

## COMMISSION FOR INTEGRATED TRANSPORT

### DRAFT RESPONSE TO THE GOVERNMENT'S WHITE PAPER: 'PLANNING FOR A SUSTAINABLE FUTURE'

*Text (below) of a letter from Peter Hendy, Chairman of the Commission for Integrated Transport, to The Rt Hon Hazel Blears, Secretary of State for Communities and Local Government, and copied to The Rt Hon Ruth Kelly, Secretary of State for Transport*

***"The Commission for Integrated Transport (CfIT), which I Chair, is pleased to submit the attached response to your Department's 'Planning for a Sustainable Future' White Paper consultation, published in May 2007. CfIT has a keen interest in the White Paper, given the impact of land-use planning on transport provision, and I hope that our response provides an influential contribution to the debate.***

***"I am forwarding a copy of this letter and CfIT's consultation response to The Rt Hon Ruth Kelly, Secretary of State for Transport."***

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#### **Introduction to Planning White Paper Response**

##### **About the Commission**

The Commission for Integrated Transport (CfIT) is an independent body which advises Government on transport policy. CfIT takes a broad view of transport policy and its interface with wider Government objectives for economic prosperity, environmental protection, health and social inclusion. The Commission provides expert advice supported by independent research. [A list of Commissioners, and their respective roles, is attached at Annex B to this document].

CfIT's remit is as follows:

- Providing policy advice via evidence-based reports on:
  - Future policy options, so-called 'blue-sky thinking' on future strategic issues
  - Policy issues spanning departmental boundaries (i.e. environment, social, etc.)
  - Best practice amongst local authorities/delivery agencies to encourage improved performance and to highlight barriers to best practice
  - Comparisons with European/International policy initiatives and dissemination of best practice
  - The impact of new technology on future policy options
  - Specific issues as requested by the Department for Transport (DfT)

- Refreshing the transport debate, based on published reports and with a view to raising the overall level of 'The Transport Debate' and where possible to build consensus among stakeholders.

### **'Planning for a Sustainable Future' White Paper**

The Commission welcomes the opportunity to comment on the Planning White Paper ("the White Paper") consultation by the Department for Communities and Local Government. Given the inevitable cross-cutting issues, we also welcome the fact that the White Paper is being promoted jointly by the Secretaries of State for Communities and Local Government; Transport; Environment, Food and Rural Affairs; and Trade and Industry (now the Department for Business, Enterprise and Regulatory Reform).

CfIT has a keen interest in the White Paper given its remit for cross-cutting issues and its members' experience of the impacts of land-use planning on transport provision. The Commission has considered both the Barker Review of Land Use Planning<sup>1</sup> ("Barker") and the White Paper with regard to the likely impacts on transport in England and in terms of research that might usefully be undertaken to extend knowledge of the issues.

CfIT is also able to draw on its experience of providing evidence-based advice, having commissioned previous studies on broader issues relevant to the White Paper. These studies sought to address, alongside other priorities, ways of delivering more cost-effective and timely delivery of major transport schemes. A summary of the research conducted and the key conclusions reached is at Annex A. All are available on CfIT's website – [www.cfit.gov.uk](http://www.cfit.gov.uk) – and appropriate references are provided.

CfIT's response to the White Paper is provided below. This should be taken as a general paper that addresses the key consultation questions of relevance to strategic transport planning, and on which the Commission has reached a consensus view.

### **CfIT's Response to the Planning White Paper**

#### **Context**

1. CfIT has been keen to assess the implications of the White Paper and Barker in the context of both the Eddington Transport Study<sup>2</sup> ("Eddington") and the Stern Review on the Economics of Climate Change<sup>3</sup> ("Stern"). Each of these policy areas interact, and policy should be consistent and reinforcing. The publication of Eddington followed a similarly rigorous and independent review of the effect of transport policy on economic growth in

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<sup>1</sup> [http://www.hm-treasury.gov.uk/independent\\_reviews/barker\\_review\\_land\\_use\\_planning/barkerreview\\_land\\_use\\_planning\\_index.cfm](http://www.hm-treasury.gov.uk/independent_reviews/barker_review_land_use_planning/barkerreview_land_use_planning_index.cfm)

<sup>2</sup> <http://www.dft.gov.uk/about/strategy/eddingtontstudy/>

<sup>3</sup> [http://www.hm-treasury.gov.uk/independent\\_reviews/stern\\_review\\_economics\\_climate\\_change/sternreview\\_index.cfm](http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/sternreview_index.cfm)

the UK. Eddington set a challenge for Government to deliver sustainable development over future decades, and one of its recommendations was to reform the planning process for Major Infrastructure Projects (MIPs). For its part, Stern assessed a wide range of evidence on the impacts of climate change and on the associated economic costs. Particularly noteworthy is Stern's conclusion that the economic investment that takes place in the next 10-20 years will have a profound effect on the climate in the second half of the 21<sup>st</sup> century, and in the next. Therefore, both Eddington and Stern provide a long-term context for transport.

### Changes to the Planning Framework

2. CfIT is very supportive of the proposed improvements to the planning system for key national infrastructure projects. CfIT welcomes the proposals for the development of MIPs and the supporting architecture, comprising national policy statements and the delegation of decisions on MIPs to an Independent Planning Commission. This new system should facilitate decision-making on major infrastructure development in a much more timely and efficient way, de-politicise decision-making at the sharp end and seek to ensure that the nation gets the sustainable infrastructure it needs. This, in turn, supports economic development, employment and national prosperity.
3. CfIT notes that the White Paper proposes that promoters of 'nationally significant infrastructure projects' should be required to prepare applications to a defined standard before the infrastructure planning commission agrees to consider them. However, this does provoke the question of how key projects are defined (i.e. what thresholds are proposed?) and whether this process will have sufficient capacity to process them.
4. It is also important to note that for certain types of transport projects – particularly local major schemes for both roads and public transport – the availability of funding is a significant delaying factor.

### Assumptions

5. CfIT does, however, have some concerns. The Barker framework is likely to be highly sensitive to the economic assumptions on which it is based. Barker is predicated on a particular set of assumptions about population, household and global economic growth, as well as climate change policy. Barker articulates these assumptions very well. But if economic and population growth is slower than anticipated, or if people exercise their choices over where and how to live and work differently because of carbon constraint, then the future demand could be very different.
6. Whether Government accepts these same assumptions is not clear in the White Paper, but CfIT's view is that these assumptions should be subject to greater scrutiny, and sensitivity testing, before they are used as the basis for the national policy statements and planning guidance. There

needs to be some consideration as to whether the forecasts used by Barker reflect trends which are inevitable or desirable and whether Government policy might evolve to influence these trends.

7. Greater encouragement of housing and economic development in the Midlands and North (rather than the South East) could make use of brownfield sites there, and maximise use of existing investment in transport and social infrastructure - thus reducing the incremental cost of any additional investment needed to support growth. It would also help meet the wider Government objective of reducing disparities between regions. Further investment, where it could be justified, in the strategic road and rail networks to improve connectivity with London and the South East could additionally improve the attractiveness of areas north of London to inward investment in a global economy, and reduce the extent to which agglomeration benefits are seen to apply only in the South East.
8. The perceived pressures for housing and economic growth that the White Paper is seeking to facilitate are capable of being substantially shaped by land-use/transport planning, and wider economic and regional planning. CfIT therefore supports a land-use planning system based on a 'predict and decide' approach, as opposed to 'predict and provide'. For this reason, CfIT welcomes the parallel Review of Sub-National Economic Development and Regeneration<sup>4</sup>, announced by the Chancellor of the Exchequer in the March 2006 Budget to inform the 2007 Comprehensive Spending Review. This should promote greater economic prosperity in every region and at every level, reducing disparities in the poorest performing regions.

#### Relationship to Eddington & Stern

9. CfIT acknowledges that the White Paper recognises its role as a policy response to the recent independent policy reviews, particularly regarding Barker, and to a lesser extent, Eddington and Stern. The White Paper is designed to generate a more robust planning system which is more strategic in outlook and is more efficient in delivering infrastructure aligned to economic growth.
10. The White Paper shares some common stated principles with Eddington and Stern. It is looking to streamline the planning system in the way which both Eddington and Barker suggested. It also uses the language of climate change mitigation, acknowledging that the planning system has an important role to play in enabling the UK to meet its climate change challenges. In its statement of principles, the White Paper states that planning can help to accelerate the shift to renewable and low-carbon forms of energy. However, the Commission is concerned that, in its proposal to remove the 'need' criteria (covered in detail below) from the local planning process, there is a risk that developers will be offered an incentive to build speculatively where land is cheaper and thus having

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<sup>4</sup> [http://www.hm-treasury.gov.uk/spending\\_review/spend\\_csr07/reviews/subnational\\_econ\\_review.cfm](http://www.hm-treasury.gov.uk/spending_review/spend_csr07/reviews/subnational_econ_review.cfm)

potential to stimulate renewed out-of-town and edge-of-town development. CfIT's previous work on transport and the retail sector (referenced in Annex A) identified that trips undertaken to edge-of-town and out-of-town retail centres and large supermarkets are predominantly made by car. Scenarios around residential, employment and health provision dispersal, as implied by Barker, are likely to lead to similar examples of car-dominated mode dependency.

### Removal of the 'Need' Test

11. The Commission welcomes the principle of strengthening the 'town centres first' policy, but sees a danger of the White Paper diverging from both Eddington and Stern in its proposed removal of the 'need' test for development. This is the test under which a planning authority can refuse a development on the grounds that the need for development is already met. It has been argued that where there are large edge-of-town developments, the 'need' test is inhibiting countervailing investment in town centres. This also applies to edge-of-centre developments that may be much less suited to the sustainable modes than city centre ones. CfIT accepts that if this undesirable, and presumably unintended, effect of the 'need' test is at work, it should be fixed. However, the 'need' test is also used to resist the proliferation of competing edge-of-town developments. CfIT believes that the Government should further consider whether the 'town centres first' policy, on its own, gives local planning authorities enough power to resist the proliferation of additional peripheral development. In saying this, we accept the logic for vigorous competition, but the Commission would prefer that development occurred in towns, not on the edge of towns, in order to avoid having a single, local monopoly retailer promoting intensive edge of town development.
12. Unless the replacement test is very carefully constructed, the Commission is concerned that there is potential for the stimulation of renewed out-of-town development, since removal of the 'need' test would otherwise offer developers a clear incentive to build speculatively, especially where the wider costs, including congestion and emissions, can be externalised to the Government or wider economy. The 'town centres first' policy would then be under some threat.
13. The reasoning underlying this view is that CfIT is concerned about the difficulty in providing sustainable transport solutions to support more dispersed development. The transport system will continue to be exposed to significant 'spillover' effects in terms of changing patterns of demand. Congestion and pollution levels, in particular, could also rise. It is very difficult and, where it is possible, very costly to provide sustainable transport to more dispersed development, since those developments encourage car-use, as evidenced by our own research on the retail sector. The key point here is that walking, cycling and, in particular public transport, are most suited to central area destinations where journey times are competitive and operating costs are efficient.

14. In CfIT's view, both Eddington and Stern imply a re-intensification of land-use. Eddington states that the strategic economic priorities for long-term transport policy should be aligned to growing and congested urban areas and their catchments; and the key inter-urban corridors and key international gateways where there are acute signs of congestion. Eddington's evidence also suggests that stronger regional centres, particularly large regional cities in the Midlands and North, could have an important role to play in a vibrant economy. In the case of Stern, the recommendation is that land-use planning and performance standards should encourage both private and public investment in buildings and other long-lived infrastructure to take account of climate change. In CfIT's view, a replacement for the 'need' test which led to more dispersed land-use would counter Stern's logic. Indeed, the secondary effect of long-term mode shift caused by allowing development in locations with an implied mode share weighted towards the car would have detrimental climate change implications.
15. In order to address the kinds of growth pressures which Barker identifies in a way which is most compatible with Stern, CfIT feels that there should be some weighing of the relative carbon impacts for proposed major developments. The idea would be to develop a toolkit for assessing the carbon impacts of new settlement locations and designs so that the best means on offer of accommodating the necessary growth was identified. There may be a role for the new Climate Change Committee, proposed by Government in its draft Climate Change Bill, in advising Government on setting the criteria for assessing the carbon impacts of schemes.

### **Potential Research Projects**

16. CfIT considers that it would help to take the planning regime forward if further research was conducted. The interaction between regional/local land-use planning, and the maximisation of sustainable transport, is probably not as well understood as it needs to be. Addressing gaps in the knowledge base would give us a clearer picture of the costs and benefits of the White Paper's approach with regard to transport and aid future Government thinking. A specific research area of relevance and interest to CfIT is suggested, prompted by the following questioning:
- ***What does the contemporary research have to say about the impacts on regional-level settlement pattern and the actual structure and design of settlements in terms of the demand for travel? Also, what regional policy approach would most closely align strategic planning to a post-Stern world?***
17. In addressing this, Barker observes that "In general, there is the need to establish a more robust evidence base for national policy, so that the costs and benefits of the policy can be better assessed". CfIT agrees, and we feel that this is a key area of deficiency. There is conflicting evidence in this area. Assuming that substantial growth is to occur and to be accommodated, there are large potential variations in the resulting

demand for travel arising from planning and demand choices. These should be investigated.

18. The regional policy approach to planning in a post-Stern world poses an important and, as yet, under-researched question. Evidence from elsewhere suggests that stronger regional centres could have an important role to play in the strategic planning context. This may be worth pursuing.
19. Overall, CfIT sees merit in pursuing this as a single research proposition, and we will be discussing the viability of this approach with the Department for Transport.

***Commission for Integrated Transport  
17 August 2007***

**PREVIOUS CfIT STUDIES RELEVANT TO THE PLANNING WHITE PAPER**

**July 2006: “Sustainable Transport Choices and the Retail Sector”**

<http://www.cfit.gov.uk/docs/2006/stc/index.htm>

CfIT’s study addressed how different transport modes impact on the retail environment. In particular, the study looked at the impact of the shopping behaviour of car drivers on congestion and accessibility at retail and leisure sites. The study showed that bus users, cyclists and walkers supported town centres the most. It also demonstrated that 85% of shoppers travelling to out-of-town retail parks arrived in their cars.

Among its conclusions, CfIT recommended that planning decisions should give precedence to existing town/city centres, in line with planning guidance on transport and retail development, to encourage shopping around public transport hubs and population centres. CfIT further recommended that local authorities should carefully consider planning requirements for existing out-of-town retailers and supermarkets such as stipulating public transport provisions and/or affordable home delivery services to reduce the need for car travel.

**September 2005: “Affordable Mass Transit – Guidance”**

<http://www.cfit.gov.uk/docs/2005/amt/index.htm>

This guidance was designed to assist promoters of mass transit systems to select the most suitable, affordable and cost-effective technology to meet their needs and objectives, and to do so quickly and at reasonable cost. It provides an overall structure for the decision-making process; indicates the nature of decisions that should be made; provides the information required to support the decision-making process; and identifies and details information sources, together with advice regarding areas where information is currently unavailable.

**2003: “Potential Improvements to Transport and Works Act Procedures”**

<http://www.cfit.gov.uk/docs/2003/10ms/index.htm>

This study undertook a brief analysis of the problems which arise from using the Transport and Works Act 1992 as a means for authorising major transport infrastructure projects. Among the key conclusions were that major schemes were taking around 6 years from the start of feasibility studies to commencement of construction; that the time from public inquiry to the Secretary of State's decision was critical for most major schemes; and that the former ‘Office of the Deputy Prime Minister’ needed the resources and certain changes in practice to deliver decisions within the target 6 months from Inspector's Report to decision.

**April 2002: “CfIT Response to the Planning Green Paper”**

<http://www.cfit.gov.uk/docs/2002/planning/index.htm>

CfIT was asked to respond to the Government’s 2001 Green Paper “Planning: Delivering a Fundamental Change”. CfIT’s focus was on the key transport issues arising from the planning system, most notably delays in delivering major projects, inadequate integration of transport, delivery of integrated regional transport strategies and gaps between land-use and transport planning.

**The Commission for Integrated Transport**

The Commission for Integrated Transport (CfIT) was set up in 1998 by the Government as an independent body. It advises government on strategic policy issues, encourages best practice, and aims to keep the transport debate refreshed and meaningful to the transport sector and public alike.



**Peter Hendy, (Chair)**  
Managing Director of Surface Transport at Transport for London



**David Leeder (Vice-Chair)**, Managing Director, First Group Plc's UK Bus Division, member of the First Group plc Board & Board Member of the Confederation of Passenger Transport



**John Armitt CBE**, Chief Executive of Network Rail



**Neil Betteridge**, Chair of the Disabled Persons Transport Advisory Committee, Chief Executive - Arthritis Care



**Harry Bush**, Group Director of Economic Regulation at Civil Aviation Authority



**Gerard Docherty**  
General Secretary, TSSA



**Garrett Emmerson**, Head of Transportation at Buckinghamshire County Council. Member of Transport Advisory Groups for Local Government Association and the South East Regional Assembly



**Paul Godier**  
Former Chief Executive of Bournemouth Borough Council, former Managing Director of London Underground



**Helen Holland,**  
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**Michael Roberts,**  
Director of Business Environment, Confederation of British Industry  
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**Archie Robertson OBE,**  
Chief Executive of the Highways Agency



**Neil Scales,**  
Chief Executive and Director General of Merseytravel, the Merseyside  
Passenger Transport Authority and Executive



**Andrew Sentance**  
Monetary Policy Committee member



**Lyn Sloman**  
Partner at Transport for Quality of Life



**Richard Turner,**  
Former Chief Executive of the Freight Transport Association. Board  
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