs/ PTEs are currently fulfilling;
 - Increased influence over planning conditions will potentially increase our influence with transport operators;
 - Greater influence on wider issues that are not directly related public transport but have an impact on travel behaviour (e.g. healthcare and school spatial strategies);
 - Increases the importance of the successful implementation of LTP3.
 - Provides PTEs with further opportunity for promoting land use and transport integration, developer contributions and policy building of the LDF;
 - Allows good precedents to be set and adhered to for future evidence; and
 - Strengthens the weight of PTEs when in negotiation with other non-statutory bodies

5. Consultation

- 5.1. There is no process outlined for consulting and adoption of the NPPF and therefore this needs to be defined.