



new infrastructure. These can be funded through a number of sources and the SDP should set out the principles to be applied in respect to developer funding.

7. Consequent to the previous addendum to NPPG 17, the predecessor of SPP 17, relating to Parking Standards, the new guidance formalises the significance of parking in achieving strategic demand management objectives and advocates that SDPs for the City Regions should incorporate such standards where relevant.

### **Planning for Strategic Roads**

8. SDPs should aim to reduce the need to use the strategic road network for short journeys. Significant travel generating developments should be integrated into the local transport infrastructure to ensure that they are not dependant on being served by trips on the strategic roads network.
9. There is a general presumption against the building of any additional motorway or trunk road junctions, unless there is a national need.

### **Planning for rail, sea and air**

10. The guidance generally recommends better liaison between Local Authorities and the relevant bodies who are in charge of these modes of transport.

### **Local Development Plans and Transport projects**

11. The second section of the document deals with the relationship between LDPs and transport issues. A response to these issues will be the remit of the individual Local Authorities.

### **Main Issues**

12. Given the singular focus of the Guidance on the integration of land-use and transport and particularly its acknowledgement of the relevance of that process in the City-Region context, it is surprising that the Guidance ignores the central role of Regional Transport Strategies (RTS) in integrating with SDPs. Whilst SDPs can guide the long-term distribution of development to accessible locations, and whilst they can set the framework for land reservations and safeguarding for transport projects through LDPs, the primary implementation vehicle for the transport content of the SDP is the RTS. This approach would also be in line with the stress that would appear to be evolving in terms of the New Planning Bill where Strategic Planning Authorities will be expected to publish Action Plans as part of the SDP process. It is therefore important that SPP 17 reflect the focal role that RTSs will play as sister documents to the SDP.
13. The process established by the WESTRANS - SPT partnership and the strategic Planning Authorities in the west of Scotland provides the exemplar for this integrated approach. The Glasgow Clyde Valley Joint Structure Plan Committee and the Ayrshire Joint Structure Plan Committee have already adopted and have approved Development Strategies which are shaped around the type of guidance which SPP 17 advocates. The delivery of the transport elements of these Plans have now been structured into an action programme in the draft RTS which has formally been approved for consultation by both the WESTRANS Joint Committee and the SPTA.
14. The second real issue for the Joint Committee relates to the recommended inclusion

in SDPs for City Regions of maximum parking standards. This inclusion is consistent with the statutory remit of Structure Plans, where demand management exercised through development locations, is regarded as an appropriate policy mechanism. Given the focus of national guidance and the Approved Plan on the regeneration and renewal Town and City Centres, it would seem consistent with these objectives that their accessibility is managed to control private car usage and manage congestion. At the same time, such focused control may have the effect of creating a tension between regeneration of Town and City Centres and a demand for car-borne accessibility to non-Centre retail locations; in effect, counteracting the aim of such demand management. Under this argument, maximum standards need then to apply comprehensively to all retail locations, whether Centre or non-Centre-based. The inclusion of comprehensive standards in the Review, as a policy adjunct to retail policy, would provide the development framework for the work of the WESTRANS/SPT partnership in developing and implementing the RTS.

## **Conclusions**

15. SPP 17 gives more formality to the role of SDPs in setting out transportation Policy where it would have a major affect in achieving specific Planning aims e.g. Maximum parking standards in Town and City Centres. However as currently formulated, it adds little to NPPG 17 in terms of new guidance, other than to re-stress the integration of land-use and transportation in the Development Plan process. As such it should reintroduce the explicit thinking that was built into NPPG 17 that was used in the formulation of Schedule 3 on the Structure Plan about the hierarchy of movement and location of development.
16. In the case of the GCVJSPC, the provisions of the guidance are already cornerstones in the Joint Committee's Structure Plan. In terms of the Review of the Structure Plan, there is a case for including maximum parking standards so as to provide a framework and a support for the development and implementation of a Parking Strategy, to which the WESTRANS Joint Committee is already committed.
17. A singular failure to acknowledge the role of the Regional Transport Strategy process as intimately linked to the SDP process, is a major omission in SPP 17 as currently drafted. The inclusion of additional guidance highlighting the importance of this linkage would serve to strengthen the integration between land-use and transportation, particularly if the RTS process is to fulfil the role of the transport Action Plan component of the SDP.

## **Recommendations**

18. It is therefore recommended that the Joint Committee approves this report as the basis of a response to this consultation and highlight the need, in terms of **delivery** of the transport objectives of the joint Authorities, to draw a clear formal linkage in guidance between SDPs and RDP processes.

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