



# Reducing the need to travel

## A new planning objective in the UK?

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**New policy guidance from the UK government (PPG13) promotes the integration of land use and transport planning at the local level in order to reduce the need to travel and reliance on the private car. This paper explores the background to this policy in terms of historical and contemporary debates about transport, planning and the environment, and discusses its prospects in relation to shifts in the ideology of non-intervention visible since the end of the 1980s. It concludes that successful implementation will require wider policy aims, re-regulation of public transport, and better strategic and regional planning.**

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In March 1994 the UK government issued a policy guidance document for local authorities setting out the policy aim of reducing the need to travel. This marked a major change not only in planning and transport policy, but also in the perceived role of land use planning in achieving more sustainable patterns of development.

*Planning Policy Guidance Note Number 13, Transport*,<sup>1</sup> or PPG13 for short, has emerged at a time of growing debate in the UK about environmental issues, and in particular the adverse impact of car traffic on air quality and carbon dioxide emissions. Neither the title nor the utilitarian appearance of the document would seem likely to attract a wide audience, yet PPG13 has stirred up a vigorous debate about the role of planning in achieving more sustainable transport, and has attracted both cynical derision and loud applause.

In view of the high profile which PPG13 has earned, and the wider environmental agenda of which it forms a part, it seems timely to review where it has come from, the shape of the current debate about its contents, and the prospects for its implementation.

After a brief review of the rapid growth of car travel in the UK, the paper describes the scope and purpose of PPG13, and examines to what extent it represents a new policy direction. One of the key features of PPG13 is the promotion of integrated land use and transport planning. To what extent is PPG13 a return to early ideas of integrated planning, or is it a step towards a new style of planned intervention?

The paper then attempts to show how a Conservative government with a non-interventionist stance came to adopt a policy which is not only radical in its aims, but will require strong intervention in the long term for these aims to be achieved.

The main part of the paper is devoted to the prospects for achieving the aims of PPG13. It examines more closely the arguments for and against the new policy, and in particular whether these are concerned

<sup>1</sup>Department of the Environment and Department of Transport *Planning Policy Guidance: Transport PPG 13* (revised) HMSO, London (March 1994). All quotations are from this document unless stated otherwise.

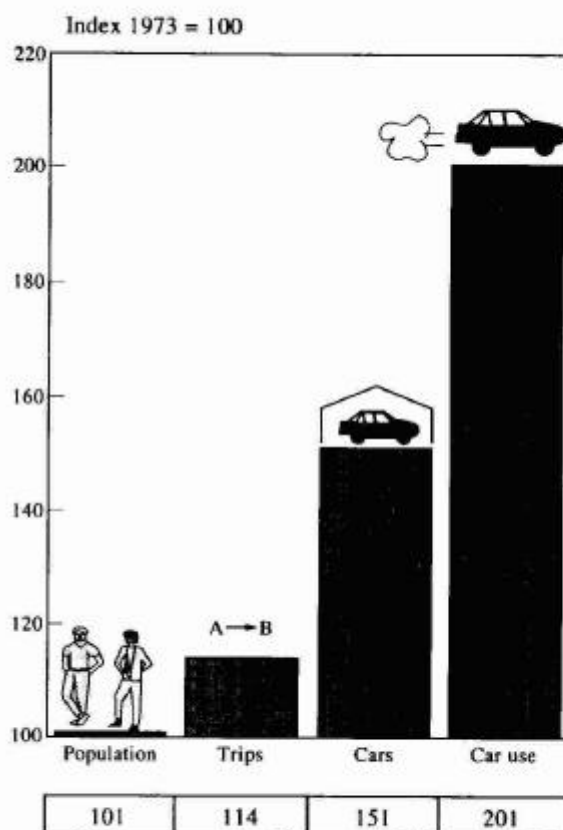


Figure 1. The mobility explosion.

with the objective itself of reducing travel demand, the appropriateness of the policies advocated, or the machinery for implementation. In other words, are differences of opinion about political, technical or organizational feasibility?

### The mobility explosion

The problem that PPG13 seeks to address is the adverse environmental impact of steadily increasing car use. As Figure 1 shows, while both the population and the number of trips that people make have remained relatively stable in the UK for 20 years, the number of car kilometres travelled has doubled.

This increase is associated with a switch of mode from cycle and public transport to the car, and an increase in the length of trips made by car. Between 1975 and 1993 the number of car journeys per person increased by 46%, while the average length of those journeys increased by 8%. Over the same period journeys by public transport fell by 27%.<sup>2</sup> By 1990 it was recognized that unless countermeasures were taken car traffic would continue to grow, and a further doubling of car kilometres would be likely by the year 2025. Thus problems that are already causing concern – including air and noise pollution, emission of carbon dioxide, loss of countryside and natural areas to roads and parking, declining transport choice, and erosion of urban quality by parked and moving vehicles – are all set to get even worse.

Moreover, traffic increase threatens to counteract any potential for air quality improvement due to advances in the fuel efficiency of vehicles, or to inducements for people to choose less polluting vehicles.<sup>3</sup>

<sup>2</sup>Department of Transport *Transport Statistics Report, National Travel Survey 1991/3* HMSO, London (1994), Table 2.3

<sup>3</sup>Holman, C *Transport and Climate Change: Cutting Carbon Dioxide Emissions from Cars* Friends of the Earth, London (1991); and Royal Commission on Environmental Pollution *Eighteenth Report: Transport and the Environment* Cm 2674, HMSO, London (1994)

## What is PPG13?

Responsibility for land use planning in the UK rests with local authorities, though the Secretary of State for the Environment has extensive power to intervene in local decisions, either by calling in a development proposal for central determination, or (more frequently) by adjudicating on appeals by developers against a local authority decision. Central government also has a major influence over local authority planning activity through the issue of what are known as Planning Policy Guidance Notes, or PPGs. Although the policies contained in these documents are advisory rather than mandatory, local authorities are expected to take them into account when preparing their Development Plans or when taking decisions on individual planning applications. Failure to do so may mean that the local authority's position is not upheld following an appeal.

The importance of PPGs has been increased by the advent of two recent Acts of Parliament<sup>4</sup> which have created what is commonly referred to as 'the plan-led planning system'. This apparent tautology is explained by the change from a presumption in favour of development (where decisions *might* be based on Development Plans) to a presumption in favour of Development Plan policy (where decisions *must* be consistent with the Development Plan unless there are powerful reasons why not). The greater importance given to Development Plans means also that government advice on policies to be included within them has greater moment, and the more recent PPGs indeed have a much stronger policy content.

The new PPG13 on transport (issued in March 1994) is the most powerful to date, not only because its policy covers all land uses as well as local transport, but also because it has the backing of both the Department of Transport (DOT) and the Department of the Environment (DOE). Its predecessor (*Highway Considerations in Development Control*, November 1988) dealt only with detailed and technical matters and was virtually devoid of policy content. The new PPG13 therefore appears to signal government acceptance of the need to 'integrate transport and land use planning' in the pursuit of three key policy aims:

- reduce growth in the length and number of motorized journeys;
- encourage alternative means of travel which have less environmental impact; and hence
- reduce reliance on the private car.

This policy guidance is directed at the contribution local authorities can make to the government's strategy for sustainable development, published three months earlier,<sup>5</sup> which referred to reducing the need to travel, influencing the growth of traffic and reducing the overall environmental impact of transport.

The new policies are justified in PPG13 by reference to the continuing trend of growth in motorized traffic and the threat this poses for reducing greenhouse gas emissions, improving air quality and protecting landscape and habitats. It is also argued that the policies will contribute 'to the goal of improving urban quality and vitality, and to achieving a healthy rural economy and viable rural communities'. The mechanisms for implementing the policies are regional planning guidance, Development Plans prepared by local authorities, and decisions on individual development proposals (development control).

Policy guidance is issued on various topics, and others with direct

<sup>4</sup>*Town and Country Planning Act, 1990 and Planning and Compensation Act, 1991* HMSO, London

<sup>5</sup>Department of the Environment *Sustainable Development: The UK Strategy Cm 2426*, HMSO, London (1994)

**Figure 2.** An out-of-town retail development.

Large out-of-town retail developments generate huge volumes of traffic and take both customers and investment away from town centres. PPG13 should halt such developments. This example cost £350 million to build and 95% of customers come by car.



relevance to PPG13 policies include those for commercial development (PPG4), town centres and retailing (PPG6) and the countryside (PPG7). The retailing policies in PPG6 are of particular importance since they represent the first major attempt to moderate the growth of out-of-town shopping developments and to encourage the revitalization of traditional town centres. Conflicts between PPG6 and PPG13, for example over the provision of parking in town centres, produced the need for a further revision of PPG6 after less than two years.<sup>6</sup>

The core of PPG13 lies in the policy advice contained in sections dealing with, first, the location of new developments (housing, employment, retail, leisure, etc), second, complementary transport measures (car parking, park and ride, pedestrians, cyclists, traffic management and public transport), and third, the provision of transport infrastructure (roads, railways, airports, etc). Further sections deal with more mundane matters, such as how new developments connect with the road network.

It is not possible within the scope of this paper to outline all the policy recommendations contained in PPG13, but a selection will convey the general thrust, and the fairly radical nature of the document:

- location policies to concentrate new development in places accessible by a range of transport modes, not just the car;
- employment and other travel-generating activities at locations highly accessible by public transport;
- higher densities in places well served by public transport;
- low-density and car-based developments on peripheral sites to be discouraged, especially out-of-town shopping developments and small free-standing new settlements in the countryside;
- development preferred which reuses 'brownfield' sites within existing urban areas.

As well as location policies for new developments, complementary transport measures are advocated which increase the attractiveness of modes of travel other than the car, and boost the competitiveness of urban centres against peripheral development. This is expressed as promoting choice in travel, and thus reducing dependence on the car. The policy advice is mainly to improve conditions for public transport

<sup>6</sup>Reported in *Planning Week* 2 March 1995



**Figure 3.** Vacant high street shops.

Local authorities are hoping PPG13 will help them to reverse the decline of High Street shopping.

and the non-motorized modes. More direct restraint of car use, however, is implied by policies to reduce or limit the provision of car parking in new developments, for example by:

- keeping parking provision to the 'operational minimum';
- reducing provision in areas well served by public transport; and
- ensuring that parking levels at peripheral locations are not so high as to 'significantly disadvantage more central areas'.

After years of trying to provide sufficient off-street space to satisfy all parking demand, local authorities may find this latter policy the most radical and difficult to accept.

The provision of transport infrastructure is said to be 'subject to planning procedures', and transport proposals should support the locational objectives of Development Plans, lead to improvements in the environment and reduce road accidents. It is notable that providing



**Figure 4.** A business park.

Large single-use employment sites with saturation parking are contrary to PPG13 policy. In this business park only 10% of employees travel to work by public transport.



**Figure 5.** New offices and station near St Paul's, London.

In central London, new offices have minimal parking and 85% of employees travel by public transport. No other British cities can yet claim such pro-PPG13 policies.

for further traffic growth is not included as a policy objective, though the government's own programme for expanding trunk road capacity, which is still largely driven by this objective, is specifically excluded from local planning debates.

### **A policy without precedent?**

What, then, is new about PPG13? Are there any precedents in UK planning for the integration of land use and transport which it advocates, or indeed for the central policy aim of reducing the need to travel?

Theories of minimizing travel distance and dependence on motorized travel pre-dated mass car ownership, and were developed by the planners of New Towns in the post-war period. Examples include the grouping of local facilities in residential neighbourhoods so that people could reach them easily on foot (eg Harlow and Stevenage), and the structuring of homes and shopping centres around a segregated busway in Runcorn. Such integration was relatively easy, however, for such greenfield development sites, and with the comprehensive powers of Development Corporations to plan both transport and land use within their designated areas.

Existing cities could not so easily be restructured or planned, but the onslaught of the car, so dramatically highlighted in the Buchanan Report of 1963,<sup>7</sup> led to the importation from North America of major land use-transportation studies to help provide for increased traffic. Although these were called integrated studies, in practice most were designed simply to support plans for major road building.

Towards the end of the 1960s major institutional changes were set in train, driven by the government's desire to strengthen the strategic dimension of planning. These changes included:

- the introduction of structure plans (1968);
- new local authority responsibilities for public transport (1968), including the creation of Passenger Transport Authorities to plan metropolitan area services;
- combination of planning and transport functions in a new joint ministry (1970);

<sup>7</sup>Ministry of Transport *Traffic in Towns* Reports of the Steering Group and Working Group (the 'Buchanan Report'), HMSO, London (1963)

- integrated bids for local transport grants (Transport Policies and Programmes, 1974);
- the creation of strategic authorities for the big cities (Greater London Council, 1965, and Metropolitan Counties, 1974).

From a planning policy viewpoint, however, these moves were driven more by aspirations to adapt the city to the car than by any deliberate intention to limit car use. Traffic restraint was accepted as inevitable for peak hour journeys to city centres, but elsewhere the assumption that provision for the car should take top priority went mostly unchallenged.

The policy rhetoric did begin to change, however, and a premonition of PPG13 appeared in the Transport Policy White Paper of 1977: 'For the future . . . we should aim to decrease our absolute dependence on transport and the length and number of some of our journeys.'<sup>8</sup> But the policy instruments to pursue a change of direction were not developed, and a commentator at the time said that the 1977 White Paper was 'remarkable for leaving things as they are, while making modern noises'.<sup>9</sup>

In summary, we can see that neither the rhetoric nor the planning principles of PPG13 are entirely new, while the call for integrated land use and transport planning will have a hollow ring, except perhaps to those with no experience of the pre-Thatcher years. Nevertheless, the explicit statement of aims in PPG13, with comprehensive policy instruments to bring them about, is unprecedented, and with the backing of both key government departments represents an important change in the policy process.

### Where did PPG13 come from?

The predominant ideology of the Conservative governments in the UK since 1979 has been to reduce state intervention and to encourage the free market economy, and the markets in land and development have been no exception. This led during the 1980s to what Brindley *et al* described as 'the fragmentation of planning'. They showed how 'new and old approaches to planning vie with one another . . . as one dominant ideology attempts to replace another'.<sup>10</sup>

The Thatcher government instituted many changes which contributed to what is usually referred to as the deregulation of the land and property market, for example:

- abolition of the London and other big city governments;
- restrictions on local government revenue and expenditure;
- exclusion of local authorities from certain urban regeneration initiatives (Enterprise Zones, Urban Development Corporations, etc);
- opening to private sector speculation of land formerly under public control (eg health, education, railways and ports);
- reduced categories of development requiring planning permission;
- reduced importance of Development Plans, brought about by the DOE through Structure Plan modifications, planning appeal decisions, and calling in planning applications.

<sup>8</sup>Department of Transport *Transport Policy* Cmnd 6836, HMSO, London (1977) 7

<sup>9</sup>Bugler, J *The Observer* 12 July 1977

<sup>10</sup>Brindley, T, Rydin, Y and Stoker, G *Making Planning: The Politics of Urban Change in the Thatcher Years* Unwin Hyman, London (1989) 7

In the mid-1980s public transport was also wrested from local authority control with the deregulation of local bus services.

These and other changes meant a dramatic shift of power to a central administration with an ideological aversion to intervention. The idea of controlling the type and location of development in order to help meet

broad environmental objectives seemed, until the early 1990s, to be well outside the range of the possible.

What forces, then, were at work to bring about the new breed of interventionist PPGs? It is not easy to be sure about the answer to this question, not least because governments are rarely willing, even if they were able, to make explicit the reasons for a change of direction. Nevertheless, it is possible to identify a number of separate debates which at the end of the 1980s tended to converge and to strengthen the case for government action to curb the growth of car traffic.

First, growing public awareness of environmental issues was reflected in a rapidly increasing flow of studies and reports on air pollution, emissions of carbon dioxide and other greenhouse gases, road accidents, and the declining fortunes of traditional urban and suburban centres. Many reports and conferences pointed to growing use of and dependence on the car as the principal cause of these problems.<sup>11</sup> These concerns were not confined to the UK, of course, and the recognition of global environmental problems and of international action to tackle them had the effect of widening the policy horizons.

Second, serious doubts were being raised about the link between economic growth, traffic growth and the need for more road capacity.<sup>12</sup>

Third, the deregulation of the land and development market meant that developers were having to submit numerous planning applications simply to stay ahead of the competition. Commercial and industrial interests were coming to the view that weak local planning could lead to inefficiencies and lower financial returns in the property market, quite contrary to the government's intentions.<sup>13</sup>

Fourth, the DOT's defence of its road building programme (estimated in 1990 to cost £18 billion) was weakened not only by the growing strength and organization of anti-road protest groups, but also by changes in the structure of the civil service which meant that the rump of professionals concerned solely with road building were split off into separate highways agencies. *De facto*, there was a better balance within the DOT between road and other interests, and a better chance to consider policy issues which before had been swamped by the road planning function. This probably made it easier to achieve the necessary collaboration over PPG13.

Fifth, but most significant of all in stimulating the overall debate, the National Road Traffic Forecasts produced by the DOT in 1989 showed that, without a change of policy, road traffic was likely to grow by between 83% and 142% from 1988 to the year 2025. It quickly became clear that even the government's large-scale road-building programme could not keep pace with such growth, and that congestion and environmental problems would worsen over the coming decades. Ministers were quick to point out that the growth figures were not targets, but extrapolations of trends, but this made it no easier to justify their adherence to policies which had brought about such undesirable trends. A further outcome was the commissioning of further reports, including one entitled *Reducing Transport Emissions Through Planning*<sup>14</sup> which was a direct precursor of PPG13.

The realization that the forecast growth in traffic could not be accommodated led inexorably, though often reluctantly, to the conclusion that demand would have to be 'managed' or 'influenced'. This change of attitude was neatly encapsulated by Goodwin in the phrase 'the new realism'.<sup>15</sup>

<sup>11</sup>For example: Department of the Environment *This Common Inheritance: Britain's Environmental Strategy* Cm 1200, HMSO, London (1990); Association of County Councils *Towards a Sustainable Transport Policy*, Association of County Councils, London (1991); Greenpeace *The Environmental Impact of the Car*, Greenpeace International, Amsterdam (1991); Public Health Alliance *Health on the Move: Policies for Health Promoting Transport*, The Public Health Alliance, Birmingham, UK (1991); Countryside Commission *Trends in Transport and the Countryside*, Countryside Commission, Cheltenham, UK (1992)

<sup>12</sup>Standing Advisory Committee on Trunk Road Assessment *Urban Road Appraisal* Department of Transport, London (1986); see also Pharoah, T *Less Traffic, Better Towns* Friends of the Earth, London (1992)

<sup>13</sup>See for example Rydin, Y *Housing Land Policy* Gower, Aldershot, UK (1986)

<sup>14</sup>Ecotec Research and Consulting, for Department of the Environment and Department of Transport *Reducing Transport Emissions Through Planning* HMSO, London (1993)

<sup>15</sup>Goodwin, P, Hallet, S, Kenny, F and Stokes, G *Transport: The New Realism* Transport Studies Unit, University of Oxford, UK (1991)



## How important is PPG13?

Some indication has already been given of the importance of PPG13 in terms of the UK policy machine and its response to the new environmental agenda. But the document itself must be judged by the impact it has on transport and development decisions, and ultimately on the outcomes in terms of travel patterns. Such outcomes cannot easily be measured in the short term, and in the long term it will be difficult to say what might have happened without PPG13, because other policies affecting transport demand (such as fuel tax increases) are also changing. On the other hand, any failure to prevent new car-based developments will be relatively conspicuous.

PPG13 has been welcomed by many as a watershed document, marking a new era of plan-led decision making to serve environmental objectives, and of integrated land use and transport planning. On the other hand questions have been raised, especially by practitioners in local government, about whether PPG13 policies can be implemented, whether they will be effective in reducing travel, and whether they are sufficient by themselves to reverse the powerful trend towards greater car dependence. Phrases such as 'too little too late' and 'shutting the stable door after the horse has bolted' have appeared in the planning press.<sup>16</sup>

To assess the grounds for pessimism or optimism, we can examine PPG13 in relation to four general criteria for a successful policy.

### *Is the policy itself well-founded?*

The general theory behind location planning to avoid the need to travel is fairly well established, and PPG13 covers the expected topics of higher densities, mixed land uses, strong centres, compact urban areas and so on. The DOE recognizes, however, that better understanding is needed on some aspects, and has commissioned further research to help local authorities when faced with complex or ambiguous development situations.<sup>17</sup>

For example, one of the UK's large supermarket chains claims that building more supermarkets will reduce car travel because people will have to drive less far to reach one.<sup>18</sup> This claim is, however, based on the assumption that all food shopping will be, or should be, undertaken by car. It also takes no account of supermarket size, which would need to be reduced for the claim to hold good. Despite these claims and counter-claims, to date no definitive and independent research has been undertaken, which leaves local authorities exposed when trying to defend decisions to refuse supermarket applications on travel grounds.

Another example concerns the importance of parking provision in boosting the competitiveness of town centres. Town centre traders usually argue that they cannot compete with out-of-town shopping unless cheap and ample parking is provided. On the other hand, if such provision led to the destruction of the environmental attractiveness of the centre, this too would reduce their competitive position. A major study of 38 German cities found that retail trade had performed best in city centres with below average provision for the car.<sup>19</sup> From the point of view of traffic reduction, there is unlikely to be any gain at all in trying within older urban centres to replicate the convenience for car users of out-of-town locations. This issue has led to a perceived conflict between PPG6, which advocates development in older centres, and PPG13, which advocates less parking in such centres. While the

<sup>15</sup>Goodwin, P, Hallet, S, Kenny, F and Stokes, G *Transport: The New Realism* Transport Studies Unit, University of Oxford, UK (1991)

<sup>16</sup>PPG13 meets with cautious welcome' *Planning Week* 24 March 1994

<sup>17</sup>The DOE has commissioned a 'guide to better practice' to accompany PPG13.

<sup>18</sup>Telephone Surveys for J Sainsbury plc, in *Food Shopping and the Car: Findings from a Survey of Car Users* J Sainsbury, London (1993)

<sup>19</sup>Apel, D and Lehmbruck, M *Stadtverträgliche Verkehrsplanung* Deutsches Institut für Urbanistik, Berlin (1990). These results are summarized in Pharoah *op cit* Ref 12.

government has promised to further revise the town centre guidance (PPG6), there is little UK research to inform the debate.

Sometimes policies are applied without thorough understanding of their consequences. An example is park-and-ride systems. These have been implemented in many cities to reduce car travel to city centres, and thus to ease congestion on the radial roads. When, as suggested by PPG13, the objective is not to reduce congestion but to reduce car dependence or car use, park-and-ride policies need to be re-examined and perhaps redesigned, because schemes can result in more car kilometres being driven, not less.<sup>20</sup>

#### *Is it sufficient?*

It is recognized within PPG13 that land use planning by itself can only make it *possible* for people to rely less on the car; it does not ensure that people *will* choose to use their cars less. That will depend on the quality of the alternatives, public transport fares, motoring taxes and other factors. Consequently the land use policies advocated in PPG13 are seen as necessary but not sufficient to bring about a reduction of car travel. This is addressed to some extent by the inclusion of local transport policies in the planning process, and other aspects of the government's strategy for sustainable development, notably the commitment to raising fuel tax by 5% per year in real terms, and the possible introduction of direct charges for road use (motorway tolling and urban road pricing).

An important criterion on which PPG13 must be judged is the appropriateness of the objectives that lie behind it. Examination of the text reveals that the government does not intend to *reduce* car traffic. The stated objective is to '*reduce the growth*' of traffic (present author's emphasis), thereby accepting that traffic will continue to grow. Since the intention is not to bring about any overall improvement, but only to slow down the rate at which conditions deteriorate, local commitment to the policy could be difficult to sustain. Of course, technological improvements have the potential to reduce pollution from motor vehicles, but they cannot eradicate other unwanted effects of motor vehicles.

There is a further issue concerning the objective of reduced traffic growth. In the absence of any targets for absolute traffic levels, measurement of any reduction in traffic growth depends entirely upon the accuracy of the forecast level of traffic that would have resulted if policy had remained unchanged. In political terms, therefore, high forecast rates of traffic growth are desirable because any outcomes below the forecast level can be claimed as a policy success. Empirically, however, the outcome says no more about the effectiveness of the policy than it does about the quality of the forecast.

#### *Can it be implemented?*

The policy content of PPG13 is aimed at the role local authorities can play in reducing the need to travel. It is therefore important that local authorities themselves regard the policy as both appropriate and feasible. Reports in professional journals suggest that, while the general aims are widely applauded, implementation is judged to lie somewhere between difficult and impossible. This scepticism appears to arise from four principal sources (apart from the technical uncertainties already referred to), namely:

- limited local authority control over public transport;

<sup>20</sup>Report on study by Parkhurst, G, Transport Studies Unit, University of Oxford, in *Local Transport Today* 15 September 1994

- an absence of strong regional policy;
- national policies which are perceived as fuelling traffic growth and hence making its reduction at the local level harder to achieve; and
- pressures for property development which run counter to the ideals set out in PPG13.

We consider each of these briefly in turn.

*Limited local authority control over public transport.* Following the Transport Act of 1985, local bus services in the UK, with the sole exception of London, were effectively removed from local authority regulation and control. It is no longer easy to plan new developments in relation to public transport since neither the routes operated by private companies, nor the fares or level of service, can be guaranteed for more than a few weeks ahead. There are powers to subsidize services to meet specific social needs, but it is not possible to plan for a desired network and quality of service, or for a specific market share. Local authorities can influence aspects of public transport operation in their areas (eg through tickets, low fares, passenger information, vehicle design and quality) but only through negotiation with private bus operators who may or may not be interested in long-term planning. Following bus deregulation, the use of public transport has continued to fall, and in many parts of the country at a faster rate than would have been expected had deregulation not occurred.<sup>21</sup> Local authorities may build interchanges, bus shelters and other infrastructure, but there is no requirement of the private bus operators to cooperate in using such facilities, let alone contribute to their cost.

It is worth noting, however, that the entire debate about bus deregulation in the UK has been conducted with no more than passing reference to land use planning. The arrival of PPG13 may change this, and there are recent signs that the government may be prepared to reconsider its position, and that the Labour opposition is prepared to re-regulate local bus services.<sup>22</sup>

*Absence of strong regional planning policy.* The absence of strong regional planning policy is perceived by local authorities to inhibit the scope of PPG13. A frequently mentioned example concerns parking policy. The argument runs something like this: If we as a council refuse permission for a new development on the grounds that excessive parking provision is contrary to the aims of PPG13, the developer will simply take the proposal to another local authority which is less concerned about the transport issue, or where the aim is to attract new developments at any cost. The problem is most apparent in the UK's major cities, whose strategic authorities were abolished in 1986, but potentially exists wherever there is competition for development opportunities. Only in areas of very high land value and excellent public transport accessibility have restrictive parking policies been successfully applied, and in any case (as in central London) these policies pre-dated PPG13 by more than 20 years. A consistent and coherent parking restraint policy for entire regions is the only way to avoid many local authorities losing out in the competition for new employment and other facilities if they try unilaterally to implement PPG13 policy.

<sup>21</sup>Transport Studies Unit *Bus De-Regulation: The Metropolitan Experience* Association of Metropolitan Authorities, London (1990)

<sup>22</sup>*Local Transport Today* 16 March 1995

*Unsuitable national policies.* The national policy of expanding inter-

urban road capacity is also seen by local authorities as an obstacle to the implementation of PPG13 policies. More road capacity *between* urban areas will mean more car trips *within* them (since eight out of ten people live in urban areas), and will also increase the attraction of the car relative to the more environmentally friendly modes. Investment in the trunk road-building programme also means less money available for investment in urban transport. Central government could thus be accused of having double standards – urging local authorities to reduce traffic growth while pursuing a road policy which will inevitably increase traffic growth. After years of resistance, the DOT finally accepted in 1995 that major new roads generate new traffic.<sup>23</sup>

*Private sector pressure on local authorities.* Local authorities also express their concern that PPG13 policy will be difficult to apply because, while they have limited opportunity to promote development themselves, private sector aspirations in many respects run counter to the aims of PPG13. Dispersal of activities is partly fuelled by cheaper land on the periphery of cities, sometimes encouraged by public road investment in such areas. Developers also prefer large, single-use developments to small, mixed-activity developments as advocated in PPG13. For example, retail developers normally insist that there will be nothing other than retail activity within the site, and planning authority insistence on mixed-use sites will simply lead them to develop elsewhere. In housing, there is strong resistance to the idea of higher-density living, especially on 'brown-field sites' in inner-city areas, and house-builders claim that potential buyers prefer suburban to urban locations. Most important of all, not only do developers often insist on providing ample parking space to meet future as well as present demand, most local authorities still insist that they do so, partly because of the competitive pressures already referred to, but also to avoid congestion caused by kerbside parking.

In all of these ways, PPG13 policy is seen, with considerable justification, to be working against the grain of current development norms and pressures.

#### *Is PPG13 robust?*

Ultimately, reduced travel demand will be achieved only if PPG13 and other policies succeed in changing personal travel choices. Consequently, since the policy is working against established practice and behavioural trends, it will require political commitment to be maintained over a long period. This suggests that it must command cross-party support, and reflect a broad consensus among the public and development interests.

There are several ways in which the necessary consensus could fail. First, and perhaps most important, the benefits of PPG13 must be felt by those who are affected by it. Traders in town centres must benefit more than those in out-of-town locations, house-builders must secure more profit from inner-city projects than from greenfield developments, employers must benefit from public transport locations more than from car-dependent locations, and the public at large must be able to experience higher-quality urban lifestyles and 'travelstyles'. The problem here will be to deliver such benefits quickly enough to achieve the necessary support for PPG13 policy. The built urban fabric is estimated to be renewed at only 1–2% each year,<sup>24</sup> and transport infrastructure also changes only slowly. Consequently, even with fully effective

<sup>23</sup>Standing Advisory Committee on Trunk Road Assessment *Trunk Roads and the Generation of Traffic* (and Government response) HMSO, London (1995)

<sup>24</sup>Ecotec *op cit* Ref 14, x

implementation of PPG13, changes will be slow to materialize. This will be a real test of political commitment.

Second, the policy itself must be seen to be well founded. There is a danger that too much weight has been given to the objective of reducing carbon dioxide emissions. In 1995, for example, the UK government announced that it had got its figures on carbon dioxide emissions wrong, and that there would after all be no increase in such emissions by the end of the century. Thus the government's previously announced target following the 1992 Rio Summit of stabilizing carbon dioxide emissions by the year 2000 can apparently now be met without any policy intervention whatsoever. This illustrates the danger of building complex and difficult policies such as those in PPG13 upon objectives that are too narrow or poorly constructed.

Third, PPG13 demands consistent action across the broad spectrum of transport and development activity, in order to resolve powerful conflicts of interest and to deliver rather general communal benefits over a long period of time. It must be questioned whether the UK's weak and under-resourced local authorities are capable of such a complex and difficult task.

Fourth, having issued PPG13, the government must show itself to be fully committed to its aims, and to be prepared to adjust its own practice to provide a consistent framework for local authority decisions. There have already been signs of a willingness to act in this direction. The raising of fuel tax above the rate of price inflation, a stated commitment to introducing fiscal measures which make transport users more aware of the social costs of their travel decisions, and a scaling down of the trunk road-building programme are recent measures in line with PPG13. The funding of local transport is also now subject to more comprehensive planning rules than during the 1980s, notably the inclusion of proposals other than just roads in the annual Transport Policies and Programmes of local authorities when seeking government transport investment grants, and the DOT's acceptance of so-called 'package bids' involving integrated transport proposals from one or more local authorities. There are, nevertheless, other aspects of government policy which suggest a less than complete conversion to the aims of PPG13, for example, the exclusion of Wales from its remit, continued subsidy of company cars, and reduced scope for public transport planning brought about by bus deregulation and railway privatization.

### **The impact of PPG13 in practice**

It is too soon to make firm judgements about the impact of PPG13, but since the first draft appeared in 1993 there have been signs of change in local authority practice, in developers' strategies, and in government support for the new ideals.

First, there can be no doubt that PPG13 has stimulated intense and wide-ranging debate on development issues. Second, the number of retail planning applications called in by the Environment Secretary and the proportion of them that have been refused appears to have increased since PPG13.<sup>25</sup> Third, major food retailers have been giving more emphasis to developing smaller stores without car parking in town centres, examples being the Tesco 'Metro' stores and Sainsbury's 'Central' stores. Fourth, the planning world has witnessed a stream of conferences, research reports and local management and design initiatives to revitalize town centres.<sup>26</sup>

<sup>25</sup>Information from J Sainsbury plc, January 1995

<sup>26</sup>For example, *Urbed* for Department of the Environment *Vital and Viable Town Centres* HMSO, London (1994)

Fifth, on the transport front the DOT has encouraged integrated bids for local transport grants, and provided money for projects such as the London Bus Priority Network, and various cycle route schemes. The trunk road-building programme has also been slowed down, though it remains to be seen whether this is a product of public expenditure cutbacks or of a change of policy.

## **Conclusions**

UK land use planning has two important new objectives: reducing the need to travel, and reducing dependence on the car. These have emerged from converging debates about the environment, urban quality and transport, stimulated by forecasts of a dramatic further increase in road traffic.<sup>27</sup>

This paper has examined the debate which PPG13 itself has generated, and identified grounds for optimism about its potential such as shifting development trends and stronger government commitment to planned intervention in the land and property market. Optimism is also justified by growing recognition that allowing things to continue as before would have disastrous economic, social and environmental consequences. It is first necessary to stop developments which increase reliance on the car, though the task of promoting alternative developments which reduce car dependence is likely to prove more challenging.

Enthusiasm for the new policy has, however, been tempered by the fact that deregulation in both land and transport during the 1980s added to the momentum of increasing car dependence. From this perspective PPG13 has come very late, and will be unable, by itself, to reverse undesirable trends in development. It is therefore necessary to see PPG13 alongside other changes which affect travel and location choice, and we have noted both positive aspects such as rising fuel tax and negative aspects such as continued bus deregulation and large-scale interurban road building. PPG13 places a huge burden of responsibility on local planning authorities to deliver the intended results, but this could be alleviated by more consistent and supportive action at the national and regional level.

From a historical perspective we have seen that in earlier decades there were mechanisms for integrated transport and land use planning, but the policy commitment was lacking. It is therefore ironic that the radical policy commitment in PPG13 has come only after the mechanisms for integrated planning have largely been dismantled. There are signs of an ideological retreat from the deregulated planning of the Thatcher era, but it remains difficult for the Conservative government to reconcile recognition of the need for intervention with its commitment to free market philosophy. Meanwhile local authorities still have little opportunity to promote positive measures, in terms of either land development or local public transport. In controlling private sector development initiatives, resolving the crucial issue of inter-authority competition for development will be difficult without a stronger regional planning framework.

Finally, the objective of reducing the need to travel needs to be underpinned by more than just air pollution concerns. In the long run a wider vision of lifestyle choices, and in particular for the improvement of city as opposed to suburban or peri-urban living, will be seen to be more important in achieving the goal of sustainability.

<sup>27</sup>Department of Transport *National Road Traffic Forecasts (Great Britain) 1989* HMSO, London (1989)