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To whom it may concern,

# Response to the consultation on the draft Strategic Transport Plan

The Royal Town Planning Institute (RTPI) welcomes the opportunity to provide evidence to Transport for the North's consultation on the draft Strategic Transport Plan. This response has been developed with input from members in the three Northern RTPI regions.

The RTPI has over 25,000 members who work in the public, private, voluntary and education sectors. It is a charity whose purpose is to develop the art and science of town planning for the benefit of the public. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, practice advice, training and development.

Please see our submission to the consultation below.

Yours faithfully,

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#### Introduction

- 1. RTPI welcomes the draft Strategic Transport Plan (STP) from Transport for the North (TfN). This marks a welcome return to strategic plan-making in the North of England and complements the English devolution agenda. The value of the document is that it:
  - Provides a comprehensive analysis of current challenges across the north, including historic underinvestment in transport infrastructure and the maintenance of existing assets
  - Makes a clear case for additional transport investment in order to unlock transformative growth
  - Clearly demonstrates the spatial relationship between transport infrastructure, prime and enabling capabilities and key employment clusters, using high quality visual tools
  - Provides scenarios by which to better understand the relationship between transport, urban growth and technological change
  - Creates opportunities to improve the transport appraisal process by packaging individual schemes and connecting them to key economic, social and environmental issues, which show the wider benefits that can be achieved
- 2. The STP also provides a necessary mechanism to arrive at a consensus on scheme prioritisation, funding and phasing. The final STP should drive this forward by setting out a clear portfolio of projects, detailing the feasibility studies and business case, start and completion dates, and sources of funding.
- 3. The RTPI response to this consultation focuses on the integration between the STP and spatial planning at various sub-regional levels.

#### Integration with spatial planning

4. The STP recognises that transport is an integral component of spatial planning. It is critical that transport strategies, policies and investment decisions support sustainable settlement patterns and urban forms, and contribute to the creation of healthy, equitable, resilient and productive places. The STP recognises the need for integration between transport and land use planning at a range of scales, and TfN expects that the spatial plans produced by local and combined authorities will become aligned with the STP and TfN's investment programme over time.

## The risk of housing and labour market dispersal from improved connectivity

- 5. The STP is focused on improving connectivity to help people access jobs and services, thereby supporting economic growth. To ensure that improvements to connectivity contribute to sustainable economic growth, the STP would benefit from a more in-depth consideration of the dynamic relationship between transport, land use planning and market forces.
- 6. In particular, it should seek to recognise and mitigate the risk of new and expanded road infrastructure contributing to the dispersal of development and economic activity. This could lead to greater traffic volumes and congestion, which may counter some of the agglomeration benefits of increased connectivity. There are a number of factors within the planning system and wider housing/land market which can enable this negative cycle to occur, including:

- The requirement on local planning authorities to demonstrate a five-year land supply
- Policy constraints on the location of new development, such as green belt land
- The emphasis on viability within the planning policy, which can lead developers to build at lower densities in greenfield sites
- The number of local authorities without an adopted Local Plan
- 7. There is a lack of analysis on how changes to planning policy impact upon the location of new housing development. The address this gap, the RTPI's Location of Development project has been mapping the location of planning permissions for housing granted since 2012 in 12 English city-regions (five of which are in the north) and analysing their proximity to public transport and major employment clusters. The Foundation for Integrated Transport has also funded research to explore whether new housing estates are being built with sufficient provision of sustainable transport. Both research projects suggest there is little room for complacency, noting areas of settlement growth in locations which are far from mass public transport nodes and employment clusters, and new housing estates which are designed around the car.
- 8. Furthermore, the planning system has only limited influence on travel demand because only 10% of the locational choices made by businesses and households are met by new development. The other 90% is represented by turnover within the existing stock of buildings (churn). For this component, transport provision is the main driver of travel demand.
- 9. This means that better integration is required between transport and land-use at both local and scheme levels, and at the strategic level represented by the STP. Measures are needed to mitigate the risk of improved transport connectivity resulting in the loss of potential economic productivity through 'de-agglomeration', for instance by:
  - Increasing accessibility to peripheral locations, which drives relocation by residents and businesses within the existing building stock (churn)
  - Increasing accessibility to land in peripheral locations which encourages new development
- 10. Such dispersal of housing and labour markets contributes disproportionately to travel demand, especially by car, leading to congestion on the inter-urban network and other negative externalities (e.g. air pollution). Developer contributions are generally insufficient to mitigate this impact, except at local levels, meaning that additional investment is required over the long-term to maintain connectivity. This diverts resources away from transport improvements and regeneration within urban areas.
- 11. Furthermore, any increase in journey lengths and car use will also make it extremely challenging to make the required cuts in transport emissions required by the 2008 UK

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<sup>&</sup>lt;sup>1</sup> This project analysed planning permissions granted between 2012 and 2015 in 12 English city-regions, including Leeds, Newcastle, Blackburn, Warrington and Coventry. As an example, this found that in the Newcastle city-region only 4% of new houses granted permission were within easy walking and cycling distance of a railway station, rising to 18% for a metro station. For more details see: rtpi.org.uk/locationofdevelopment

<sup>&</sup>lt;sup>2</sup> See transportfornewhomes.co.uk

Climate Change Act, as these factors account for the majority of the increase in transport emissions which have occurred over the last fifty years.<sup>3</sup>

## Mitigating risks through a dynamic approach to assessing infrastructure need

- 12. The STP should firstly recognise the potential for capacity increases on both the Strategic Road Network (SRN) and Major Road Network (MRN) to cause an increase in traffic, both through churn within the existing stock of buildings and through dispersal of new development. To mitigate this risk it is important that local authorities are able to prioritise development in locations that make good use of existing and planned transport networks, and minimise the need or preference to travel by unsustainable modes. It also means that decisions over the location of new high-capacity, low-carbon transport infrastructure should inform planning decisions over the location, form and volume of new development, as well as other actions that influence locational choices (e.g. urban regeneration).
- 13. At a broad level, the STP should clearly demonstrate that it is using a dynamic methodology for assessing infrastructure need. This needs to accounts for the ability of infrastructure investment to create new markets and unlock areas for development, which in turn create new patterns and levels of infrastructure need. The alternative a linear approach to assessing infrastructure need based on current patterns of demand will tend to reinforce prevailing patterns of growth and limit the scope for transformative change. This is explained in more detail in the RTPI response to consultations from the National Infrastructure Commission.<sup>5</sup>
- 14. The deliver these objectives the STP should clearly set out how it intends to work with local planning and transport authorities, and any emerging development corporations, to better integrate transport and land use planning. This could include input into the development of strategic spatial plans and statements of common ground by local and combined authorities. The STP should also consider how the discussions that it facilitates over the prioritisation and phasing of infrastructure can be used to incentivise cooperation between local authorities on the strategic planning of housing and employment. There are a number of ways in which these partnerships can be formalised, many of which are discussed in the National Infrastructure Commission's discussion paper on strategic planning in the Cambridge Milton Keynes Oxford growth corridor.<sup>6</sup>
- 15. The STP creates the potential to plan the strategic road and rail network in a more integrated manner, and to support the development of multi-modal transport hubs in key locations. This ability has already been demonstrated in some of the forward-thinking around High Speed 2, which is increasingly linked to the delivery of housing and jobs rather than simply inter-urban connectivity and reduced journey times.

<sup>&</sup>lt;sup>3</sup> Wenban-Smith, A. 2017. Land use drivers of transport emissions – revisited. Transport 170(2), ICE, London.

<sup>&</sup>lt;sup>4</sup> For a more detailed explanation of these factors see the Transport Planning Society's response to the DfT consultation on 'Proposals for the creation of a Major Roads Network', available at: tps.org.uk/public/downloads/arH55/TPS%20response%20to%20DfT%20MRN%20consultation%20DRAFT%20v0 3..pdf

<sup>&</sup>lt;sup>5</sup> See: rtpi.org.uk/media/1906829/RTPI%20Evidence%20-%20National%20Infrastructure%20Assessment.pdf

<sup>&</sup>lt;sup>6</sup> National Infrastructure Commission. 2017. *Strategic planning in the Cambridge – Milton Keynes – Oxford growth corridor: a discussion paper.*assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/598767/170308\_Strat egic\_Planning\_and\_Governance\_Discussion\_paper\_prepublication.pdf

- 16. The STP will need to address the risk of speculative development and land trading occurring as transport infrastructure plans become more certain, and work with central government and local authorities to ensure that mechanisms are in place to compulsorily purchase land at existing use value and capture the increase in land value following public investment in infrastructure. Otherwise there is a risk that improved connectivity will contribute to rising land values and perpetuate the processes of de-agglomeration highlighted in paragraph 9.
- 17. There are a number of further supporting actions which TfN could undertake at a regional scale or in specific parts of the north to support strategic planning, including:
  - Mapping Public Transport Accessibility Levels (PTALs) and public transport capacity
    to assist local planning authorities in locating new development in areas and at
    densities which promote sustainable travel. This will in turn assist transport
    authorities and TfN when it comes to prioritising schemes and locations for
    investment, and factoring wider impacts into the appraisal process.
  - Developing Land Use-Transport Interaction (LUTI) models which can be used by local planning and transport authorities to better understand how the changes in accessibility provided by transport interventions will affect the locational choices of businesses and households, and the likely transport impacts. While LUTI modelling has been done at a strategic level, both for TfN and HS2, this has focused on the effects of transport on land-use, while the feedback into travel demand has not been explored in sufficient depth to deal with the 'de-agglomeration' risks noted earlier. The technical difficulties of bringing together transport modelling over large regions make this challenging, but means that the LUTI work needs to be supplemented at more local levels, where the two-way interaction can be studied.
  - Modelling the location of strategic sites and planning permissions for housing in relation to key employment clusters and transport infrastructure (building on to the RTPI's Location of Development project)
  - Helping local and combined authorities to set targets for modal split
  - Driving integration with strategic cycling networks across the region
  - Sharing best practice on the integration of transport and land use planning
- 18. The STP should also recognise the point made above that while new homes make up about 10% of total housing market, the remaining 90% of housing choices results from transactions within existing market. These movements have the potential to create long-term shifts in travel behaviour which are difficult to manage. A wide package of measures are therefore needed to ensure that churn within the existing building stock supports the shift towards sustainable travel patterns. Many of these measures will be taken at the city-region and county level, as they concern urban regeneration and place-making, the funding of intra-urban public and active transport infrastructure, and traffic demand management. The STP should be clear on how its proposals contribute towards these wider measures, for example through:

tps.org.uk/public/downloads/arH55/TPS%20response%20to%20DfT%20MRN%20consultation%20DRAFT%20v0 3..pdf

<sup>&</sup>lt;sup>7</sup> For more information see:

- Greater transparency on the balance that TfN and other northern stakeholders envisage between long-term investment in the inter-urban transport network and investment on the local or intra-urban transport network, and the extent to which these investments complement each other or involve trade-offs in funding
- Similarly, a clear description of the benefits which can be achieved by increasing the funding available for infrastructure maintenance (e.g. to improve reliability) versus investment in new transport infrastructure
- Setting a clear vision for inter-urban bus travel in the north in the context of the Bus Services Act, and options for tackling the serious challenges that exist around bus funding
- Describing (e.g. through mapping) how transport infrastructure investment helps to address regional and sub-regional patterns of economic and social deprivation
- Examining how the focus on smart ticketing and real-time travel information can drive sustainable modal shift for the 'last mile' part of journeys

## Expanding the use of scenario modelling

- 19. The STP could move further towards a 'Vision and Validate' approach by bringing using information from the Integrated Sustainability Appraisal to demonstrate how Scenario 1 (Compact and Digital) performs on key sustainability criteria, and how this has informs the choice of interventions proposed in the STP. These should be explicitly linked to the legal requirements of the 2008 UK Climate Change Act, with explicit targets in the STP which demonstrate how integrated transport and land use planning will drive the decarbonisation of the northern transport network in line with the interim carbon budgets agreed by government. This will also support the plans of Greater Manchester and other northern city-regions to move towards carbon neutrality and meet legal requirements for air quality.
- 20. The STP should also use scenarios modelling to test the impact of different demand management policies on traffic levels, carbon emissions, air quality and the capacity of public and active transport infrastructure. This could include different road pricing options, the implementation of congestion charging zones and other measures to promote air quality in metropolitan regions, increased fuel costs, and the use of maximum parking standards in housing developments and urban centres.
- 21. The STP will need to consider the extent to which Connected and Autonomous Vehicles (CAVs) may obviate the need for capacity upgrades on the road network, and develop policies and governance options to support the integration of CAVs into a wider sustainable transport network (e.g. for journeys on the strategic network, or to support rural and last mile connectivity where other options are not available).

### Greater clarity on the balance on northern transport investment

22. While primarily concerned with the inter-urban transport network, the STP recognises the importance of local, intra-urban journeys and their impact on the strategic network. However, the balance to be struck between inter- and intra-urban contributions to the regional economy is not explored. Similarly, the balance between investment in new infrastructure and the maintenance of existing infrastructure – which is itself a strategic issue - is not explored in sufficient depth. Given the limited resources for transport investment this is a potential weakness of the STP.

#### The wider role of TfN

23. As the first sub-national transport body in England, TfN can use its voice to advocate for well-resourced planning departments in local and combined authorities, which are needed to promote integrated spatial planning and encourage sustainable settlement growth across the north of England. We welcome TfN's role on the steering group of the RTPI/IPPR North 'Great North Plan' project, which responds to a demand from stakeholders across the north for a plan which can help to turn the Northern Powerhouse concept into a reality. The RTPI and IPPR North advanced this agenda in 2016 with the publication of the Blueprint for a Great North Plan.8 This resulted from 18 months of engagement with business, local government and other key stakeholders, and demonstrated how such a plan could be developed and what it should consist of. It lead to a number of distinct work streams which cover different aspects of the Great North Plan, including: a 'Vision for the North'; strategies for transport and the economy, northern natural assets, and people and place; a prospectus for investment; and governance. TfN are leading on the transport strategy and have shown a welcome commitment to supporting the development of integrated strategies across other related sectors.

# **Engagement with the UK Nations**

24. TfN should consult and discuss the STP plan with the Scottish and Welsh governments, not only to explore cross border activities but also to ensure that the ramifications of major decisions made in the North of England are proofed for their impact in Scotland and Wales, and vice versa. This is particularly important given the ongoing review of the National Transport Strategy in Scotland and the forthcoming review of the Scottish National Planning Framework, and the production of a National Development Framework in Wales. The TfN Strategic Transport Plan should also take cognisance of other related strategies in the UK Nations, including the Scottish National Marine Plan and Infrastructure Investment Plan as well as the work of the Regional Transport Partnerships and City Region Deals in Scotland.

<sup>&</sup>lt;sup>8</sup> See rtpi.org.uk/greatnorthplan