



Consultation Response

Nationally significant infrastructure planning

Extending the regime to business and
commercial projects

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1. Introduction

- 1.1. **pteg** represents the six English Passenger Transport Executives (PTEs) in England which between them serve more than eleven million people in Tyne and Wear ('Nexus'), West Yorkshire ('Metro'), South Yorkshire, Greater Manchester ('Transport for Greater Manchester – TfGM'), Merseyside ('Merseytravel') and the West Midlands ('Centro'). The West of England Partnership, Leicester City Council, Nottingham City Council, Transport for London (TfL) and Strathclyde Partnership for Transport (SPT) are associate members of **pteg**, though this response does not represent their views. The PTEs plan, procure, provide and promote public transport in some of Britain's largest city regions.
- 1.2. The PTEs operate at the level of the city regions largely reflecting the relevant functional economic area and they operate at the optimum strategic level for the provision of 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. Our primary concern in relation to the consultation is that for Nationally Significant Infrastructure Projects (NSIPs) adequate consideration is given to the transport implications of such developments and that, in the city regions covered by ITAs and PTEs, that this is best achieved by formally consulting ITAs and PTEs as the strategic transport authorities for those areas.
- 1.4. **We therefore have significant concerns about the extension of NSIP regime into business and commercial projects in relation to the transport implications.**
- 1.5. Our views in relation to this consultation should be read alongside our response to the parallel consultation – '*NSIP: expanding and improving the 'one stop shop' approach for consents*'.

2. Response to Consultation Questions

Question 1: Do you agree that the proposed list of development types set out at Annex A should be prescribed in regulations in order to make them capable of a direction into the nationally significant infrastructure regime?

- 2.1. No
- 2.2. These are clearly local developments despite their scale. The significance of proper public transport advice and guidance with reference to infrastructure and service provision becomes even more acute with such large projects and the proposal to remove the 'statutory consultee' standing of ITAs and PTEs in the nationally significant infrastructure regime will mean a reduction in proper analysis of the cumulative impacts of these schemes on public transport networks and the communities which they serve. As a result the facilitation of employment and other engagement with these developments via public transport could suffer, and such sites may become detached from local communities either physically through lack of affordable connectivity (which public transport provides) or conceptually through a perception of inaccessibility.
- 2.3. There are further specific concerns about the inclusion of conference and exhibition centres; leisure, tourism, sports and recreation facilities within the proposed types of development as

these are potentially considerable generators of traffic which needs to be properly planned for.

Question 2: Do you think that thresholds should apply and, if so, whether those in column 2 of the table at Annex A are appropriate? If not, how should these be changed?

- 2.4. The intention proposed in the consultation document is that the Secretary of State would be responsible for determining whether a scheme is of national significance with the thresholds for development proposed to ensure that only significant forms of development is captured.
- 2.5. We have major concerns regarding this approach and feels that the proposed thresholds are significantly low, allowing many schemes (which PTEs would currently be consulted on) to be above the thresholds. In these cases, any public transport issues which may then arise and require resolution before planning permission is granted (i.e. how workers will access the site? /re-routing bus routes etc.) and generally ensuring that the delivery of transport mitigation is delivered, could well be ignored if ITAs and PTEs are no longer a statutory consultee.
- 2.6. Through ITAs and PTEs being consulted on large developments, the outcomes are positive. It results in improved integration of major developments within the local transport network and enhanced outcomes in terms of managing congestion, carbon reduction and the best use of transport investment programmes. But this could only be achieved where ITAs and PTEs are consulted. By imposing thresholds, and setting size limits that defines schemes of national importance, would take away our ability to ensure that accessibility is considered. The scale of the uses proposed for the threshold would all be major trip generators and would require access via multiple modes of transport. This raises the issue as to how we can raise concerns in the process they are proposing.

Question 3: Do you agree with our assessment of the factors that the Secretary of State would need to take into account when considering whether a project is nationally significant?

- 2.7. We agree that the possible impact of the proposed development should be one of the factors considered, particularly if it has significant effects beyond the immediate locality. Potential transport impacts should be a key consideration in this respect. These may include impacts on national road and rail networks, or more localised impacts on networks in areas which are in themselves of national significance e.g. an economically significant conurbation, or a National Park.

Question 4: Do you agree that retail projects should not be a prescribed business or commercial project?

- 2.8. Yes.
- 2.9. Retail projects should always be considered under local planning regulations which gives PTEs opportunity to have a significant input with regards to their impact on local communities

Question 5: Do you agree that Government should not prepare a National Policy Statement (or Statements) for the new category of business and commercial development?

2.10. No.

2.11. We strongly disagree given the nature of the proposed projects which could be included in the nationally significant infrastructure regime. The downscaling of this project type portfolio renders it even more appropriate that policy statements are made to embrace the more local impacts of these types of development. We believe that a public transport policy statement should be specifically prepared to accompany the statement on roads and infrastructure in order to acknowledge the more localised nature of the projects

Question 6: Do you have any other comments on the proposals that you would like to make?

2.12. Yes.

2.13. The aggregate impact of this proposal combined with the proposal to reduce the status of ITAs and PTEs as statutory consultees in the determination of nationally significant planning proposals will be detrimental to the aims of achieving sustainable development. Fewer consultees on nationally significant projects and the extension of the category will result in more planning proposals being decided without input from PTEs; and although the annual number of proposals affected by the changes is likely to be small, they would be of a scale that would result in widespread potential impacts.

2.14. Local authorities will be invited to submit a Local Impact Report. However to do this effectively authorities in metropolitan areas will need to take the advice of ITAs/ PTEs on public transport issues and, in the case of Greater Manchester, the Combined Authority on strategic highway issues. The parallel consultation, 'Nationally Significant Infrastructure Planning: expanding and improving the one stop shop approach for consents', proposes to remove ITAs and PTEs as statutory consultees in the NSIP process. If this is done there is a danger that the impacts of developments on the transport networks which are vital to the economic success of major conurbations will not be fully identified and mitigated. If this proposal is adopted, it will be essential for ITAs and PTEs to be involved in the preparation of Local Impact Reports and they should be invited to do so, along with the local planning authority.