

Consultation on Local Transport Plan 3 Guidance

- Response from the Campaign for Better Transport

Key recommendations

1. The framework for local transport plans (LTPs) needs to include strong incentives for local transport authorities to produce and deliver good plans that meet DaSTS goals. Without approval of LTPs by DfT nor funding linked to successful planning or delivery, there needs to be stronger methods to manage performance or ensure accountability of local transport authorities. Given reduced staffing for Government Offices (GOs), DfT should consider a more effective way that performance by local authorities (LAs) can be managed.
2. In particular, stronger methods are needed for managing performance on reducing CO2 from transport, linked to national indicator 186 on a per capita reduction in CO2 in the area.
3. Accessibility planning needs to be a requirement with the guidance.
4. Whilst the policies and best practice handbook is welcome, this needs to form part of a wider package of support and advice to LAs. This should include
 - addressing sustainable transport's inclusion in LTPs;
 - taking full advantage of powers to improve bus services under the Local Transport Act;
 - integrating spatial planning with transport planning.
5. Support is also needed to help LAs address how LTP delivery is funded.
6. LTPs accountability to local communities (and links to other local structures) needs to be clarified.

About Campaign for Better Transport

Campaign for Better Transport is the leading transport NGO. Our compelling arguments and ideas have won us the support of national decision-makers and local activists, enabling us to secure transport policies and programmes that improve people's lives and reduce environmental impact.

This consultation is informed by our engagement with local authorities, regional and local transport and environmental organisations, and transport providers.

Our response

Our detailed response to the draft guidance follows after summary responses to the consultation questions.

1. Is it clear what is required of LAs in producing an LTP...? Overall, the guidance is a helpful document but needs to more clearly set out requirements on performance on CO2, timescales for LTPs, links with LAA and other structures and engaging with stakeholders such as environmental and other voluntary organisations.

2. Does the guidance strike the right balance between brevity and giving support to authorities in developing plans? The guidance should be only a part of a wider package of support for LAs.

3. Does the approach to the Policy Handbook work...? The Policy Handbook should be part of a wider package of support (eg training and advice) to LAs (see detailed comments below on the policy handbook).

4. Is the guidance clear and understandable to a non-transport audience? We support moves to ensure that a wider audience can understand and be engaged with local transport planning, particularly local councillors. DfT should consider commissioning a separate mini-guide to LTP3 for councillors.

Detailed comments

Section 2.8 Environmental policies and guidance

Paragraph 23: We welcome the Department's expectation that local authorities "consider the impacts of their proposals on greenhouse gas emissions in preparing their LTP". However, it is not clear what additional incentives DfT is offering LAs to minimise emissions. For instance, as far as we understand there are no funding implications for reducing or not reducing emissions (see, for example, paragraph 17. of the draft guidance). It is doubtful that what amounts to an exhortation will be effective in addressing climate change through LTPs. The LAA accountability route is indirect (through the LSPs) and only covers a certain number of local authorities as only some have adopted NI 186 on reducing per capita CO2 emissions as a target.

Section 3.2 National transport goals

The national goals in Delivering a Sustainable Transport System (DaSTS) need to say more clearly what success looks like, if they are to be useful to LAs. DfT should consider refining national goals with this in mind.

Paragraph 4: The phrasing of the first sentence suggests that addressing climate change is optional as a goal for LAs. This would conflict with stated government policy elsewhere. Firmer guidance is needed here.

The guidance should say, for instance, that addressing climate change has to be a key aim of LTPs but the way this is achieved can and should be tailored to the needs of a particular area.

Section 3.4 Climate change

Paragraphs 8–11: The carbon pathways analysis is a useful starting point but our experience shows that LAs will need more and different support to help them devise the best ways to reduce CO2 from transport through LTPs. DfT should build on Keith Buchan's *A Low Carbon Transport Policy for the UK* (http://www.bettertransport.org.uk/media/press_releases/november_2008/cutting_emissions) and Jillian Anable's *The Cost Effectiveness of Carbon Abatement in the Transport Sector* (http://www.bettertransport.org.uk/media/press_releases/march_2008/no techno fix). Both reports show that reducing CO2 from transport is feasible and cost-effective. CBT had a central role in ensuring the production of both reports, and we could help the department develop guidance from them. This part of the LTP 3 guidance should also be linked to DfT's emerging carbon reduction strategy and the final guidance should be consistent with the carbon reduction strategy.

Section 3.5 LTP funding

Paragraphs 17-18: Campaign for Better Transport, in conjunction with other NGOs, has proposed that the DfT creates a Carbon Reduction Fund to resource transport projects to reduce CO2 emissions. This could be used to fund good practice in cutting CO2.

Section 3.7 Local government policy

Paragraph 23 refers to the need for LTPs to be aligned with local development frameworks (LDFs). This is essential if LTPs are to be as effective as possible but LAs face considerable challenges in achieving this. LDFs and LTPs respectively are developed to different timescales and by different tiers in the planning system (district authorities and local transport authorities respectively). LAs will therefore need support and advice to achieve this (eg training, good practice examples). It is not clear to us who will provide this support. The regional tier and the GOs would be suitable agencies. However, the sub-national review arrangements are in the process of phasing out those aspects of the current regional architecture which were independent of LAs, with the exception of the RDAs. A package of support at a regional level is needed which needs to engage wider stakeholders in planning and transport strategies and frameworks, including environmental organisations. This would go beyond RDA remits, and GOs' reduction in staffing levels means that they are not best placed to provide this support. **DfT should consider how it could best commission packages of support to align LDFs with LTPs.**

Section 3.8 LTPs and LAAs

Paragraphs 27-28: Close working relationships between LTAs and LSPs are obviously important but the guidance does not explain how this is to be achieved and success monitored. There are two main parts to success in this respect, good practice (content) and rigorous process. Regarding process, there is a need for independent scrutiny. Regarding content, *Meeting Targets Through Transport* (referred to in the Policy Handbook) is a useful starting point. Campaign for Better Transport is running seminars for LAs with the LGIU in 2009, including a seminar sponsored by the DtT on sustainable transport and LTPs. **DfT should consider building on this to help LAs on how transport can help support achievement across many national indicators.**

Paragraphs 31-32: The reference to using the expertise of “partner bodies” is welcome but **the guidance should be amended to include environmental organisations and other third sector organisations** as they too have expertise to offer.

Section 3.10 A new relationship

More flexibility for LAs than the LTP 2 process allowed is welcome but this should be accompanied by a framework which supports local authorities to manage and improve their performance. More guidance is needed in particular to make accountability of LAs to their communities a reality. Transparent information, close engagement with local voluntary organisations and making access to LSPs easier are some of the changes necessary to achieve this.

Chapter 4

Section 4.2 Scope of an LTP

Paragraph 2: The scope encompass both the management of transport supply/infrastructure and also policies on managing demand (including provision of information, smarter choices and pricing), and the **DfT guidance should make clear that LTPs should include transport provision and demand.** This is particularly important because in many local authorities the equation of transport planning and infrastructure planning is still the default position. LAs therefore need a positive steer to embrace more fully the smarter choices agenda, which we know that DfT is committed to. There is of course also much good practice in current LTPs, and this should be built on.

Section 4.3 Spatial coverage

Paragraphs 5: **The Guidance should actively encourage local authorities to set up Integrated Transport Authorities.** ITAs are more likely to have the resources and the expertise needed to develop and implement public transport schemes, including setting up bus partnerships or quality contracts.

Paragraph 6: Permitting LTP boundaries to follow travel patterns rather than automatically following LA boundaries is welcome. District and parish/town councils may be well placed to support small schemes as part of LTPs (walking and cycling initiatives and car parking policies). LTAs should work closely with them.

Section 4.5 Duration of plans

We agree that LAs should prepare both a longer-term strategy (covering 10 to 20 years) and a shorter-term implementation plan. We can see advantages in aligning the latter with the budgeting cycles of public authorities (3 years) or with the 5 year budgets of the Committee on Climate Change (though these will not fit exactly with LTP3 start dates). Whichever timescale is adopted, it will be important for all LAs to work to the same cycle so that benchmarking across areas can be carried out and NGOs and other stakeholders have a better opportunity to become involved (they often operate across LA and LTP boundaries). **DfT should instruct LAs to adopt a common cycle.**

Section 4.6 Governance

Paragraph 17: The emphasis on the “need to involve a wide range of partners” in the preparation of LTPs is welcome. The range of partners should include local transport campaigning groups but also the regional coalitions (called Transport Activists’ Roundtables in many regions) because the latter can help achieve better fit with regional priorities.

Section 4.7 Process of developing LTPs

Paragraph 21: While it is right that defining goals is an essential first stage of LTP preparation, a clearer steer from DfT is needed at this point regarding how the national DaSTS goals filter down to LAs, and the role of regional strategies and LAA targets as well in informing the choice of local goals in an LTP.

Paragraph 24: Support will be needed for LAs to enable them to specify the problems and challenges, and particularly to challenge previous orthodoxies (which are often scheme-focused rather than issue-centred). Without this additional support, LAs are unlikely to be in a strong position to meet, or even identify, future challenges. **DfT should include support for LAs to identify challenges as part of a wider package of support for LAs on LTPs.**

Paragraph 26: The emphasis here that local hubs are not just a transport issue is welcome. Transport planners should work closely with spatial planners and urban design professionals on hubs. Where this has not happened, much money and effort has often had to be invested in retrofitting developments, e.g. support expensive bus services to greenfield business parks when locating employment in the centres of existing settlements would have been less costly and more environmentally sustainable.

Paragraph 28: The reiteration here that LAs should compare policies and packages of options and not just individual schemes is welcome but will need careful monitoring and support. The evidence collected by Campaign for Better Transport in the briefing on RFA2 showed that regions claimed to be following a DaSTS -type approach but were in reality mainly comparing schemes, and mostly highway schemes at that. One key factor in this was the existence of LA wishlists, for which they sought funding through RFA 2. The department will need to give a clearer steer to discourage the carrying over of old (in some cases decades old) transport infrastructure wish lists into LTP 3. (for more information see <http://www.bettertransport.org.uk/system/files/09.03.31.regional-funding-briefing.pdf>). In particular, proper guidance on option identification will be essential.

Paragraph 31: Whilst the recognition that careful monitoring and evaluation is important is welcome (as is the inclusion of measuring greenhouse gas impacts here), LAs will need clear guidance on how to measure CO2 impact of proposals in LTPs. As our evidence-gathering for the RFA 2 briefing has shown, LAs are using widely varying methodologies, some of which producing results so counter-intuitive that they point to flaws in the methods used. It will also be important not to penalise smaller schemes because appraisal is more difficult for them. Research on value for money of smaller schemes carried out by Sustrans, the recognition in the Eddington report that small-scale interventions (often smarter choices) are excellent value for money, and the work CBT have done on NATA should be built on.

Section 4.8 Strategic Environmental Assessment

SEA is a potentially very useful instrument in transport planning. But its effectiveness depends on when an SEA is carried out and how wide a range of stakeholders are involved. We have seen too many examples, at local and regional level, of an SEA carried out as an after-thought, i.e. after the important decisions had been made, and only involving a narrow range of stakeholders. Local communities and environmental NGOs (local and regional) can offer intimate knowledge of the environmental quality of their area and additional expertise, which can usefully supplement that of the statutory environmental agencies. **4.8 should be amended to include local communities and environmental NGOs.**

Section 4.9 Equality Impact Assessment

Paragraph 38: We welcome the statement here that EQIAs are to become “an integral part of devising an LTP” but strongly recommend that this is closely linked to CO2 impact assessments and other environmental quality assessments. If assessments are carried out in this linked way, options can be framed which meet several goals at the same time. In particular, planning for less car-centred travel is likely to improve the quality of the local environment, help disadvantaged sections of the population and reduce CO2.

Section 4.11 Consultation with stakeholders

Paragraph 40. We welcome the statement here that engagement should happen before formal consultation. This is essential for developing an LTP which can be implemented because it is the outcome of an inclusive process and therefore has the support of people in its area. It will be important for this that that consultation includes engagement on setting goals – not just on detailed proposals.

Section 4.12 Partnership working

Paragraph 44. We welcome the fact that this paragraph mentions engaging with the voluntary and community sector. But the way the paragraph is phrased leaves it entirely to the discretion of LAs whether they so engage. There is in our experience a real danger here that those LAs in whose areas engagement is most needed do not engage effectively. Campaign for Better Transport's extensive experience of consultation at local and regional level also shows that local and regional authorities tend to equate ‘the voluntary sector’ and what could be termed the ‘social’ voluntary sector (for examples Age Concern or local disability charities). Recognition is needed that environmental organisations are also part of the voluntary sector. **The second sentence in 44 should be changed from “Local transport authorities may, for example...” to “... should work closely with local and regional voluntary and community groups, including environmental organisations.”**

Section 4.13

D. Rights of Way Improvement Plan

The range of partners involved should be extended beyond the statutory environmental agencies to include local environmental organisations, walking groups such as The Ramblers or footpath associations, and members of Local Access Fora. Including these is likely to ensure LTP planning is based on sound local knowledge (which the statutory agencies do not always have the remit or capacity to ascertain).

4.15 Monitoring performance and target setting

This section should be stronger on accountability to local communities. **The guidance should set out that LAs should publish clear and understandable performance data which the local community can understand.** Performance on walking and cycling is also needed, and advice should be sought on the best way to do that. LAs will need support on setting targets and monitoring performance.

Annex B

DfT should provide more developed support and advice than the brief list here, and commission and shape the level of support rather than rely on consultancies/trade, professional associations to provide this.

Section D Regional or national LA best practice sharing groups

We welcome the recognition that structured partnerships and best practice sharing groups are a key mechanism for facilitating interaction between local authorities and external stakeholders. This is particularly important at regional level as this level allows meaningful sharing, benchmarking etc. However, we are not convinced that the regional improvement and efficiency partnership (RIEP) route is an effective one for developing these partnerships. There is no requirement that RIEPs include external stakeholders, i.e. non-governmental actors, and our experience around the regions shows that they are mostly not included. We therefore urge DfT to develop these valuable partnerships in a more inclusive manner. For environmental and related NGOs, the TARs mentioned earlier are an effective route. Campaign for Better Transport can disseminate DfT messages to this network and provide DfT and local and regional agencies with contacts.

Policies and best practice handbook

The handbook should be part of a wider package of support and training.

Alongside the issues covered, it needs to address:

- Accountability to the community and stakeholders;
- Consultation and engagement;
- Analysing challenges and problems through a DaSTS process;
- Ways to link spatial and transport planning.

Campaign for Better Transport would be happy to help the DfT in looking at further developing the policies and best practice handbook, as well as wider packages of support.

Under the headings in the handbook, DfT should consider the following:

Buses:

- The Department should produce a short, simple booklet aimed at local authorities, which encourages them to use the new powers in the Local Transport Act. The booklet should emphasise that it will not be risky or difficult for them to use these powers. It could explain briefly the benefits of voluntary agreements, statutory partnerships and quality contracts, giving local authorities an indication of why they might choose each of these options.
- The Department and the OFT should also produce a good practice guide to give local authorities and bus companies real life examples of how they can use the Local Transport Act powers. The guide should include case studies such as the St Albans voluntary partnership agreement currently being discussed, and it should evolve over time. It would give authorities and companies an understanding of what is expected of them in partnerships and contracts, and would help them to be clear about what concepts such as proportionality mean in practice.

Freight

- The handbook should cover freight on rail, and not just assume that all freight is by road.

Parking:

- Handbook should also reference the Manual for Streets section on parking here.

Planning

- The handbook could reference Campaign for Better Transport's Masterplanning Checklist on sustainable transport in new developments (see http://www.bettertransport.org.uk/system/files/Masterplanning_Checklist_2008.pdf)

Travel planning

- Needs a reference to the National Business Travel Network

Walking and cycling

- Should mention www.walkengland.org.uk and Cycle England as sources of support.

April 2009

*Campaign for Better Transport. 12-18 Hoxton Street London N1 6NG 020 7613 7720
Registered charity (1101929). Company limited by guarantee, registered in England and Wales (4943428).*