



for sustainable transport

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Dear Sir/Madam

Review of the Scottish Planning System: Call for Written Evidence

We have two comments to make, both with regards to how sustainable transport requirements relate to the planning system:

1. The need for better integration between land use planning and transport planning:

With regards to 'Development Planning' (review question 1), we are in favour of the 'city-region' approach currently in place, with Strategic Development Plans for Scotland's four major cities, led by Strategic Development Planning Authorities.

It is impossible to expect good integration between development planning for the cities with transport planning for these same areas unless and until there is better integration between these functions, both in terms of geographical coverage and in terms of the powers that they hold.

However, there is a serious mismatch with regards to planning for sustainable transport, where the approach remains for 'Regional Transport Partnerships' covering much larger areas, their having very limited powers, almost no capital budgets, in general with very limited public awareness, with no specific focus on city-regions, and with no obvious relationship to the Strategic Development Planning Authorities.

We would welcome the Panel's consideration of the merits of a move to city-region transport planning authorities, covering the same geographical areas as the Strategic Development Planning Authorities, and perhaps even involving a merger with the SDPAs.

We would note that there would be the need for the retention of a transport planning authority for the Glasgow conurbation (a role currently provided by SPT), but with enhanced powers, and consider that similar authorities are required for the Edinburgh city-region and perhaps also for Aberdeen and Dundee. We would note that The City of Edinburgh Council have in recent years put in place the 'Transport for Edinburgh' body for the city; an expanded version of this, covering the Edinburgh travel-to-work area, might be an appropriate foundation for this approach for the south-east Scotland area.

2. The need for improved monitoring of planning decisions against Scottish Government policies

With regards to 'Community Engagement' (review question 6), we would agree with the contention that the "public's perception of planning remains mixed". This would certainly be general view of many of our member organisations.

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Transform Scotland is the national alliance for sustainable transport, bringing together the public, private and voluntary sectors.

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While the Scottish Government has many fine policies in place – in particular, we would highlight *Designing Streets* and *Scottish Planning Policy* itself – we see little being done to monitor whether decisions taken by planning authorities are in line with the policies set out in these documents. In particular, we would highlight the continued consenting by planning authorities of new car-dependent housing (running counter to the principles set out in *SPP*) and vehicle-centric street designs (running directly counter to the people-centred principles that underpin *Designing Streets*).

We consider the failure to adequately monitor whether planning authorities' decisions meets the principles set out in these policy documents brings the planning system further into disrepute. We consider that there is little point in the Scottish Government setting out well-meaning policy principles in guidance documents if these are then flagrantly ignored by planning authorities.

I hope these views are of use to the Panel. We would be happy to provide further written evidence as required.

Yours faithfully,



Colin Howden
Director, Transform Scotland

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