

PPGs and Transport Planning Do they come together?

"A review of current national planning policy guidance notes to assess where transport issues are relevant to planning in the UK, across all aspects of policy"

Summary

1. Planning policy guidance notes set out Government policy on different aspects of planning in the UK. They provide guidance for local authority development plans and inform decisions relating to planning applications and appeals. Since the publication in 1998 of the Government White Paper (GWP) - A New Deal For Transport, Better for Everyone, a substantial body of new transport planning policy guidance has been issued by Government. This raises the issue of the extent to which there is consistency across current planning policy guidance with respect to the latest integrated transport policy.
2. This purpose of this paper is two-fold. Firstly, to undertake a review of planning policy guidance, especially in relation to transport planning policy; and secondly, to assess the degree to which there is a level of consistency in the application of the latest integrated transport policy across both UK transport planning and all other areas of planning.
3. Post 1998 Government policy guidance material shows a strong degree of consistency in terms of integrated transport policy. It is clear that, generally speaking, PPG3, 11, 12, 13, the New Approach to Appraisal (NATA), Guidance on the Methodology for Multi-Modal Studies (GOMMMS), Local Transport Plan (LTP) Guidance, GWP daughter documents and Transport 2010 enjoy a relatively harmonious relationship and make happy bedfellows. However, there are a significant number of guidance notes that are out of step with the latest Government thinking, PPG1, 2, 4, 6, 7, 8, 9, 10, 15, 17, 20, 21, 23, 24 and Minerals planning Guidance (MPG) 2. To an extent it is desirable rather than essential that most of these are updated. They form the poor relations of the PPG family. There are also a number of divorcees, in the form of circulars 09/95, 11/95 and 1/97 in need of some guidance counselling, to bring them into line with the latest Government thinking. This includes such as the monitoring and enforcement of Green Travel Plans, Transport Assessments, restraint based parking standards, bus quality partnerships etc. Aspects of Government policy on education

and health provision appear to be encouraging car usage and are also divorced from the latest integrated transport policy.

4. The review points to a number of important issues facing UK planning policy such as how to make planning guidance consistent giving the differing timescales associated with transport policy evolution and the development planning process. Also how to deal with the inherent conflicts within transport policy, such as economy versus environment? We want our policies to come together and we want development on the ground to be integrated but how long will this take?
5. The following next steps are recommended to address the issues raised by the review of current guidance:
 - 1) Several PPGs and especially Circulars 11/95 and 1/97 would benefit from being updated to bring them into line with the new PPG13;
 - 2) Government best practice guidance on the monitoring and enforcement of Travel Plans would be welcomed;
 - 3) A closer examination is needed into the level of integration between policy areas such as transport, health and education - the sorts of issues that Community Planning legislation should be addressing.

Introduction and Background

6. Planning Policy Guidance notes (PPG's) set out Government policy, including statutory provisions, on different aspects of planning in the UK. Their purpose is essentially two-fold. Firstly, to provide guidance for local authority development plans, and secondly, to inform decisions relating to planning applications and appeals.
7. Until 1998 the UK Government's thinking on transport was set out in the green paper Transport - The Way Forward (1996), produced by the then Department of Transport (DOT), the 1994 document Sustainable Development - The UK Strategy and the annual guidance produced for local authorities to assist their Transport Policies and Programmes (TPP) submissions. The Department of the Environment (DOE) produced PPG's, and those most relevant to transport were PPG12 on Development Plans and Regional Planning Guidance (1992), PPG13 on Transport, produced jointly with the DOT in 1994, and PPG6 on Town Centre and Retail Developments (1996).
8. The Government since 1998 has issued a substantial body of new transport planning policy guidance. However, this raises an important issue about the extent to which other planning policy guidance, either directly or indirectly related to transport, is consistent with the new guidance.

Purpose of this paper

9. The purpose of this paper is two-fold. Firstly, to undertake a broad review of planning policy guidance determining the scope of existing transport planning related policy documentation. A full list of the reference material can be found in the Bibliography. Secondly, to assess the degree to which there is a level of consistency in the application of the Government's integrated transport policy across:
 - a) *All areas of UK transport planning policy and,*
 - b) *All areas of planning policy in the UK.*
10. The following section sets out current Government transport policy, including PPG13 (2001), addressing a) above. The rest of the paper is then devoted to a scoping study reviewing the current state of all other PPG's (excluding PPG13), and other relevant policy guidance that is directly or indirectly related to transport planning, raising pertinent issues as appropriate. The conclusion assesses the extent to which full policy integration has happened and the steps that need to be taken to facilitate this.

UK transport planning policy

11. At the present time UK Government transport policy has its foundations in the July 1998 White Paper - **A New Deal For Transport - Better For Everyone**, the first comprehensive treatment via a White Paper for 20 years. It included five main criteria for transport, as follows: -
 - **Integration** - ensuring all decisions are taken in the context of integrated transport policy
 - **Safety** - to improve safety for all road users
 - **Economy** - supporting sustainable economic activity in appropriate locations and getting good value for money
 - **Environment** - protecting the built and natural environment
 - **Accessibility** - improving access to everyday facilities for those without a car and reducing community severance.
12. Integration is a key issue for this paper and was, of course, a unifying theme of the Government White Paper (GWP). The word integration was applied at several different levels. At a base level it meant integration between transport modes. At a higher level it meant greater integration between transport policy and that applying to other related areas - the environment, health, the economy, and education for example. It was also applied at an organisational level, not just integrated policies but integrated decision making too. Finally, integration was to be across areas, so that local, regional and national transport and land use policy was to be thoroughly consistent and capable of working together in a seamless fashion. Provision was made for the creation of

Regional Transport Strategies (RTS's) as part of Regional Planning Guidance (RPG), and the Local Transport Plan (LTP) system was introduced. In essence, the objective was that integration should support sustainable transport at all its levels, which ties-in with the objectives of the new PPG13, discussed below.

13. The above policies were supplemented by the **Roads Review, A New Deal For Trunk Roads in England**. In fact there are a whole raft of policy documents produced since the GWP, all aimed at delivering an integrated and sustainable transport system:-

- The **Bus Daughter Document: From Workhorse to Thoroughbred: A Better Role for Bus Travel (1999)**. This introduced the concept of formalised Quality Contracts and Quality Partnerships, promoted better bus timetable information and minimum standards for concessionary fares and encouraged joint ticketing arrangements.

- The **Workplace and Road User Charging Daughter Document: Breaking the Logjam (1998)**. This document set out the Government's proposals for giving powers to local authorities in England and Wales to introduce workplace parking and road user charging schemes. Primary objectives include decongestion, reduced emissions and lower traffic growth, with income being used for local transport improvements. Implementation of these proposals depends on local authorities being empowered through the Transport Act 2000, only approved by Parliament last November

- **The Road Safety Daughter Document: Tomorrow's Roads - Safer for Everyone (2000)**. This sets out the Government's road safety strategy and casualty reduction targets for 2010. Particular attention is paid to the safety of vulnerable road users, especially children. By 2010, in comparison to the average for 1994-98, the Government has targeted a 40% reduction in the number of people killed or seriously injured (KSI), a 50% reduction in child KSI and a 10% reduction in the slight casualty rate, expressed in terms of numbers per 100 million vehicle kilometres. A 10 point strategy is included indicating the intended roles of key stakeholders in implementing the strategy and hence achieving the targets.

- **Guidance on Full Local Transport Plans (2000)**. This followed on from the 1999 guidance produced for local authorities preparing Provisional LTPs, the context for which was set by the GWP. The 2000 version has more detailed guidance on appraisal, based on the guidance on multi-modal studies (GOMMMS - see below), and one or two other small but potentially significant changes, such as the insertion of a short section on car travel, noticeable by its absence in the provisional plan guidance. Although there is a section on integration with wider policies, important transport issues relating to health and education, discussed later in this paper, are not addressed.

- **Guidance on the New Approach To Appraisal (NATA), (1998)** This is a broadly based evaluation framework, aimed at trunk road schemes to support the Roads

Review (see above), based on the five over-arching GWP objectives for transport – environment, safety, economy, accessibility and integration. NATA is concerned with how information generated by existing appraisal techniques is used to inform decision making and is used to choose between options, for prioritisation and for determining value for money. Within LTPs it is applied to all proposals costing more than £5m. NATA focuses on problem definition and encompasses proper option evaluation, is disciplined and is rigorous. However, the assessment can be onerous, and needs to be carefully planned.

- Guidance on the Methodology for Multi-Modal Studies (GOMMMS) (2000).

Multi-Modal Studies (MMS's) arose from the Roads Review and are intended to examine transport problems in an area or corridor and develop options for addressing these problems, analysed using NATA. Where appropriate, the guidance makes reference to MMS's developing over-arching transport strategies for the study area that can influence patterns of movement, including specific reference to land-use policies and policies for transport using sectors, such as health and education. The output from MMS's are intended to inform RTS's, and, through these, LTP's. MMS's are to be guided by the spatial framework set out in Regional Planning Guidance (RPG) and development plans (where up to date). A fully integrated study is *almost* guaranteed through the requirement that the study objectives must 'nest' within one of the GWP's five main criteria for transport. For example, integration objectives might be to support specific planning policy X, or local land-use development Y. New roads would be a 'last resort'. It should be noted that with the timing of current LTPs, they have not really been informed by either RTSs or RPG.

14. Other important developments aimed at supporting the implementation of the GWP include the passing of the **Road Traffic Reduction (National Targets) Act 1998** and the **Transport Act 2000**. Key GWP elements, such as road user and workplace charging and quality contracts / quality partnerships can, since November 2000, be progressed on a statutory footing.
15. Finally, there has been the publication of **Transport 2010**, the Government's ten-year transport plan and the most comprehensive approach on transport provision for many years. This takes integration a step further, in terms of integrating public and private resources. The plan sets out how £180bn is to be spent on transport over the next 10 years. Only £21bn is earmarked for strategic road improvements. Most funding, some £120bn is targeted at public transport, rail, light rail, bus and park & ride.
16. The most important document however is the revised version of **PPG13 Transport (2001)**. This is intended to better integrate transport and land-use planning, building on the approach set out in the original PPG13, issued in 1994. It is a key element in the Government's new approach to transport, providing more meat on the bones of the GWP and setting out the general principles under which the planning system is to operate with respect to transport. It is essentially about how to deliver sustainable development - how to deliver the GWP, how to promote choice in transport decision-

making, (rather than predict and provide), how to promote a healthier environment and social inclusion and how to contribute to urban renaissance. It is intended to ensure that:

- LTP and development plan strategies are complementary;
- the focus for major travel generators is in urban areas, or near major public transport interchanges thus maximising the use of public transport;
- local day-to-day facilities are located in service centres accessible on foot or bicycle;
- new housing is located in existing urban centres, the highest density development being in locations most accessible by non-car modes;
- rural housing, commerce, shopping and leisure land uses are located in local service centres;
- parking policies are used to promote sustainable modes and reduce the reliance on the car. However, it should be noted that there is advice guarding against too much rigid application of this. In effect, parking policy is secondary to location factors;
- give priority to people, especially those who are disabled, over cars in town centres, mixed-use areas and local neighbourhoods;
- protect sites and corridors that could assist in the development of proposals to widen passenger and freight travel choices;
- community, personal and road safety are maximised.

17. Location is the prime consideration in the main planning policies above. Getting the location right is the key element in meeting the objectives of reducing the need to travel and encouraging sustainable modes of transport. Where the location of development is more dispersed, as in rural areas, there is a tacit acknowledgement that the car will remain the only real option for travel.

18. Other elements of PPG13 include advice on Travel Plans, Freight Quality Partnerships and Bus Quality Partnerships and the move away from traffic impact assessments (TIA's) towards more broadly based Transport Assessments, intended to focus on examining accessibility to proposed development sites by all modes of transport. Guidance on Park and Ride sites in the Green Belt is included together with an insert for PPG2.

19. It can be seen from the above that current UK transport planning policy is relatively well integrated, having been reviewed and updated over the last few years. One or two issues regarding timing remain though, with respect to the inter relationships between RPGs, RTSs and LTPs. In the main though, there is a high level of consistency in current transport planning policy. So how well is this reflected in the rest of the UK planning policy?

The Scoping study

Benchmarking Criteria

20. Two of the three main objectives of PPG13, which represents the interface between transport policy and planning policy have been used as a 'benchmark' to check for consistency in the application of integrated transport policy across all relevant areas of policy. Specifically, where applicable:

a) *Does the policy contribute to the promotion of sustainable transport choices?*

And

b) *Does the policy seek to reduce the need to travel, especially by private car?*

21. A summary of the findings of the scoping study is summarised in Table 1 which can be found at the end of this section. This indicates the degree to which an update of each policy document is considered necessary.

Planning Policies

22. **PPG1 General Policy and Principles (1997)** sets out the Government's approach to planning with an emphasis on sustainable development and mixed use developments. Reference is made to reducing both the need to travel and the level of parking provision and the promotion of means of transport other than the private car. The key policy objectives are closely aligned to the old PPG13 (1994). These are to achieve sustainability and reduce environmental impact of transport by integrating transport programmes and land-use policies. The aim being to reduce the growth in the length and number of motorised journeys, encourage alternative modes of transport, which have less environmental impact and so reduce reliance on the private car. The GWP and the new PPG13 have updated all this. There is now a different slant in terms of key policy objectives. Whereas the 1994 version of PPG13 had objectives related to reducing the growth in motorised journeys, encouraging travel by environmentally friendly modes and so reducing reliance on the private car. The revised PPG13 has a key objective to reduce the need to travel (e.g. by car), at all, for example, through mixed-use developments. There is also a clear emphasis on promoting non-car modes that offer a genuine choice of ways to travel, helping to ensure that the alternatives are attractive and therefore more likely to be utilised.

23. **PPG2 Green Belts (1995)** is not specific in its consideration of transport, tending to focus on matters such as the appearance of buildings in Green Belts. Transport is implicitly included through reference to sustainable development objectives though. This is somewhat surprising given the fact that Green Belts are inevitably located adjacent to the largest urban areas in England. It follows that these are the places where there is great pressure to improve inter-urban communications, especially through new or widened roads on orbital or radial routes e.g. M25. To an extent this PPG needs updating incorporating the insert on park and ride included in the new PPG13.

24. **PPG3 Housing (2000)** emphasises the need for new housing to be located where there is good accessibility by non-car modes. There is a clear commitment towards

sustainable development through advocating mixed-use developments and an expectation of more restrictive parking standards. The concept of 'sequential testing' is also introduced with the requirement that local authorities utilise existing urban locations for additional housing as a first priority.

25. Because PPG3 has been produced recently, post GWP, it is clearly compatible with the latest integrated transport policy thinking. However, PPG3 encourages local authorities to plan for a degree of uncertainty with regard to the release of development sites. This is good for small sites that utilise existing transport infrastructure, but could be a hindrance for larger sites requiring new transport infrastructure, which would be difficult to plan for. This is somewhat at cross-purposes with PPG12 (see later).
26. **PPG4 Industrial and Commercial Development and Small Firms (1992)**. Despite being 9 years old, PPG4 exhibits a reasonable amount of 'joined up thinking'. Paragraph one states "There is no contradiction in arguing both for economic growth and for environmental good sense. The challenge is to integrate the two". Clearly, the optimum locations for industry, business and commerce tend to be those where the development pressures are greatest. These are also where highway networks are most stressed by congestion hot spots.
27. PPG4 makes sensible reference to location factors such as reducing the length and number of trips by motor vehicle, encouraging development in locations that can be served by energy efficient modes of transport and discouraging development where it would add unacceptably to trunk road congestion. However, although PPG4 is cross-referenced in the new PPG13, being produced prior to 1992, it is inevitably somewhat out of date.
28. The new PPG13 emphasises ensuring major developments are located within urban centres or near major public transport interchanges. There is also direction towards encouraging development that has easy access for all, especially pedestrians and cyclists, to local service centres.
29. **PPG5 Simplified Planning Zones (1992)** outlines the process by which the development planning process can be speeded up. It has been applied in locations such as Birmingham Heartlands and Slough trading estate. They work by removing the requirement for separate planning applications to be submitted for successive stages of large developments. A scheme is derived at the outset, whereby planning permission is granted for any type of development within the range specified within a ten-year time frame. However, in practice, getting agreement to a SPZ can be very hard. There is no specific reference to PPG13-type transport requirements, which is of some concern. Arguably though this PPG is about the planning system, rather than a specific policy area.

30. **PPG6 Town Centres and Retail Developments (1996).** This introduced the sequential test for determining development sites in towns; edge and then out of town centres only being approved if no suitable town centre site existed. The site assessment criteria included examining whether there was easy access to proposed sites by a choice of transport modes. PPG6 also placed emphasis on the development of a coherent car parking strategy for town centres, including giving priority to short stay parking for shoppers and visitors ahead of long stay commuter parking. Local Authorities were encouraged to develop a comprehensive traffic management strategy for town centres, consistent with PPG13 (1994), the aim being to integrate their approach to development and transport, through creating PPG13-friendly schemes.
31. The advice is re-iterated in the latest version of PPG13, which represents something of a continuum in policy thinking in that it extends the sequential test to all forms of development. One weak link has been ensuring improvements to public transport accompany edge and out of town developments. This should be improved through Quality Partnerships, Quality Contracts and LTP's. However, it would still be desirable for PPG6 to be updated to bring it into line with the latest policy thinking, including sequential tests for mixed-use, non-retail units.
32. **PPG7 The Countryside - Environmental Quality and Social & Economic Development (1997).** This gives advice on development in rural areas, however, being pre-GWP, it refers to the 1994 PPG13 and there is scant reference to promoting environmentally friendly transport modes. In fact, references to transport at all are relatively few and far between. Certainly the reference to transport policy could have been more thorough. This issue appears to have been addressed to an extent through cross-referencing in the latest PPG13 where there is an emphasis placed on promoting social inclusion, reducing rural isolation and focusing rural development in local service centres accessible by non-car modes of transport. It would be prudent for an updated PPG7 to cross-reference this.
33. **PPG8 Telecommunications (1992)** gives guidance on planning for communications development, and in terms of integrated transport policy, is of little direct relevance, although it is acknowledged that improvements in telecommunications can reduce the need to travel, with consequent environmental benefits. In practice of course, the telecommunications revolution has had a number of undesirable consequences for transport; accidents caused by drivers using phones while driving, delays to road users due to cabling works etc. whilst traffic growth has continued. The impact of the ICT (information and communications technology) revolution has been reflected in PPG13 and the draft revised PPG8 issued for consultation last year.
34. **PPG9 Nature Conservation (1994)** gives guidance on how the Government's policies for heritage conservation should be reflected in land use planning. PPG13 (1994) is referenced. Beyond that there is little, if any, reference to transport policy. Access to SSSI's etc. does not appear to have been considered or included in this PPG which is somewhat surprising considering the negative impact transport, especially by

motorised vehicle, can have on the environment, and the fact that many of these locations are popular leisure / tourist destinations. Conservation organisations could usefully be better informed about transport policy, and it would be highly desirable to see some best practice guidance included in a revised version of this PPG.

35. **PPG10 Planning and Waste Management (1999)** updates PPG23 (Planning and Pollution Control, 1994). By accounting for developments in waste policy and the establishment of the Environment Agency in 1995, PPG10 brings guidance on planning for waste management up to date, although sections of PPG23 remain valid (see below). The policy seeks to minimise the environmental impacts of transporting waste through the principles of regional self-sufficiency and, in particular, the proximity principle (waste should be managed as close as possible to its place of production). It should be noted that, despite a clear relationship between waste management and transport, there is no cross referencing between PPG10 and PPG13, which seems strange considering both have been issued recently, and PPG13 refers to many other PPG's.
36. **PPG23 Planning and Pollution Control (1994)** has been partly superseded, as explained above, by PPG10 in terms of its coverage of waste management, waste disposal and waste local plans. The PPG explains the relationship between controls over development under planning law, on the one hand, and under pollution control legislation on the other. It is relevant to industrial development and waste treatment and disposal sites that could pollute the environment, and also the redevelopment of contaminated land. The 1994 version of PPG13 is referenced, however, neither PPG10 or PPG23 are referred to in the new draft version of PPG13, probably attributable to the fact that this PPG is not intended to address the indirect impacts of development, such as additional pollution from related traffic movements. This would usefully be an issue for a revised PPG23 to clarify.
37. **PPG11 Regional Planning (2000)** has been developed to take account of the GWP, specifically to help realise the aspiration for a fully integrated approach through consistent planning and land use policy at the local, regional and national level. By incorporating advice on developing an integrated transport strategy for a region PPG11 satisfies that aim. And this theme is carried through in the guidance on LTPs (DETR, 2000). It is expected that RTS's will set the context for the preparation of LTP's and development plans and that all documents will be thoroughly consistent. As mentioned above (para. 13) this has not really happened with current LTPs.
38. PPG11 contains guidance on how to prepare RTS's, the emphasis being on the involvement of as many key players as possible by the Regional Planning Bodies (RPB's) e.g. public transport operators. Railtrack, the Highways Agency, the Strategic Rail Authority, port and airport authorities, the relevant Government Office etc. Options and priorities will be established through multi-modal studies.

39. The theme of ensuring consistency between different plans is continued in **PPG12 on Development Plans (1999)**, which provides advice about how to ensure consistency between LTP's and development plans. Development plans should be based on a degree of certainty. Because the LTP strategy and prioritisation of transport investment has implications for development plans (Structure Plans or Unitary Development Plans [UDP's]), and because land-use planning decisions impact on the LTP strategy, it is vital that there is consistency between the two. A full set of LTP issues with possible land-use implications is set out in PPG12, and options are to be assessed using multi-modal appraisal techniques (i.e. by applying the NATA criteria), with a strong presumption against road building unless it can be clearly demonstrated that all other options are impractical.
40. **PPG14 Development on Unstable Land (1990)** is one of the oldest PPG's that has not been superseded. It is of little relevance in the context of this paper, being concerned with taking into account ground instability e.g. due to previous mining activity in the development planning process.
41. **PPG15 Planning and the Historic Environment (1994)** stresses the importance of taking full account of the impact of transport on the historic environment, given that there is a clear emphasis in Government transport policy (PPG13, 1994) on concentrating development on existing centres, including historic towns. That the advice in this PPG is somewhat dated is reflected in the fact that the section on transport gives a clear emphasis to traffic management, with a whole section devoted to consideration of policy with respect to new traffic routes, albeit only where unavoidable. Much has happened in this area since 1994, for example, with the implementation of Park and Ride schemes in York and Oxford, matters which are not referenced in this PPG and could usefully be added. However, much of the guidance is still relevant such as the discussion in relation to schemes for railways, tramways, waterways etc. promoted under the Transport and Works Act 1992, and the use of traffic calming measures and highway materials, street furniture and signs that are appropriate to historic centres.
42. **PPG16 Archaeology and Planning (1990)** sets out policy on how archaeological remains should be dealt with, including their treatment in the development planning system. It is clear that where there are archaeological remains that are of national importance, then there is a clear presumption against development in any form, whether it be buildings or transport related, as has been seen recently over the debate with regards to the A303 (T) at Stonehenge in Wiltshire. However, there is very little specific reference to transport policy in PPG16.
43. **PPG17 Sport and Recreation (1991)** is all about ensuring that all communities have access to the widest possible range of sport and recreational facilities. The planning framework, as it existed in 1991, is described and issues in urban, urban fringe, Green Belts and the countryside are covered. There is emphasis on safeguarding existing sport and recreational facilities from unwanted development. Transport is very much a

secondary consideration in this PPG. Apart from encouraging the re-use of old railway lines as linear routes for walking and cycling, and discussion relating to transport provision in relation to all-seater Football League stadia, there is little that can be tied-in with current integrated transport policy. PPG17 is referred to in the new draft version of PPG13 (but not vice-versa), which attempts to bring current thinking to bear on this area of planning policy. A revised PPG17 would need to ensure better coverage in this respect and a revised draft is currently out for consultation.

44. **PPG21 Tourism (1992).** As with PPG17 above, this guidance note is somewhat out of date with respect to the latest integrated transport policy thinking. For example, it refers to PPG13 as one of the relevant accompanying PPG's, but since PPG21 was last issued in 1992, the version of PPG13 referred to is that titled 'Highways Considerations in Development Control' (!). PPG21 outlines the economic value of tourism, together with its environmental impact. It explains how tourism should be treated in development plans and in development control. As with PPG17 transport is very much a secondary consideration, and, where it is mentioned, it is in the context of traffic management-related measures. Likewise there is reference in the new draft version of PPG13 to this PPG, and some limited discussion on how the latest transport policy advice should be applied.
45. **PPG18 Enforcing Planning Control (1991)** sets out the powers that local planning authorities (LPA's) have to enforce planning controls under the 1991 Planning and Compensation Act. As such, this PPG is generally applicable to all planning policy areas.
46. **PPG19 Outdoor Advertisement Control (1992)** sets out the role of LPA's in controlling all forms of outdoor advertising in terms of amenity and public safety. The latter includes the impact of advertisements on drivers who could become distracted by the signs; however, this is the only reference to transport in this PPG.
47. **PPG20 Coastal Planning (1992)** describes planning policy for coastal areas of England and Wales, the aim being to reconcile the development pressures with the need to protect and conserve the coastal landscape, its environmental quality, wildlife habitats and recreational opportunities. Transport is conspicuous by its absence throughout this PPG, and there is no specific cross-reference to PPG20 in the new draft version of PPG13. This seems to be somewhat at odds with a clear need in many high quality coastal areas to improve the transport system so as to better manage access to these areas, and thus mitigate against potential transport-related environmental damage (see also discussion on PPG21 above).
48. **PPG22 Renewable Energy (1993)** describes the various forms of renewable energy and includes a statement of general planning aims, reference to relevant environmental protection legislation, the role of LPA's etc. There are accompanying annexes on each form of renewable energy that describes the technology and the planning implications for each. Reference to transport is in terms of the vehicular impacts of the site plants;

impact of construction traffic, on-going vehicular access requirements etc. although there is reference to considering rail access where a suitable railhead exists.

49. **PPG24 Planning and Noise (1994)** gives guidance to LPA's in England on the use of their planning powers to minimise the adverse impact of noise. There are a number of practical issues with regard to noise and transport that are difficult to resolve. For example, restricting aircraft movements or other noisy transport activities to daytime periods can exacerbate road congestion. Historical factors have often resulted in noise intensive land-uses being in close juxtaposition with noise sensitive areas, London's Heathrow airport being a case in point. However, locating noisy developments where they have a low impact can result in longer travel distances to service the development. It would be highly desirable for a revised PPG24 to address these and other such issues.
50. **PPG25 Development and Flood Risk consultation paper (2000)** is intended to replace DOE Circular 30/92 and to apply to England. It follows a flood and coastal defence review undertaken by the DETR in consultation with Environment Agency and the Ministry for Agriculture, Fisheries and Food (MAFF). Guidance is included on flood risk from both rivers and the sea, emphasising the need for a precautionary risk-based approach to be taken to development in flood risk areas in accordance with the principles of sustainable development and the likely impacts of climate change. The overall aim is to ensure that inappropriate development does not take place in locations that are at risk from being flooded, and that new development does not lead to additional flood risk. An important issue is what constitutes appropriate or inappropriate development, an issue that the consultation paper seeks to obtain views on. In terms of the Government's new integrated approach to transport policy, this PPG is not relevant.
51. **MPG2 Applications, Permissions and Conditions (1988)** covers the planning applications for minerals development, planning permissions and the imposition of planning conditions. Specific sections are included in MPG2 relating to the requirement to consult the Secretary of State with respect to proposed developments that affect trunk roads, whether existing or proposed in development plans (note: no mention of the Highways Agency), which may then have planning conditions imposed upon the permission. Similarly, for classified roads, local highway authorities must be consulted if the development will affect the road.
52. MPG2 includes a section on access and protection of the public highway. This is concerned with ensuring that development-related traffic avoids unsuitable parts of the highway network, through the use of planning conditions relating to access arrangements set out in consultation with the local highway authority or the Department of Transport (now the DETR / Highways Agency). Given that the movement of excavated material constitutes one of the heaviest types of traffic, Section 278 (Highways Act 1980) agreements may be entered into with the developer to ensure contributions to highways works, including that for maintenance. Muddled

roads can create unsafe conditions for all road users, and these can be mitigated against by ensuring that on-site washing facilities are installed as part of a planning condition. Legally, it is impossible to restrict lorries to the use of certain routes, except through the provision of a Traffic Regulation Order (TRO), as also set out below in the discussion on circular 11/95. However, this may affect traffic unrelated to the development, and so where traffic control is not feasible, then applications may have to be refused.

53. **Circular 09/95, General Development Order Consolidation (1995)** consolidates the orders set out in the 1990 Town and Country Planning Act. It contains the main changes to the permitted development and procedural provisions, e.g. those relating to planning appeals and registers. It incorporates deregulatory measures, granting general planning permission for many types of development, subject to various conditions that protect amenity and the environment. References to transport are relatively few in this circular, mainly being related to ensuring developments do not encroach too close to the highway, or result in a railway level crossing being blocked due to additional development-related traffic. Part 8 of Schedule 2 seeks to ensure that parking areas agreed as part of the development are not reduced as part of Class A developments; food and drink or display for sale of motor vehicles, presumably to minimise nearby on-street parking problems. Generally, this circular appears to be consistent with the requirement for traffic impact assessments (TIA's), but is out of date with respect to the requirement for more broadly-based transport assessments included as part of the revised draft PPG13. An update is required.
54. **Circular 11/95, The Use of Conditions in Planning Permissions (1995)** advises on changes since 1985 in law and policy relating to planning conditions, including references to updated legislation. In particular, it reflects the contents of PPG13 (1994) and guidance at the time in relation to transport (although not for Wales where the 1988 version of PPG13 continued to apply at the time). The intention of planning conditions is to enhance the quality of a development and allow developments, that would otherwise have been rejected, to proceed. It is intended that these will be imposed on a necessary, fair and reasonable basis, and can be enforced. Reference is made to applying consistency with all PPG's, development plans etc. Examples of conditions may relate to such as hours of operation, provision of operational parking spaces, diversion or stopping-up of existing highways prior to a new housing estate being built (a third party action) and time limits when development must commence by.
55. There is a specific section entitled 'highway conditions' which sets out specific matters relating to parking, public transport, walking and cycling, access and lorry routeing. Reference is made to ensuring that adequate car and cycle parking is available, or that contributions are made towards improved access for non-car transport modes, with reference to PPG13 (1994). Conditions with respect to access roads includes ensuring that they join the road network at an appropriate point e.g. not directly to main roads, if that is part of the relevant local authority policy. Lorry routeing is also discussed,

and it is made clear that specific routes can only be enforced through the provision of a TRO.

56. It can be seen from the above that this circular is 'out of step' with more recent PPG notes, particular the requirement for Transport Assessments, set out in the revised PPG13 (2001). Specifically these should include an estimated mode-split for a development that includes predictions of the reduced numbers of motorised journeys associated with the proposal due to improvements in walking, cycling and public transport. There is specific reference to local authorities reviewing key sites to ensure that those with travel intensive uses (e.g. offices, hospitals retail etc.) are located where there is high accessibility by non-car modes, and that sites that are, or will be, relatively poorly served by non-car modes are allocated less travel-intensive uses. It should also be noted that there is no reference to the provision of developer Travel Plans and the section on access for disabled people should now include reference to the provisions of the 1995 Disability Discrimination Act. An update is required.
57. Department of the Environment **Circular 1/97** sets out the Government's policy for the use of **Planning Obligations**. These are made under section 106 of the 1990 Town and Country Planning Act, and relate to measures considered necessary to make a proposal acceptable in land-use planning terms. With regard to transport-related matters they could include new roads, park and ride facilities, pedestrian-friendly measures, bus shelters and cycleways. They cover one-off provision of facilities and exclude maintenance, except where essential highway works are a pre-requisite to granting planning permission (an agreement is made under section 278 of the Highways Act 1980), or where some (strictly limited) funding of public transport would contribute to sustainable development.
58. The circular references the 1994 version of PPG13, and is therefore out of step with the GWP and the new version of PPG13. No reference is made to GTP's, Transport Assessments, Bus Quality Partnerships, restraint based parking standards etc. The ability to deliver integrated transport policy is therefore somewhat constrained. Difficulties faced by local authorities include the inability to secure lorry routes - being voluntary not enforceable, the difficulty in securing funding for necessary public transport improvements remote from the development, traffic management measures or for TRO making and the inability to place GTP obligations on third parties who have leased sites from the original planning applicants. The lack of guidance on enforcing GTP elements included in section 106 agreements is a concern and the status of unilateral agreements or undertakings, where a developer submits their own section 106 agreement if they have not reached agreement with the Local Authority, is unclear. Overall, 1/97 cautions local planning authorities against trying to include more obligations than are strictly necessary.

Health policies

59. In October 1999 a guide called Making T.H.E. Links was published (reviewed in Local Transport Today), aimed at local authorities and their counterparts in the NHS, which encouraged the development of joined-up policies in Transport, Health and the Environment. Planning for local health strategies in England has been formally set out in Health Improvement Plans (HImPs) since April 1999. They contain delivery targets for a number of health performance indicators such as a reduced incidence of asthma. They also have the potential to include transport-related targets like road traffic accidents, numbers of GTP's, reducing social exclusion by making public transport more accessible to those who need it etc.
60. PPG13 mentions the importance of measuring local air quality, as part of an integrated approach towards transport and planning. Local Authorities are required, as part of the 1995 Environment Act, to designate air quality management areas, where national policies are unlikely to deliver the Government's health-based national air quality targets. Also mentioned in PPG13 is the promotion of walking by local authorities through partnerships with local health authorities and input to HImPs. Local health and planning authorities are encouraged to work together in Making T.H.E. Links, so as to agree a procedure for assessing the health impacts of an LTP, and producing an accompanying Health Impact Assessment (HIA).
61. This is good news for joined-up policy thinking. However, of concern is current Department of Health policy to concentrate healthcare facilities into a smaller number of larger hospital sites. While it may make economic sense to centralise medical resources as much as possible, the transport impact is to increase travel distances and hence reduce the likelihood of using environmentally friendly modes of transport. Whilst local planning authorities can insist on a robust green travel plan as part of a planning application to expand an existing hospital site, no planning consent is required to close a hospital. Parking standards for hospitals are not included in PPG13 but are to be issued by the Department of Health.

Education Policies

62. Transport and education are two policy areas closely linked in many ways such as through Safe Routes to Schools projects and in getting transport onto the Curriculum. However, there are a number of areas where there is a lack of integrated transport thinking. For example, the Department of Education policy to promote large secondary schools negatively impacts on travel patterns in terms of distance travelled and mode choice, normally to the detriment of sustainable options. There is also the Department of Education policy that schools should be economically viable, leading to closure of local schools, especially in rural areas with similar negative impacts on travel behaviour, and something that local authorities have no control over. There is also the policy of offering freedom of choice of school for pupils, meaning they can attend a school miles away from their home resulting in a significant negative impact on school journeys, and on health of school children. On the positive side, issue of School Travel Resource Pack last year, jointly produced by DETR, Department of

Health and Department for Education and Employment indicates a degree of joined-up policy thinking.

63. The extent to which policies on health, education and transport represent joined-up thinking and contribute to sustainable development is suggested as an area for further research. This is something that should be examined as part of Community Planning legislation.

Summary

64. Table 1 below summarises the findings of the above review, in terms of the extent to which each policy meets the primary objectives of PPG13.

Table 1: Summary of scoping study

<u>policy document</u>	Does the policy contribute to the promotion of sustainable transport choices?	Does the policy seek to reduce the need to travel by private car?	Issues / Recommendations
GNATA, GOMMMS, GWP etc.	Yes	Yes	Current LTPs not informed by RPG / RTSs
PPG1	Yes but based on 1994 PPG13	Yes but based on 1994 PPG13	Could update when a new PPG is issued
PPG2	Not directly	No	Update would be helpful
PPG3	Yes	Yes	Clarification needed regarding planning for certainty
PPG4	Generally yes, but predates 1994 PPG13	Generally yes, but predates 1994 PPG13	An update for consistency would be helpful
PPG5	No - no reference to PPG13-type objectives / elements	No - no reference to PPG13-type objectives / elements	An update could be helpful
PPG6	Yes but based on 1994 PPG13	Yes but based on 1994 PPG13	An update would be helpful
PPG7	Somewhat - limited reference to transport & based on 1994 PPG13	Somewhat - limited reference to transport & based on 1994 PPG13	An update for consistency would be helpful
PPG8	No	Yes	An update for consistency would be helpful (revised version pending)
PPG9	No	No	An update could be helpful
PPG10	Yes	No	An update could be helpful

PPG11	Yes	Yes	None (exc. Current LTPs not really informed by RPG / RTS)
PPG12	Yes	Yes	Consistency with PPG3 needs reviewing
PPG14	No (N/A)	No (N/A)	None
PPG15	Yes but based on 1994 PPG13	Yes but based on 1994 PPG13	An update could be helpful
PPG16	Only where new roads are proposed in areas of archaeological importance	No	None
PPG17	Somewhat - limited reference to transport & pre-dates 1994 PPG13	No	An update could be helpful (consultation on revised version on going)
PPG18	No (N/A)	No (N/A)	None
PPG19	No (N/A)	No (N/A)	None
PPG20	No	No	An update could be helpful
PPG21	Very small impact only - little reference to transport & pre-dates 1994 PPG13	No	An update could be helpful
PPG22	Somewhat - fairly limited reference to transport & pre-dates 1994 PPG13	No	None
PPG23	No (N/A)	No (N/A)	An update could be helpful
PPG24	No (N/A)	No (N/A)	An update could be helpful
PPG25	No (N/A)	No (N/A)	none
MPG2	No (N/A)	No (N/A)	An update could be helpful
Circular 1/97	Yes but based on 1994 PPG13	Yes but based on 1994 PPG13	Update needed
Circular 11/95	Not fully	Not fully	Update needed
Circular 9/95	Not fully	Not fully	Update needed

1. Generally speaking, the policies can be separated into the following categories:
 - a) Those policy guidance notes where there is a high level of consistency with the latest integrated transport policy. Inevitably, these are the guidance notes produced since the 1998 White Paper - PPG3, 10, 11, 12 and 13, NATA, GOMMMS, LTP guidance, GWP daughter documents and Transport 2010.
 - b) Those policy guidance notes where there is scope for greater policy integration. These tend to be guidance notes that were produced in line with the 1994 version of PPG13. To a greater or lesser extent they include references to sustainable transport, combating car use etc., but need updating to bring them into line with the latest thinking - PPG1, 2, 4, 6, 7, 8, 9, 10, 15, 17, 20, 21, 23, 24, MPG2, circular 09/95, 11/95 and 1/97. They also include policy areas where there is a lack of guidance with respect to current trends, such as in health and education policies.
 - c) Those policy guidance notes which are largely irrelevant to transport policy - PPG5, 14, 16, 18, 19, 22, 25.

Conclusions

2. In conclusion, it can be seen that post 1998 Government policy guidance material shows a strong degree of consistency in terms of integrated transport policy. It is clear that, generally speaking, PPG3, 11, 12, 13, the New Approach to Appraisal (NATA), Guidance on the Methodology for Multi-Modal Studies (GOMMMS), Local Transport Plan (LTP) Guidance, GWP daughter documents and Transport 2010 enjoy a relatively harmonious relationship and make happy bedfellows. However, there are a significant number of guidance notes that are out of step with the latest Government thinking, PPG1, 2, 4, 6, 7, 8, 9, 10, 15, 17, 20, 21, 23, 24 and Minerals planning Guidance (MPG) 2. To an extent it is desirable rather than essential that most of these are updated. They form the poor relations of the PPG family. There are also a number of divorcees, in the form of circulars 09/95, 11/95 and 1/97 in need of some guidance counselling, to bring them into line with the latest Government thinking. This includes such as the monitoring and enforcement of Green Travel Plans, Transport Assessments, restraint based parking standards, bus quality partnerships etc. Aspects of Government policy on education and health provision appear to be encouraging car usage and are also divorced from the latest integrated transport policy.
3. The review points to a number of important issues facing UK planning policy such as how to make planning guidance consistent giving the differing timescales associated with transport policy evolution and the development planning process. Also how to deal with the inherent conflicts within transport policy, such as economy versus environment? We want our policies to come together and we want development on the ground to be integrated but how long will this take?

4. The following next steps are recommended to address the issues raised by the review of current guidance:

1) Several PPGs and especially Circulars 11/95 and 1/97 would benefit from being updated to bring them into line with the new PPG13;

2) Government best practice guidance on the monitoring and enforcement of Travel Plans would be welcomed;

3) A closer examination is needed into the level of integration between policy areas such as transport, health and education - the sorts of issues that Community Planning legislation should be addressing.

Mervyn Bartlett. June 2001

The views expressed in this paper are those of the author and do not necessarily reflect the policies of Surrey County Council.

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