



Development Planning and Management
Transport Appraisal Guidance (DPMTAG)
Peer Review Analysis Report

July 2011

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EXECUTIVE SUMMARY

1. Transport Scotland's Service Improvement Plan for Planning Reform, published in 2009, sets down Transport Scotland's commitment to changes which will contribute to delivering planning reform. One of these is to publish streamlined transport and land-use appraisal guidance and to test the practicality of this guidance with COSLA and other key stakeholders. DPMTAG has evolved through discussion with Development Planners and Transport Planners.
2. A pre-peer review of an early version of the guidance took place in late 2009. The guidance was updated following feedback received from this previous review. Key stakeholders to planning reform were invited to peer review the updated guidance. The 12-week peer review period commenced on 23rd August 2010 and ended on 15th November 2010.
3. This report presents the analysis of the responses received, describing the views expressed by peer reviewers in depth.
4. A total of 49 responses were received from the 65 organisations invited to peer review the guidance, giving an overall response rate of 75.4%. Of these 49 responses, 35 completed questionnaires were received while the remaining responses did not use the questionnaire format. 54% of responses were submitted by Local Authorities (LAs) with the remainder being submitted by Regional Transport Partnerships (RTPs); Strategic Development Planning Authorities (SDPAs); National Parks Authorities (NPAs); Key Agencies (SNH and Historic Scotland); consultancies and others [Network Rail; Society of Chief Officers of Transportation in Scotland (SCOTS), Society of Local Authority Chief Executives (SoLACE); Homes for Scotland, Heads of Planning Scotland and the Scottish Property Federation]. 46 of the 49 responses were received by, or close to, the submission date and were considered in the overall analysis.
5. The questionnaire did not specifically ask respondents if the guidance is welcomed, however, it is worthwhile noting that 83% of respondents stated that it is welcomed. In Chapter 5 other key points raised by respondents have been grouped into the key common themes listed below.
 - Lack of resources to undertake Transport Appraisal. (28 respondents – 1 NPA, 1 Key Agency, 2 RTPs, 4 Others, 4 Consultancies and 16 LAs)
 - Issues with the timing of the Transport Appraisal within the plan preparation process and the length of time to complete Transport Appraisals. (31 respondents - 5 RTPs, 2 Other, 2 SDPAs, 3 Consultancies and 19 LAs)
 - The level of detail for Appraisal of SDPs. (7 respondents – 1 RTP, 2 SDPAs, 1 Consultancy and 3 LAs)
 - Clarity of what is needed for each level of Appraisal to assist in understanding what amount of Appraisal work would be proportionate at each stage. (8 respondents - 1 RTP, 1 Other, 1 Consultancy and 5 LAs)

- Some best practice examples would be helpful and would aid understanding. (8 respondents which include 1 Key Agency, 1 RTP, 1 Other, 1 Consultancy and 4 LAs)
- The guidance presents TS's role as reactive rather than proactive regarding land use development (too protectionist). (7 respondents - 1 RTP, 2 Others and 4 LAs)
- The guidance doesn't portray the cooperative approach that would invite early engagement and the development of partnership working. (7 respondents - 1 RTP, 1 SDPA, 1 Other and 4 LAs)
- Transport Scotland's role - Transport Scotland should be taking on more work responsibility for carrying out Transport Appraisals to assist Planning Authorities. (10 respondents - 1 RTP, 1 Other, 1 SDPA, 1 Consultancy and 5 LAs)
- The definitions of the various level of Transport Scotland 's support are quite confusing and the term "objection" is quite strong. There is an issue with the suggestion that Transport Scotland could potentially remove support. (9 respondents - 1 RTP, 1 Other and 7 LAs)
- The focus of the guidance is on the trunk road network and does not cover the local road network or other modes. (12 respondents - 3 RTPs, 1 SDPA, 1 Consultancy and 7 LAs)

1. INTRODUCTION

- 1.1 Transport Scotland's Service Improvement Plan for Planning Reform, published in 2009, sets down Transport Scotland's commitment to changes which will contribute to delivering planning reform. One of these is to publish streamlined transport and land-use appraisal guidance and to test the practicality of this guidance with COSLA and other key stakeholders. DPMTAG has evolved through discussion with Development Planners and Transport Planners. It does not introduce new guidance, but clarifies how transport appraisal can be interpreted in a development planning and management context. The guidance now forms the basis of Transport Scotland's ongoing engagement on the planning process.
- 1.2 A pre-peer review took place in late 2009. Updates were made to the guidance, following feedback received from this previous review.
- 1.3 The updated guidance was then distributed to a wider group of key stakeholders for peer review. The 12-week peer review period commenced on 23rd August 2010 and ended on 15th November 2010. The list of key stakeholders invited to review the guidance is included at Appendix A. The documents which were issued to peer reviewers are included at Appendix B.
- 1.4 This report presents the analysis of the responses received, describing the views expressed by peer reviewers in depth and also groups the key comments raised into key common themes.

2. OVERVIEW OF RESPONSES RECEIVED

- 2.1 A total of 49 responses were received from the 65 organisations invited to peer review the guidance.
- 2.2 Of these 49 responses, 35 completed questionnaires were received while the remaining 14 responses did not use the questionnaire format. The peer reviewer groups and response rates from each group are presented in the table below.

Table 1 showing the response rate by peer review group

<i>Peer Review group</i>	<i>Organisations</i>	<i>Responses received</i>	<i>% Rate of Return</i>
National Parks Authorities (NPA)	2	1	50
Key Agencies	5	2	40
Regional Transport Partnerships (RTPs)	7	6	85.7
Others	7	6	85.7
Strategic Development Planning Authorities (SDPAs)	4	3	75
Consultancies	8	4	50
Local Authorities (LAs)	32	27	84.4
Total	65	49	75.4

- 2.3 From the above table, it can be seen that overall response rate is 75.4%. It can also be seen that LAs comprised the largest group of peer reviewers and submitted the majority (54%) of the responses. The response rate for LAs was 84%. The response rate was highest from the RTPs (85%) and “Others”. Figure 1 below illustrates the breakdown of responses by peer review group. 46 of the 49 responses were received by, or close to, the submission date and were considered in the overall analysis.
- 2.4 Of the 27 responses received from LAs, 13 were joint transport and planning responses, 10 responses were submitted by a planning official and a further 3 responses were submitted by a transportation official. The remaining response was approved by a Council’s Development Management Sub-Committee.

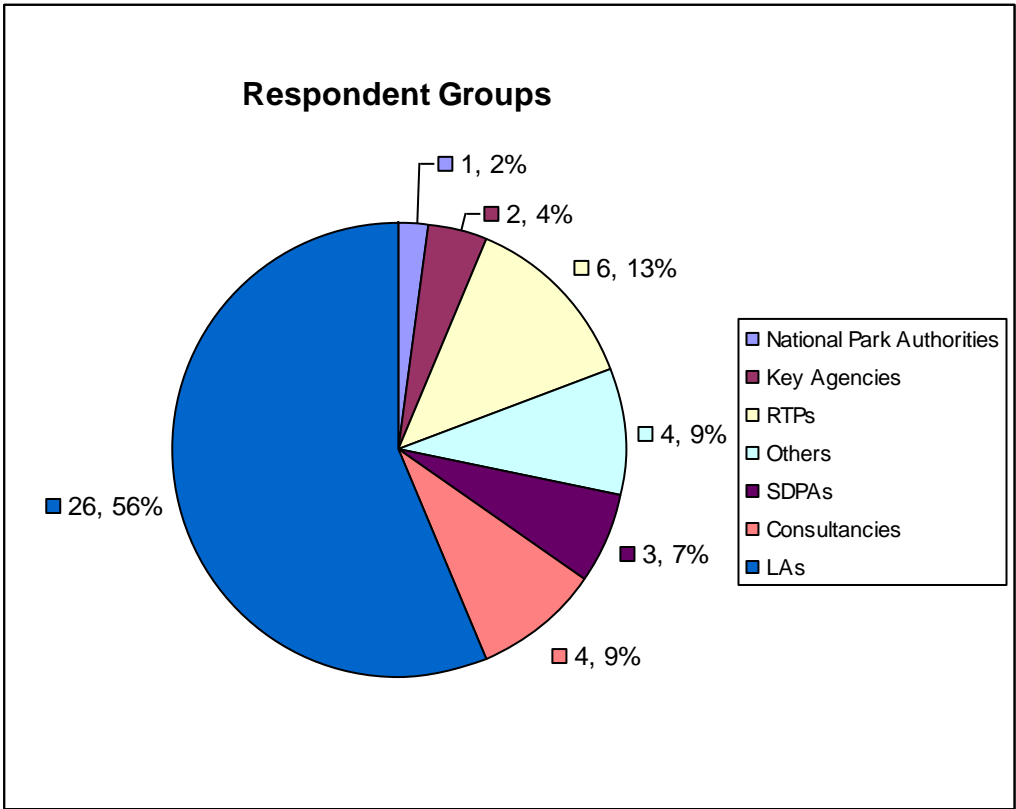


Figure 1 showing the breakdown of responses by peer review group

3. PEER REVIEW QUESTIONNAIRE

3.1 The questionnaire sought the views of the peer reviewers on 14 specific questions. As a result of the variety of response formats, the report concentrates on the main themes emerging rather than details of the individual comments.

3.2 The questionnaire included 14 questions as detailed below.

- How clear and understandable do you consider the draft guidance to be?
- How successful do you think the draft guidance will be in helping users to recognise the benefits of understanding the implications of land use changes on the transport network; and are there ways in which this understanding could be improved?
- How clearly does the guidance set out Transport Scotland's engagement in plan preparation, including the levels of support which Transport Scotland can give?
- Will the draft guidance assist the process of developing strategic and local development plans?
- How clearly does the guidance set out the appraisal for strategic development plans?
- How clearly does the guidance set out the appraisal for local development plans?
- Is figure 1 clear and understandable, and to what extent do you think it captures the principles and processes set out in the guidance?
- How clearly does the draft guidance set out the extent to which transport and land use modelling should be used in the appraisal?
- Are the levels of appraisal set out in Table 2 clear and understandable?
- How appropriate do you consider the three levels of appraisal?
- To what extent do you consider the timescales for delivery of the strategic and local development plans allow for the level of appraisal recommended in the draft guidance?
- Does the guidance clearly set out the need for the economic appraisal of transport options?
- Is there anything further you would like to see in the guidance which would either simplify or further explain the principles of transport appraisal in the development planning or development management context?
- Do you have any further comments not covered by your responses to questions 1 to 14 above? Please note that you may also choose to append any further comments as track changes to the guidance document

4. QUESTIONNAIRE ANALYSIS

- 4.1 The questionnaire did not specifically ask respondents if the guidance is welcomed, however, it is worthwhile noting that 83% of respondents stated that it was welcomed. While this was often followed by further comments this overwhelming support for guidance and transport appraisal confirms that there is a need and appetite for this in the industry.
- 4.2 Responses varied considerably in length and content. The analysis of the responses categorises the key comments raised according to the subject matter and relevance to specific questions posed in the questionnaire.
- 4.3 This chapter focuses on the responses to each of the 14 questions posed by the DPMTAG Peer Review questionnaire. The key comments are outlined taking view of the overall responses and this also includes comments from the respondents who chose not to directly answer using the questionnaire format.
- 4.4 **Out of 46 responses, 38 (83%)** reflect that the guidance is welcomed. These included 1 NPA, 2 Key Agencies, 4 RTPs, 3 Others, 3 SDPAs, 3 Consultancies and 23 LAs.
- 4.5 **Analysis on a Question-by-Question Basis**

Q1 - How clear and understandable do you consider the draft guidance to be?

36 out of 46 (78%) respondents think that the draft guidance is clear and understandable. These included 1 NPA, 2 Key Agencies, 3 RTPs, 2 Others, 3 SDPAs, 4 Consultancies and 21 LAs.

The key comments raised from the above responses are given below.

- For a transport professional perspective the guidance is clear, but the test is whether same can be said from the point of view of developers and planners. (2 responses - 1 RTP, 1 LA)
- The importance of consulting and engaging with TS is also an important aspect for the appraisal to be carried out. (4 responses - 1 RTP, 1 Other, 2 LAs)
- The language of the guidance can be simplified as it is unclear and there is a degree of repetition. Also, the content can be made clearer and easy to follow. (2 responses - 2 LAs)
- Only concentrates on the Strategic Road Network. (2 responses - 2 LAs)
- Availability of resources, financial and timing problems are major issues for the implementation of the guidance. (6 responses - 1 RTP, 1 Others, 4 LAs)

- The guidance could be made clear regarding the types of transport appraisal and level of detail required. (3 responses - 3 LAs)
- It would be useful if some upfront text is included in the guidance relating to the Strategic Transport Network (2 responses - 2 LAs)

Q2 - How successful do you think the draft guidance will be in helping users to recognise the benefits of understanding the implications of land use changes on the transport network; and are there ways in which this understanding could be improved?

27 out of 46 (59%) respondents think that the draft guidance will assist users to recognise the benefits of understanding the implications of land use changes on the transport network. These included 1 NPA, 1 Key Agency, 2 RTPs, 2 Others, 1 SDPAs, 1 Consultancy, 19 LAs.

The key comments raised from the above responses are given below.

- The draft guidance concentrates on the Strategic Transport Network, but gives no detail regarding the appraisal related to Regional/ Local networks. (4 responses - 4 LAs)
- The draft guidance will help and it sets out what is required but there are clear issues of resources, timing of appraisal. (7 responses - 1 RTP, 1 Other, 2 Consultancies and 3 LAs)
- The guidance could be accompanied by training workshops for development planners to develop their skills in applying guidance to developing plans. (1 RTPs)
- Should it not include ferry/bus/ air etc as now TS looks after all the modes of transport in Scotland. (1 RTPs)
- The process would benefit if there is more input and support from TS and a collaborative working practice followed. (2 responses - 1 RTPs and 1 Consultancy)
- On the whole, guidance document would benefit from the examples of good practice which will help to clarify the process and justify the resources. (4 responses - 1 Key Agency, 1 RTP, 1 Other and 1 LA)
- There is no advice on accessibility analysis, prior to option generation, to establish land use patterns that minimise travel and support sustainable development to form a base level. (2 responses - 1 Consultancy and 1 LA)
- TS to take responsibility for the doing the appraisal itself. (1 RTP)

Apart from the above, there were no further key comments to this question.

Q3 - How clearly does the guidance set out Transport Scotland's engagement in plan preparation, including the levels of support which Transport Scotland can give?

25 out of 46 (54%) respondents think that the draft guidance sets out Transport Scotland's engagement in plan preparation, including the levels of support which TS can give will assist the process of developing strategic and local development plans. These included 1 NPA, 2 Key Agencies, 3 RTPs, 2 Others, 1 SDPA, 3 Consultancies and 13 LAs.

The key comments raised from the above responses are given below.

- The definitions of the level of support are quite confusing with the difference in "Support of Principle" and "Conditional Support" not being clear. (6 responses – 1 RTP, 1 Other and 4 LAs)
- The use of term objection is strong and whether TS should provide an objection to the elements of the emerging development plan, but rather indicate the elements which Transport Scotland does not support. (2 responses - 1 RTPs and 1 Other).
- TS's engagement is reactive rather than proactive. (4 responses - 1 RTPs, 3 LAs)
- TS's level of support may reduce if the development site is not supported by TS at the proposed plan stage, or there might be a situation where the development accords with all development plans and then falls at the final TS hurdle. (2 responses - 2 LAs)
- It would be expected that TS would take more responsibility for appraisal work. (5 responses - 1 Other and 4 LAs)
- The guidance doesn't portray cooperative approach that would invite early engagement with a view to joint working and the development of collaborative relationships and further emphasis should be made for partnership working. (3 responses - 1 RTP, 1 SDPA and 1 LA)
- TS focuses only on roads and is not interested in rail, bus and ferry, or other strategic transport links. (2 responses – 1 RTP and 1 Consultancy)
- The guidance would benefit if it is accompanied by training. (1 RTP)
- It is suggested that TS should have flexible approach. (1 LA)
- Procedures and timing are onerous. (3 responses - 1 Consultancy and 2 LAs)

Q4- Will the draft guidance assist the process of developing strategic and local development plans?

25 out of 46 (54%) respondents think that the draft guidance will assist the process of developing strategic and local development plans. These included, notably, 1 SDPA and additionally: 1 NPA , 2 Key Agencies, 2 RTPs, 1 Others, 2 Consultancies and 16 LAs.

The key comments raised from the above responses are given below.

- The guidance will assist in developing strategic and local development plans provided early and continued engagement is undertaken between all the parties in ensuring the guidance is properly understood and followed consistently. (4 responses - 1 RTPs, 1 Other and 2 LAs)
- The guidance will assist the process of developing strategic and local development plans provided both the LA and TS working constructively for the development plan process. (2 responses - 1 NPA and 1 Consultancy)
- The guidance will assist the process, however the implications will be significant regarding complexity, cost, resources in implementing the proposals. (5 responses - 1 Other, 1 Consultancy, 3 LAs)
- Timing of the appraisal is unclear and it is disproportionate (4 responses - 1 SDPA and 3 LAs)
- Clarity regarding the level of appraisal as it is onerous. (2 responses - 2 LAs)
- It is suggested for TS to have flexible and practical approach in line with the proposals. (2 responses - 2 LAs)
- Yes, the guidance will assist but what about ferry/bus/rail/air or other strategic transport links. (1 RTP)
- TS to be more involved in appraisal work and in developing a package of tentative mitigation proposals for consideration and discussion. (1 SDPA and 1 LA)
- Not sure whether scope of guidance will extend to the LA. (1 LA)

Q5 – How clearly does the guidance set out the appraisal for strategic development plans?

29 out of 46 (63%) respondents think that the guidance sets out the appraisal for strategic development plans. These included, notably, 2 SDPAs, 2 Key Agencies, 3 RTPs, 1 Others, 3 Consultancies and 18 LAs.

The key comments raised from the above responses are given below.

- SDPs are vague which will give freedom to LDPs to implement the strategy in a number of ways. There should not be a situation where we have SDPs being approved that prove to be undeliverable at the LDP stage
- Level of detail inappropriate for the SDPs. (2 responses - 2 SDPAs)
- Clarification is needed regarding the level of detail. (5 responses – 1 RTP, 1 Consultancy, 3 LAs)
- Timing of the appraisal is not clear (3 responses - 1 RTP, 1 Other and 1 LA)
- More detailed appraisal at early stages may result in cost transfer from private to public sector. (2 responses - 2 Others)
- Cost and resourcing is an issue for the appraisal for strategic development plans. (2 responses - 2 LAs)
- 4 LAs and 1 NPA indicated “not applicable” in response to this question.
- The guidance could be assisted by providing examples to aid understanding and interpretation of what is required (1 Consultancy).
- SDPs could result in additional infrastructure requirements looking 20+ years ahead. (2 responses - 1 SDPA and 1 LA)
- The guidance should be clear as to when TS expects the appraisal to take place. (2 responses - 1 RTP and 1 Other)
- TS to clarify the circumstances in which appraisal can be made without a transport modelling approach. (1 Other)

Q6 - How clearly does the guidance set out the appraisal for local development plans?

31 out of 46 (67%) respondents think that the guidance sets out the appraisal for local development plans. These included 1 NPA, 2 Key Agencies, 3 RTPs, 1 Others, 3 Consultancies and 21 LAs.

The key comments raised from the above responses are given below.

- Clarification is needed regarding the minimum level of detail. (5 responses - 1 Consultancy and 4 LAs)
- Timing of the appraisal within the overall process may be an issue. (5 responses - 1 RTP, 1 Other and 3 LAs)

- The guidance could be assisted by providing examples to aid understanding and interpretation of what is required. (2 responses - 2 LAs)
- The guidance suffers from the desire not to be overly prescriptive with the result that there is loss of clarity. (2 responses - 1 RTP and 1 LA)
- Cost and resourcing is an issue. (4 responses - 4 LAs)
- Table 2 should include specific requirements for LAs out with the SDP areas that are required to produce an LDP but have no involvement in the SDP. (1 LA)
- Concern that insufficient assessment at the SDP stage could lead to difficulties in actually delivering the planned development through the LDP. (1 LA)
- Appraisal is very onerous, time consuming and resource intensive. (1 LA)

Q7 - Is figure 1 clear and understandable, and to what extent do you think it captures the principles and processes set out in the guidance?

30 out of 46 (65%) respondents think that the figure 1 is clear and understandable and it captures the principles and processes set out in the guidance. These included 1 NPA, 1 Key Agency, 4 RTPs, 1 Others, 1 SDPAs, 2 Consultancies and 20 LAs.

The key comments raised from the above responses are given below.

- In terms of timescale and resources, the level of assessment implied is onerous. (3 responses - 3 LAs)
- Separate figures to show the integration of the process for each plan type of SDP, LDP and LDP outside SDP areas would be helpful. (4 responses - 1 RTP, 1 SDPA, 1 Consultancy and 2 LAs)
- Examples of good practice should be included in the guidance. (1 Consultancy)
- The figure needs some revision to reflect the flow diagram for the development plan process in Circular 1/2009. (2 responses - 2 LAs)
- Figure 1 is clear but consultation with stakeholders prior to the publication of the proposed plan would be helpful as there will be no consultation once the plan is produced. (1 LA)
- Guidance should emphasise teamwork between different transport and development planners. (1 LA)

Q8 - How clearly does the draft guidance set out the extent to which transport and land use modelling should be used in the appraisal?

28 out of 46 (61%) respondents think that the guidance clearly set out the extent to which transport and land use modelling should be used in the appraisal. These included 1 NPA, 1 Key Agency, 4 RTPs, 1 Others, 2 SDPAs, 1 Consultancy and 18 LAs.

The key comments raised from the above responses are given below.

- TS to advice regarding which type of modelling and when it should be required. (4 responses - 1 Consultancy and 3 LAs)
- The guidance is not clear on type of assessment required. (2 responses – 2 LAs)
- Examples of good practice should be included for better understanding of the appraisal.(3 responses - 1 consultancy, 1 Key Agency and 1 LA)
- Focuses only on LATIS and not on other models. (3 responses - 1 RTP and 2 LAs)
- The guidance need to understand respective stakeholders needs and needs to have consultation. (2 responses - 2 LAs)
- The guidance is clear but not all authorities will have an up-to date multi-modal modelling and there is shortage of skills, time and resources. (5 responses - 1 RTP, 2 Other and LAs)
- Justification on appraisal being proportionate and viable in terms of cost. (2 responses - 2 LAs)
- TS should deliver the multi-modal modelling through re-commissioning of National LATIS Model in 2011. (1 Other)

Q9 - Are the levels of appraisal set out in Table 2 clear and understandable?

33 out of 46 (70%) respondents think that the levels of appraisal set out in Table 2 are clear and understandable. These included 1 NPA, 1 Key Agency, 2 RTPs, 1 Others, 2 SDPAs, 2 Consultancies and 24 LAs.

The key comments raised from the above responses are given below.

- The level of appraisal should be proportionate to the scale of development, where there are no significant changes due to development the level of appraisal should be minimum. (responses - 1 RTP, 1 SDPA and 1 LA)

- Clarity is required as the text suggests that Local Planning Authority should undertake Level 2 appraisal as well as Level 3, but Table 2 indicates a Level 3 appraisal only. (4 responses - 1 RTP, 1 Key Agency and 2 LAs)
- Greater flexibility to take account of available time and resources is required. (3 responses - 3 LAs)
- Flow diagram could be helpful to explain how it applies to LDPs and SDPs. (2 responses - 1 Consultancy and 1 LA)
- The guidance is clear but should it not encompass walking/cycling etc. (3 responses – 2 RTPs and 1 LA)
- The table 2 is overly prescriptive and needs to be simplified. (3 responses – 1 RTP 1 SDPA and 1 LA)
- In Table 2, significant junction upgrade should require a level 2 appraisal, however capacity enhancements require a level 1 appraisal. (2 responses - 1 RTP and 1 Key Agency)
- Greater explanation of what is required for the three levels of appraisal would be useful as at present level of appraisal implied in Table 2 is onerous. (2 responses – 2 LAs)
- Timing of the appraisal is not clear. (2 responses - 2 LA)

Q10 - How appropriate do you consider the three levels of appraisal?

27 out of 46 (59%) respondents think that the levels of appraisal set out in Table 2 are appropriate and reasonable. These included 1 Key Agency, 4 RTPs, 2 SDPAs, 2 Consultancies and 18 LAs.

The key comments raised from the above responses are given below.

- Level 2 appraisals require a regional/local multi-modal modelling capacity. This can greatly enhance where these models currently exist but it will be difficult when there is no such model – lack of model. (5 responses - 1 RTP, 1 Other and 3 LAs)
- There should be more clarity on the three levels of appraisal required. (3 responses - 1 Consultancy. 2 LAs)
- Clarity on level of detail for LDPs and level of detail for SDPs. (1 LA)
- Issue with the resources and timing of the appraisal. (2 responses – 2 LAs)
- The level of appraisal depends upon planning authorities, TS to determine what interventions are required. (2 responses - 2 LAs)

Q11 - To what extent do you consider the timescales for delivery of the strategic and local development plans allow for the level of appraisal recommended in the draft guidance?

32 out of 46 (69%) respondents think that the timing of the appraisal will be challenging for the delivery of the delivery of strategic and local development plans. These included 1 Key Agency, 4 RTPs, 2 Others, 1 SDPAs, 3 Consultancies and 21 LAs.

The key comments have already been covered in the previous questions and hence there were no further comments to this question.

Q12 - Does the guidance clearly set out the need for the economic appraisal of transport options.

21 out of 46 (46%) respondents think that the guidance does not clearly set out the need for economic appraisal for transport options. These included 2 RTPs, 2 Others, 3 Consultants and 14 LAs. Only 15 out of 46 respondents think that the guidance sets out the need for the economic appraisal.

The key comments raised from the above responses are given below.

- It does but that is not the role of land use development plans, and also not the role that should be directed solely towards the Development Planning system. (4 responses – 1 RTP, 3 LAs)
- Lack of resources and skills to carry out economic appraisal. (4 responses – 4 LAs)
- Time consuming and cost intensive. (3 responses – 3 LAs)
- The guidance does not clearly mention the need for an economic appraisal as there is no distinct heading and it could be given higher profile and greater emphasise. (2 responses – 1 RTP and 1 LA)
- The guidance needs to include further economic appraisal methodologies and tools. (2 responses - 1 RTP and 1 LA)
- The economic appraisal may not be appreciated by planners and developers because it is onerous, expensive and time consuming. (1 RTP)
- The guidance should highlight the need for appraisal of safety, integration, accessibility and social inclusion and the environment, including carbon reduction. (1 RTP, 1 Other)
- It is unclear whether TS proposes to vet the economic assessments or whether this will be done by Local Authorities. (1 Other)

Q13 - Is there anything further you would like to see in the guidance which would either simplify or further explain the principles of transport appraisal in the development planning or development management context?

The majority of the key comments have already been captured in the previous questions and hence there were only few comments that were considered and are given below, further comments to be included for this question.

- Case studies/ examples of good practice to be included in the guidance. (5 responses - 1 Key Agency, 1 Consultancy and 3 LAs)
- No reference to how SDPAs and Local Planning Authorities should consider STPR projects. (1 RTP, 1 Other and 1 LA)
- A 3 Stage Approach is recommended and would simplify the process. Stage 1 includes accessibility Analysis, Stage 2 includes Analysis of the proposed land uses and Stage 3 includes consideration of the key agency to provide suggested mitigation measures to address the problems. (1 RTP and 1 LA)

Q14 - Do you have any further comments not covered by your responses to questions 1 to 14 above? Please note that you may also choose to append any further comments as track changes to the guidance document.

The majority of the respondents included summary of their responses in this section and they also included general suggestions regarding the text included in the guidance. There are no further comments as most of the key comments have already been captured in the previous questions.

5. KEY COMMON THEMES

5.1 The key points raised by respondents have been grouped into the key common themes listed below.

- Lack of resources to undertake Transport Appraisal. (28 respondents – 1 NPA, 1 Key Agency, 2 RTPs, 4 Others, 4 Consultancy and 16 LAs)
- Issues with the timing of the Transport Appraisal within the plan preparation process and the length of time to complete Transport Appraisals. (31 respondents - 5 RTPs, 2 Other, 2 SDPAs, 3 Consultancies and 19 LAs)
- The level of detail for Appraisal of SDPs. (7 respondents – 1 RTP, 2 SDPAs, 1 Consultancy and 3 LAs)
- Clarity of what is needed for each level of Appraisal to assist in understanding what amount of Appraisal work would be proportionate at each stage. (8 respondents - 1 RTP, 1 Other, 1 Consultancy and 5 LAs)
- Some best practice examples would be helpful and would aid understanding. (8 respondents which include 1 Key Agency, 1 RTP, 1 Other, 1 Consultancy and 4 LAs)
- The guidance presents TS's role as reactive rather than proactive regarding land use development (too protectionist). (7 respondents - 1 RTP, 2 Others and 4 LAs)
- The guidance doesn't portray the cooperative approach that would invite early engagement and the development of partnership working. (7 respondents - 1 RTP, 1 SDPA, 1 Other and 4 LAs)
- Transport Scotland's role - Transport Scotland should be taking on more work responsibility for carrying out Transport Appraisals to assist Planning Authorities. (10 respondents - 1 RTP, 1 Other, 1 SDPA, 1 Consultancy and 5 LAs)
- The definitions of the various level of Transport Scotland 's support are quite confusing and the term "objection" is quite strong. There is an issue with the suggestion that Transport Scotland could potentially remove support. (9 respondents - 1 RTP, 1 Other and 7 LAs)
- The focus of the guidance is on the trunk road network and does not cover the local road network or other modes. (12 respondents - 3 RTPs. 1 SDPA, 1 Consultancy and 7 LAs)

6. **SUMMARY**

- 6.1 A 12-week peer review of the Development Planning and Management Transport Appraisal Guidance (DPMTAG) commenced on 23rd August 2010 and ended on 15th November 2010. Key stakeholders to planning reform were invited to participate in this peer review.
- 6.2 A total of 49 responses were received from the 65 key stakeholder organisations invited to peer review the guidance. The overall response rate was 75.4%.
- 6.3 The key message from the respondents is that the guidance is welcomed. Chapter 4 of this report covers the analysis of the responses submitted by peer reviewers.
- 6.4 The key comments raised by peer reviewers have been grouped into key common themes within Chapter 5.

APPENDIX A

Key Stakeholders invited to participate in this Peer Review

CoSLA

Heads of Planning

Homes for Scotland

National Park Authorities

Key Agencies to Planning Reform:

- Scottish Natural Heritage
- SEPA
- Historic Scotland
- Scottish Water
- Architecture and Design Scotland

Local Development Plan Managers

Network Rail

Regional Transport Partnerships

SoLACE

SCOTS

Scottish Property Federation

Strategic Development Planning Authorities (SDPAs)

Department for the Built Environment (DBE), Scottish Government
and consultancies including:

- Colin Buchanan & Partners
- GVA Grimley
- Halcrow
- JMP
- Knight Frank
- MVA
- Step Consultancy
- WSP

APPENDIX B

Documents distributed to Peer Reviewers

E-mail and documents distributed to new Peer Reviewers:

Transport Scotland's Service Improvement Plan for Planning Reform, published in 2009, sets down Transport Scotland's commitment to changes which will contribute to delivering planning reform. One of these is to publish streamlined transport and land-use appraisal guidance and to test the practicality of this guidance with COSLA and other key stakeholders. This guidance has evolved through discussion with Development Planners and Transport Planners. It does not introduce new guidance, but clarifies how transport appraisal can be aligned with the planning process. This guidance now forms the basis of our ongoing engagement on the planning process. We are happy to meet with any parties to discuss any aspect of the content or application of this guidance.

A 12 week peer review period, involving distribution of this guidance to a wide group of key stakeholders, commences today and closes on Monday, 15th November 2010. A copy of this guidance is attached and you are invited to comment through completion of a questionnaire, also attached. **Please return your completed questionnaire and any other supporting documents to Scot-TAG@transportscotland.gsi.gov.uk by the closing date.** Following consideration of feedback from this review, the aim is to progress to publishing this guidance by the end of the year.

It would be helpful, in the first instance, if you could confirm receipt of this email by reply.

A list of those organisations to whom a copy of this guidance has been sent for peer review is also attached, for your information.

Any meeting requests or queries about the peer review can be sent by email to Scot-TAG@transportscotland.gsi.gov.uk. Alternatively, you can contact Veronica Allan on T. 0141 272 7591 or Alison Irvine on T. 0141 272 7590.

List of organisations invited to peer review Development Planning and Management Transport Appraisal Guidance in August 2010:

CoSLA

Heads of Planning

Homes for Scotland

National Park Authorities

Key Agencies to Planning Reform:

Scottish Natural Heritage

SEPA

Historic Scotland

Scottish Water

Architecture and Design Scotland

Local Development Plan Managers

Network Rail

Regional Transport Partnerships

SoLACE

SCOTS

Scottish Property Federation (SPF)

Strategic Development Planning Authorities (SDPAs)

Consultancies including:

Colin Buchanan & Partners

GVA Grimley

Knight Frank

Halcrow

MVA

Step Consultancy

Peer Review Questionnaire

Please note the following:

- the answer box for each question will extend as you type
- there is no limit set for responses

Please Insert the following:

Name:	
Job Title:	
Name of authority/ organisation:	
Date:	

Contact details:

Address:	
Tel. No.	
Email Address	

Q.1 How clear and understandable do you consider the draft guidance to be?

A.1

Q.2 How successful do you think the draft guidance will be in helping users to recognise the benefits of understanding the implications of land use changes on the transport network; and are there ways in which this understanding could be improved?

A.2

Q.3 How clearly does the guidance set out Transport Scotland's engagement in plan preparation, including the levels of support which Transport Scotland can give?

A.3

Q.4 Will the draft guidance assist the process of developing strategic and local development plans?

A.4

Q.5 How clearly does the guidance set out the appraisal for strategic development plans?

A.5

Q.6 How clearly does the guidance set out the appraisal for local development plans?

A.6

Q.7 Is Figure 1 clear and understandable, and to what extent do you think it captures the principles and processes set out in the guidance?

A.7

Q.8 How clearly does the draft guidance set out the extent to which transport and land use modelling should be used in the appraisal?

A.8

Q.9 Are the levels of appraisal set out in Table 2 clear and understandable?

A.9

Q.10 How appropriate do you consider the three levels of appraisal?

A.10

Q.11 To what extent do you consider the timescales for delivery of strategic and local development plans allow for the level of appraisal recommended in the draft guidance?

A.11

Q.12 Does the guidance clearly set out the need for economic appraisal of transport options?

A.12

Q.13 Is there anything further you would like to see in the guidance which would either simplify or further explain the principles of transport appraisal in the development planning or development management context?

A.13

Q.14 Do you have any further comments not covered by your responses to questions 1 to 14 above? Please note that you may also choose to append any further comments as track changes to the guidance document.

A.14

E-mail and additional documents distributed to Peer Reviewers who participated in Pre-Peer Review in late 2009:

Transport Scotland's Service Improvement Plan for Planning Reform, published in 2009, sets down Transport Scotland's commitment to changes which will contribute to delivering planning reform. One of these is to publish streamlined transport and land-use appraisal guidance and to test the practicality of this guidance with COSLA and other key stakeholders. This guidance has evolved through discussion with Development Planners and Transport Planners. It does not introduce new guidance, but clarifies how transport appraisal can be aligned with the planning process. This guidance now forms the basis of our ongoing engagement on the planning process. We are happy to meet with any parties to discuss any aspect of the content or application of this guidance.

In late 2009, you were invited to review draft guidance (entitled *Development Planning and Management Transport Appraisal Guidance*) and / or attended a related stakeholder workshop. The feedback from the advance peer review group was gratefully received and has informed recent changes to this guidance.

Attached for your information is:

- a brief summary of the key comments received in response to the questionnaire;
- our response to these comments; and
- the report of the stakeholder workshop held on 2/12/09.

A 12 week peer review period, involving distribution of this guidance to a wide group of key stakeholders, commences today and closes on Monday, 15th November 2010. A copy of this guidance is attached and you are invited to comment through completion of a questionnaire, also attached. **Please return your completed questionnaire and any other supporting documents to Scot-TAG@transportscotland.gsi.gov.uk by the closing date.** Following consideration of feedback from this review, the aim is to progress to publishing this guidance by the end of the year.

It would be helpful, in the first instance, if you could confirm receipt of this email by reply.

A list of those organisations to whom a copy of this guidance has been sent for peer review is also attached, for your information.

Any meeting requests or queries about the peer review can be sent by email to Scot-TAG@transportscotland.gsi.gov.uk. Alternatively, you can contact Veronica Allan on T. 0141 272 7591 or Alison Irvine on T. 0141 272 7590.

Pre-Peer Review Questionnaire

Q.1 How clear and understandable do you consider the draft guidance to be?

A.1

Guidance is generally well set out and will be of benefit to the Development Plan process in putting transport appraisal at the start of the development management process.

The length of the report does not assist in the clarity and level of detail provided and while some sections could be simplified the use of more bullet points, tables and process maps would be welcome.

Distinction in guidance between development management (transport assessment) and development plan (transport appraisal) could be more explicit.

The emphasis is on what Planning Authorities should do though there is little information to guide what the Scottish Government will do with regard to national projects. This is important at the SDP level where Transport Scotland has and will be asked to provide information on nation projects, for example those proposed in STPR.

Q.2 How successful do you think the draft guidance will be in helping users to recognise the benefits of understanding the implications of land use changes on the transport network; and are there ways in which this understanding could be improved?

A.2

The guidance will help to ensure that transport implications are identified early in the planning process and highlights the benefits of this early engagement as well as highlighting the implications of land use changes on the transport network. However there are issues surrounding the assumption that resources are available within Local Authorities to undertake this work.

It is hoped that this will provide more transparency and certainty for developers at the planning application and development management stages of the planning process. However there will need to be clear linkages between the decisions the planning authority makes about land use allocations and the transport appraisal findings including consideration of sustainable modes.

It would also be useful if the guidance reflected the process in the SDP areas where a two-tier system remains in place.

Q.3 Will the draft guidance assist the process of developing strategic and local development plans?

A.3

The general response was that the guidance would assist as it sets out a step by step, stage by stage, approach which aligns the transport appraisal and the planning process. Assuming resources are available the process can assist by providing guidance on what should be undertaken when, though it would

be useful to provide details of who is responsible for undertaking tasks.

It would also be useful to take on board the outcomes of the first round of SDPs and make it clear that a pragmatic and approach is required that requires partnership. However it was also noted that transport appraisal should not be allowed to hold up the development plan process and further confirmation on the role of Transport Scotland could be included.

Q.4 How clearly does the draft guidance set out clearly the extent to which transport and land use modelling should be used in the appraisal?

A.4 Generally the guidance is clear on the extent to which transport modelling could be used without being overly complicated. However it is less clear on the detailed application of models and there could be more emphasis on need for technical assessment and use of modelling tools to assist with / supplement this analysis.

However it was recognised that the level of technical detail in this guidance document should be kept to a minimum and that clarity of the process is the key requirement of this guidance.

Q.5 Are the levels of appraisal set out in Table 1 clear and understandable?

A.5 Generally these were clear and understandable however there were a few comments regarding the feasibility of what is presented and these are referred to below.

Q.6 How appropriate do you consider the three levels of appraisal?

A.6 It was noted that all LDP appraisal lies at Level 2 while SDP appraisal are at Levels 1 or 3. Clarification required as to whether Levels 1 or 3 ever be appropriate within LDPs and Level 2 within SDPs. If there are appraisals that are specific to each type of Plan it would be useful to clarify this at the outset.

Within SDPs the question was raised as to whether preliminary design is likely to be achievable at the SDP level given the strategic nature of the Plan may not contain specific development locations. Concerns were raised as to the cost to the public sector in undertaking such work, particularly where it may still be appropriate for developers to undertake or make financial contributions to appraisal.

Further consideration could be given as to whether new junctions on parts of the

network where there are currently no capacity issues should be classed as Level 1. Where a step change in improvements to existing junctions it may be more appropriate for these to be addressed at the SDP stage.

Clarification on the role of Transport Scotland is required. The role of Transport Scotland in carrying out appraisal is not clear, for example it is not clear whether Transport Scotland modify their investment plans and constraints beyond that published to link to the emerging development plans.

Repeatable examples of appropriate appraisal would assist in demonstrating what is required. It was also noted that the environmental requirements of the Guidance overlaps with the SEA process.

Q.7 Is Figure 1 clear and understandable, and to what extent do you think it captures the principles and processes set out in the draft guidance?

A.7 Generally the table is well presented and provides a good summary of the process.

Cumulative impact assessment appears to be wide ranging and overlaps with other parts of the guidance. Reconsidering transport options based on consultation responses is only referred to a limited number of times within the document. It would be useful to clarify the use of LATIS. It was suggested that rather than referring to 'transport options' this could refer to 'spatial strategy options' in the SDP context thereby recognising that 'transport options' do not sit in isolation rather form one of many factors that are considered in assessing the spatial strategy of options.

Q.8 To what extent do you consider the timescales for delivery of strategic and local development plans allow for the level of appraisal recommended in the draft guidance?

A.8 *Given that Development Plans have to be reviewed every 5 years with monitoring reports provided at least every 2/3 years and action programme every 2 years, it may be difficult getting all the analysis completed before issue of the proposed plan or finalised plan.*

Q.9 Is there anything further you would like to see in the draft guidance which would either simplify or further explain the principles of transport appraisal in the development planning or development management context?

A.9 As A.1



Summary of key comments from advance Peer Review of DPMTAG (November 2009)	Transport Scotland's response to key comments (including any action taken, where appropriate)
The length of the report does not assist in the clarity and level of detail provided and while some sections could be simplified the use of more bullet points, tables and process maps would be welcome.	The recent amendments to the guidance document should assist in improving clarity overall.
Distinction in guidance between development management (transport assessment) and development plan (transport appraisal) could be more explicit.	Reference has now been made in the guidance document to the guidance on Transport Assessment provided in the "Guide to Transport Assessment for Development Proposals in Scotland". Also, recent amendments have been made to the guidance document to provide greater clarity on Transport Appraisal and associated timescales.
The emphasis is on what Planning Authorities should do. There is little information to guide what the Scottish Government will do with regard to national projects. This is important at the SDP level where Transport Scotland has and will be asked to provide information on national projects, for example those proposed in STPR.	The recent amendments made to the guidance document provide greater clarity on the Transport Scotland's engagement in plan preparation. Also, paragraph 20 has been updated to give clarity on proposed additional transport interventions related to the Strategic Transport Network.
The guidance will help to ensure that transport implications are identified early in the planning process and highlights the benefits of this early engagement as well as highlighting the implications of land use changes on the transport network. However there are issues surrounding the assumption that resources are available within Local Authorities to undertake this work.	The recent amendments which have been made to the guidance document which provide improved clarity on Transport Appraisal should contribute to keeping Transport Appraisal work proportionate, keeping the associated timescales and resources to a minimum. Ongoing engagement with Transport Scotland, in line with the guidance document, should assist in facilitating proportionate Transport Appraisals.
It is hoped that this will provide more transparency and certainty for developers at the planning application and development management stages of the planning process. However there will need to be clear linkages between the decisions the planning authority makes about land use allocations and the transport appraisal findings including consideration of sustainable modes.	It is anticipated that this should be achieved through following the guidance document.
It would also be useful if the guidance reflected the process in the SDP areas where a two-tier system remains in place.	Recent amendments made to the guidance document should improve clarity on the levels of appraisal at each stage. There are now specific sections covering appraisal of

<p>Summary of key comments from advance Peer Review of DPMTAG (November 2009)</p>	<p>Transport Scotland's response to key comments (including any action taken, where appropriate)</p>
	<p>strategic development plans; appraisal of local development plans; and appraisal of local development plans outside of strategic development plan areas.</p>
<p>The general response was that the guidance would assist as it sets out a step by step, stage by stage, approach which aligns the transport appraisal and the planning process. Assuming resources are available the process can assist by providing guidance on what should be undertaken when, though it would be useful to provide details of who is responsible for undertaking tasks.</p>	<p>Recent amendments made to the guidance document improve clarity on responsibilities at each stage.</p>
<p>It would also be useful to take on board the outcomes of the first round of SDPs and make it clear that a pragmatic and approach is required that requires partnership. However it was also noted that transport appraisal should not be allowed to hold up the development plan process and further confirmation on the role of Transport Scotland could be included.</p>	<p>There is the possibility of future amendments to the guidance, based on outcomes of the initial SDPs and LDPs.</p> <p>The recent amendments made to the guidance document overall, provide emphasis the benefit to partnership working and move the guidance away from previous references in the guidance to "Transport Scotland's requirements".</p> <p>Recent amendments also include greater clarity on Transport Scotland's engagement in plan preparation and the levels of support which Transport Scotland can give.</p>
<p>Generally the guidance is clear on the extent to which transport modelling could be used without being overly complicated. However it is less clear on the detailed application of models and there could be more emphasis on need for technical assessment and use of modelling tools to assist with / supplement this analysis.</p> <p>However it was recognised that the level of technical detail in this guidance document should be kept to a minimum and that clarity of the process is the key requirement of this guidance.</p>	<p>Recent amendments made to the guidance refer to modelling tools, including LATIS.</p>
<p>Generally the levels of appraisal) were clear an understandable, however, there were a few comments regarding the feasibility of what is presented and these are referred to below:</p>	<p>See comments below.</p>
<p>It was noted that all LDP appraisal lies at Level 2 while SDP appraisal are at Levels 1 or 3. Clarification required as to whether Levels 1 or 3 ever be appropriate within LDPs and Level 2</p>	<p>As stated above, recent amendments made to the guidance document should improve clarity on the levels of appraisal at each stage. There are now specific sections covering</p>

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<p>within SDPs. If there are appraisals that are specific to each type of Plan it would be useful to clarify this at the outset.</p>	<p>appraisal of strategic development plans; appraisal of local development plans; and appraisal of local development plans outside of strategic development plan areas.</p>
<p>Within SDPs the question was raised as to whether preliminary design is likely to be achievable at the SDP level given the strategic nature of the Plan may not contain specific development locations. Concerns were raised as to the cost to the public sector in undertaking such work, particularly where it may still be appropriate for developers to undertake or make financial contributions to appraisal.</p>	<p>Paragraph 60 of the recently updated guidance document advises that "it may be appropriate for developers to undertake elements of the appraisal, particularly where there is a direct relationship between the land use and transport solution(s)".</p>
<p>Further consideration could be given as to whether new junctions on parts of the network where there are currently no capacity issues should be classed as Level 1. Where a step change in improvements to existing junctions it may be more appropriate for these to be addressed at the SDP stage.</p>	<p>As stated above, recent amendments made to the guidance document should improve clarity on the levels of appraisal at each stage.</p>
<p>Clarification on the role of Transport Scotland is required. The role of Transport Scotland in carrying out appraisal is not clear, for example it is not clear whether Transport Scotland modify their investment plans and constraints beyond that published to link to the emerging development plans.</p>	<p>Recent amendments made to the guidance document include greater clarity on Transport Scotland's engagement in plan preparation and the levels of support which Transport Scotland can give.</p>
<p>Repeatable examples of appropriate appraisal would assist in demonstrating what is required. It was also noted that the environmental requirements of the Guidance overlaps with the SEA process.</p>	<p>Through engagement with Planning Authorities, Transport Scotland are able to offer advice on appraisal and modeling tools, which will facilitate the sharing of best practice and lessons learned through experience and contribute to keeping appraisals proportionate and associated resources and timescales to a minimum.</p> <p>It is understandable that there may be an overall with elements of both the guidance and the SEA process. It is recommended related work elements should be carefully managed to avoid unnecessary duplication at a later date.</p>
<p>The definition for Strategic Transport Networks cover those transport networks for which Transport Scotland is responsible for. Local or regional transport networks don't appear to be covered by the guidance.</p>	<p>Paragraph 5 of the guidance has been updated as follows:</p> <p>"This guidance focuses on Transport Appraisal of new developments in the context of Strategic Transport Network. It may also be used to assist Planning Authorities in assessing the impact of proposed development on the local transport network and identify the nature and location of local</p>

Summary of key comments from advance Peer Review of DPMTAG (November 2009)	Transport Scotland's response to key comments (including any action taken, where appropriate)
	transport interventions."