

PLACES, PEOPLE AND PLANNING: POSITION STATEMENT ON THE FUTURE OF THE SCOTTISH PLANNING SYSTEM

Response by Chartered Institution of Highways & Transportation, Scottish Policy Forum

The Chartered Institution of Highways and Transportation (“**CIHT**”) is a membership organisation representing over 14,000 people who work in the highways and transportation sector. CIHT members plan, design, build, operate and maintain best-in-class transport systems and infrastructure, whilst respecting the imperatives improving safety, ensuring economic competitiveness and minimising environmental impact.

CIHT Scotland embraces both public and private sectors across the whole geography of the nation and welcomes the opportunity to comment on the consultation on the future of the Scottish planning system. CIHT supports the need to review the strategic processes associated with the planning system that has not seen significant change for over a decade. While the importance of understanding the integrated nature of development, environment and transport is generally accepted, we believe it is critical that transport organisations are part of this discussion.

We responded to the previous consultation and welcome the opportunity to comment (selectively) on the Position Statement. Our considered response to the four questions posed are offered below:

Questions

- 1. Do you have any views on the proposals contained within the position statement? There is no need to restate views already expressed in relation to Places, People and Planning as these have been, and will continue to be, taken into account as we move towards finalising the actions to be taken.**

We note that the consideration of proposals is ongoing but several indicative markers have been made in the Position Statement. In general, we detect that many of our points have been considered and are reflected in the proposals or commentaries. As requested, we do not intend to simply repeat our key issues but do offer a few additional, pertinent comments below:

- We welcome the comments relating to calling for design/masterplans to ensure quality of place but that is not backed up by any commitment.
- We are also pleased to see the recognition that effective infrastructure is an essential feature of a quality place but note the lack of consensus on a solution for its governance, duties and responsibilities. Ministers’ rejection of a new Infrastructure-Planning agency is understood, however, there remains a gap in funding and co-ordination of regionally significant transport projects. Bureaucracy concerns can be minimised by recognising the existence of the de-powered Regional Transport Partnerships which can provide continuity of knowledge when the SDPs expire. Unlike City Deals, they provide a geographical equity across Scotland.

- While some important details have still to emerge, we have some concerns about the new review and preparation process for LDPs, in particular, the “gatecheck” process. We wonder how this will work and who will carry it out. Our members have seen many LDPs where the transport impacts of the spatial strategy are not appropriately assessed yet the plans move forward with insufficient information on impact, mitigation and delivery. This leaves a heavy burden on the development management process which is not appropriate and does not adequately deal with potential cumulative impacts. However, we would hope that this issue will be addressed by the proposed “gatecheck” process with a sufficiency of evidence being presented to enable the plan to progress on an agreed basis. In that regard, it is not clear what happens when there is a dispute between a Reporter undertaking the “gatecheck” and the planning authority. It is not clear from the Position Statement whether the Reporter is to play an advisory role or a decision-making role or what happens if there is a dispute. The proposed process as set out is all fine if everyone is in agreement.
- The Position Statement’s reference to “infrastructure first” is welcome but the cascade of the delivery mechanism from national – regional - local needs to be well-defined to optimise collaboration and maximise funding. These working arrangements will be crucial to success as strategic development planning changes to “regional partnership working”. We note with interest the reference to the National Transport Strategy’s review of transport governance arrangements at national/regional/local levels.
- We welcome the intention to align the review of the National Planning Framework with emerging outcomes from the National Transport Strategy and the Strategic Transport Projects Review, although timescales seem optimistic to permit a truly integrated and interactive consideration.
- There is little acknowledgment of the findings of the Community Infrastructure Levy review in England and Wales, which was highlighted by many respondents. The original levy down south delivered a fraction of the funding required for infrastructure and there are now plans to completely revamp the system to address that. We think it will be even more important for us to get it right given the relatively small income that is likely to be delivered and the potential administrative cost.
- Finally, we are pleased to see that success of the planning reforms should be measured by outcomes and that an agreed Place Standard offers a reasonable way to do this.

2. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)

- Very thorough scope and good use of available resources. (There must be scope for Big Data analytics to assist in the gathering and analysis of such large collections of data.)

3. What are your views on the predicted environmental effects as set out in the Environmental Report?

- The SEA report seems reasonable and reaches a sensible conclusion given the proposed Planning Bill (still to be finally defined) is focussed on process and procedural changes. The process is still likely to include assessment requirements for environmental impacts and in that regard, it seems unlikely to have any detrimentally significant effects. Proper integration of transport considerations, especially at regional level, would greatly assist the achievement of environmental objectives.

4. What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

- The findings and measures all seem reasonable for the current assumption of content of the Planning Bill. Digital technology should aid future data collection to aid monitoring processes. Connectivity-sympathetic consideration of spatial location of development and green construction principles should be encouraged. To that end we welcome proposals for guidance on Local Place Plans and for aligning SEA and FRA procedures for the new LDP process.