

PROPORTIONATE AND PRAGMATIC DPMTAG – MYTH OR REALITY?

A CASE STUDY EXPLORING PRINCIPLES-LED TRANSPORT APPRAISAL FOR DEVELOPMENT PLANNING

**Paul Finch, BEng (Hons), MSc, TPP, CMILT
Principal Engineer (Transportation), Aberdeenshire Council**

**David Torrance, BEng CEng, MICE
Senior Transport Planner, Transport Scotland**

1. INTRODUCTION

This paper explains how Aberdeenshire Council, with the support of Transport Scotland, undertook a transport focussed appraisal of their emerging Local Development Plan (LDP). The approach adopted was characterised by a flexible and pragmatic interpretation of existing Development Planning and Management Transport Appraisal Guidance (DPMTAG) (*Transport Scotland, 2011*), and therefore offers wider interest for other authorities undertaking or considering such work.

The key learning points are that the process need not be prescriptive and burdensome, but by application of the key principles of the guidance, a tailored and proportionate approach can successfully executed. Benefits for Aberdeenshire Council included fuller engagement of planning colleagues with transport issues, fitting their appraisal timescale within development plan requirements, and justifying amendments to allocations that were problematic from transportation perspective.

Furthermore, the insights on good practice, pragmatic use and potential improvements for the existing guidance will be highlighted. These points have been drawn from the discussions throughout the process and relate largely to the proportionate and streamlined approach adopted to fit with the LDP timescales.

The paper explains the process and outcomes of the study from the perspective of the authors and therefore the reflections and wider learning point should not be read as the views or policies of either Aberdeenshire Council or Transport Scotland.

2. SCOTTISH PLANNING SYSTEM

The planning system in Scotland is plan led¹. Local Development Plans are required for each council area across Scotland. These allocate sites for either new development, such as housing, or sites to be protected, as well as establishing policies to guide decision on all

¹ Further details on the Planning System in Scotland can be found at <http://www.gov.scot/Topics/Built-Environment/planning>

planning applications. Strategic Development Plans are required for the four largest city regions, which deal with the scale of housing, and transport and water connections that are needed.

Scottish Planning Policy (SPP) (*Scottish Government, 2014*), updated in June 2014, sets out national planning policies which reflect priorities for the operation of the planning system, and development and use of land. In respect of the preparation of development plans, and with particular reference to the interaction of transport and land use planning, it states the following in paragraph 274...

“In preparing development plans, planning authorities are expected to appraise the impact of the spatial strategy and its reasonable alternatives on the transport network, in line with Transport Scotland’s DPMTAG guidance. This should include consideration of previously allocated sites, transport opportunities and constraints, current capacity and committed improvements to the transport network. Planning authorities should ensure that a transport appraisal is undertaken at a scale and level of detail proportionate to the nature of the issues and proposals being considered, including funding requirements. Appraisals should be carried out in time to inform the spatial strategy and the strategic environmental assessment. Where there are potential issues for the strategic transport network, the appraisal should be discussed with Transport Scotland at the earliest opportunity.”

In pointing to DPMTAG in relation to transport appraisals, SPP is looking for development plans to align with the general requirement for evidence-based and deliverable plans.

The DPMTAG guidance was published in 2011 following a fairly extensive consultation, drafting and peer review process as a guide to appraising potential transport interventions associated with developments which may have an impact on the strategic transport network. The DPMTAG guidance seeks to enable land use planners and developers to understand potential changes in travel as a result of changes in land use and align subsequent development planning and transport appraisal processes.

3. ABERDEENSHIRE COUNCIL AND TRANSPORT SCOTLAND

Aberdeenshire Council is the 4th largest local authority in Scotland by area, covering the largely rural hinterland of Aberdeen City in north east Scotland. With a population of 258,000 (2013 estimate) its principal settlements include Peterhead, Fraserburgh, Inverurie, and Stonehaven, extending from the coast to include parts of the Cairngorms National Park. Like other Scottish Local Authorities, Aberdeenshire Council is both the local planning and roads authority. It falls within the area covered by the Aberdeen City and Shire Strategic Development Plan, which provides the strategic context for the Local Development Plans of both Aberdeenshire Council and neighbouring Aberdeen City Council.

Transport Scotland is an Agency of the Scottish Government, accountable to Parliament and the public through Scottish Ministers. It supports and advises the Scottish Government on

strategy and policy options for transport in Scotland, and seek to contribute to increasing sustainable economic growth through the development of national transport projects. As a Key Agency in the planning process Transport Scotland is required to engage with relevant authorities in the development plan process and report annually through the Planning Performance Framework. The early transport appraisal/planning stages and interaction with planning authorities are supported by the Development Planning team within the Technical Analysis Branch of the Major Transport Infrastructure Projects directorate. This is distinct from but linked to the consideration given at planning application stage which is undertaken by the Development Management team within the Trunk Roads and Bus Operations directorate.

4. ABERDEENSHIRE'S LOCAL DEVELOPMENT PLAN

The currently approved LDP for Aberdeenshire Council was published in 2012 (*Aberdeenshire Council, 2012*)². In terms of transport appraisal, this plan was informed by individual assessments of bid sites, and cumulative impact assessments along each strategic corridor, including a pilot DPMTAG study related to alternative major allocations on the A90 south of Aberdeen.

The Aberdeenshire LDP is set in the context of the Aberdeen City and Shire Strategic Development Plan (SDP) (*Aberdeen City and Shire SDPA, 2014*), and benefited from the wider work undertaken to consider the strategic transport implications of development and related transport growth related to this plan. Because of this wider strategic appraisal and modelling work and the on-going and planned investment in major infrastructure (AWPR – Balmedie to Tipperary; Aberdeen-Inverurie Rail Improvements etc.) many of the issues being considered by the DMPTAG review for the LDP were focused on more local individual site or settlement related cumulative impacts at key junctions.

Work on the replacement 2016 LDP commenced in October 2013³ with the publication of the Main Issues Report (MIR) (*Aberdeenshire Council, 2013*). The MIR pointed largely towards only incremental change from the 2012 LDP; in many respects, at this point in time, the 2016 LDP was shaping up to be a “roll forward” of the current plan. At this point, no new transport focussed appraisal of alternative land use allocations had been undertaken for the 2016 LDP, other than review of previous and new bid submissions.

In summer 2014, and following approval of the SDP earlier in the year, the MIR consultation outcomes were reported to committee, laying the foundations for the development of the 2016 LDP Proposed Plan. At the same time the SPP refresh was published, emphasising the requirement for a DPMTAG assessment. This prompted the realisation that transport

² Copies of the current Local Development Plan, and associated supporting documents available from https://www.aberdeenshire.gov.uk/planning/plans_policies/index.asp

³ Full details of the development of the 2016 Local Development Plan are available from https://www.aberdeenshire.gov.uk/planning/plans_policies/next_ldp.asp

appraisal work would be required in order to minimise risk of challenges when the plan was presented for examination. The prevailing attitude within the Council at this point was that a DPMTAG appraisal would add little value, could be resource intensive, would largely represent a “tick box exercise”, and was a risk to development plan timescales. Overall, it needed to be completed quickly, efficiently, with any risks or unexpected outcomes to be controlled as much as possible.

This initial reaction reflects some of the experiences across other planning authorities and has led to the limited use of the guidance to date. The perceived implications for timescales and resources is a major concern and if this is coupled with a lack of perceived benefit or added value then the process is simply put to the side. What can be frustrating from a Transport Scotland perspective is that many council’s will or have undertaken much of the appraisal process in some form while sifting and considering sites for inclusion in their LDP but have often not structured or reported this information or used it to further inform the Proposed Plan and or Action Programme.

5. EXISTING GUIDANCE

For Aberdeenshire Council, the starting point for the DPMTAG appraisal was a review of the existing guidance. The guidance pointed towards undertaking transport appraisal at an early stage of the development plan process, where it can most effectively shape the spatial strategy. It specifically highlighted the value of engagement with Transport Scotland during the appraisal process, and also that it sought to reflect the principles of best practice contained within Scottish Transport Appraisal Guidance (STAG) (*Transport Scotland, 2008*). Key outcomes to be addressed by the appraisal included:

- a. whether or not the Strategic Transport Network and planned enhancements are capable of accommodating future land use proposals at agreed performance levels;
- b. the potential impact of no changes in the current or committed Strategic Transport Network;
- c. the nature, scale and location of alternative land use and transport scenarios that could be implemented to more closely align transport supply and demand. Such alternative scenarios could involve either changes in land allocations, in the demand for transport and / or the supply of transport.

Another feature of the guidance was that different “levels” of appraisal have been specified, relating to the amount of detail / quantification that would be expected. Level 1 relates to qualitative appraisal; Level 2 is quantitative using modelling tools on a local authority area wide basis; Level 3 is quantitative using localised modelling tools and preliminary design work. In the case of Aberdeenshire Council, which is responsible for its LDP within an SDP area, guidance suggests that the majority of appraisal will be either Level 2 or Level 3, particularly where specific interventions on the Strategic Transport Network are proposed.

Accordingly, the process prescribed for an LDP within an SDP area is set out in Table 1.

Table 1 – Current Guidance for DPMTAG Input to Development Plan Process⁴

Development Plan Stage	DPMTAG Guidance: Transport Appraisal Tasks
STAGE 1 – Early Engagement Evidence Base Monitoring Statement	Baseline Assessment of current and forecast performance of the Strategic Transport Network
STAGE 2 – Preparing the Plan Main Issues Report	Set out transport planning objectives in the context of the overall plan vision and objectives. Cumulative impact Appraisal, if required. Generation and sifting of transport options. Appraisal of transport options.
STAGE 3 – Proposed Plan Proposed Plan Action Programme	Opportunity to reconsider Transport Options, based on consultation responses. Technical feasibility and outline business case.
STAGE 4 – Delivery Development Management	Technical feasibility and detailed business case. Transport Assessment (informed by Development Plan Transport Appraisal).

It is possible to see that the existing guidance is based on the established principles of Scottish Transport Appraisal Guidance (STAG), with recognisable stages considering problems and opportunities, setting of transport objectives, option generation, and appraisal. However, whilst STAG appraisal is typically concerned with appraising alternative transport related options in the context of a fixed land use strategy, a DPMTAG appraisal provides scope to test alternative land use strategies.

The DPMTAG guidance as written, the timescales and resources available for the work, and the point in the process that the appraisal work commenced combined to present specific challenges for both the transportation and development plan teams within Aberdeenshire Council.

For the transportation team, it was apparent that according the guidance, the process should have commenced prior to the Main Issues Report, and yet it was being conducted at the time that the consultation outcomes report was being reported. With *only* five months available, this effectively ruled out specific additional modelling exercises, which would limit the amount of quantified appraisal that could be undertaken.

Planning colleagues had a different perspective on the above challenges, arguing that the extent of the DPMTAG appraisal would have been far more complex if it been undertaken in advance of the SDP being approved in March 2014, as it was not until this point that there could have been any certainty on the direction of the land use strategy. Any work prior to this would have had to consider far more variants and combinations, which ultimately would have been redundant work. In the context of timescales, planners considered that *only* 5 months was very generous, particularly when viewed against Scottish Government guidance in Circular 6/2013 (*Scottish Government, 2013*) on the timings for the preparation of LDPs,

⁴ Largely based on Figure 2, page 17, of existing DPMTAG guidance.

which imply that it should be possible to move from MIR to proposed plan in just over 4 months. Planners had confidence the level of appraisal that could be undertaken within this timescale would be sufficiently robust for the LDP, considering that:

- a) the previous plan was supported by detailed transport appraisal; and
- b) in the light of the limited amount of new allocations, the DPMTAG could appropriately sense check these within the context of the current transport baseline.

6. A PRAGMATIC APPROACH

There was a clear requirement for Aberdeenshire Council team to develop and implement a proportionate and pragmatic approach, which would not necessarily be in full accordance with guidance. This approach had to recognise that the core components of the emerging land use strategy had already been established in the SDP and also the previous LDP, with proposed changes being largely incremental.

The approach had also to make best use of existing available information and previous work; be focussed on the key corridors of interest; and relate to what were the specific policy and operational issues faced on Aberdeenshire's strategic transport network. Basing the appraisal work on the best practice contained in STAG, the following elements of the approach were established.

- a. Area of interest – the strategic development plan promotes growth along three strategic growth corridors, which correspond with the area's trunk road and rail network. These formed definite focus for the appraisal, which was also extended to include other principal settlements in the Authority. Taking a corridor by corridor approach also corresponded with previous cumulative assessment work undertaken for the SDP.
- b. Developments of interest – the work quickly focussed on unconsented but provisionally allocated developments that were significant in the context of their settlement, or in terms of their potential impact on the adjacent trunk road network. It was decided to base the appraisal on a settlement by settlement basis, reflecting the structure of the LDP. It was considered that a "site by site" appraisal would miss inter-relations between allocations that could be significant at a settlement level.
- c. Understanding of Problems and Opportunities – based on town centre Paramics models, recent Transport Assessment submissions, and other available work.
- d. Transport Planning Objectives – these were developed based on local plan settlement objectives, policy priorities established in SPP, and corridor objectives established for each of the three trunk road sections which were previously set out in STPR. These reflected the need to respond to safety issues, traffic capacity issues, making best use of existing capacity, promoting opportunities for sustainable travel, and also facilitating freight connections.
- e. Appraisal Criteria – with no desire to recreate appraisal process, the appraisal criteria used for a STAG 1 (initial appraisal) approach were deemed appropriate, covering off deliverability considerations, as well as impact on safety, environment, economy, integration, and accessibility / inclusion, but allowing more detail as appropriate.

A key to the success of Aberdeenshire’s DPMTAG appraisal was the willingness of Transport Scotland to engage in early, open and largely positive discussions about the Council’s proposed approach, and joint sharing of available information for specific settlements. Using a STAG 1 (initial appraisal) approach, which had widespread understanding within the transportation teams at the Council and Transport Scotland, also facilitated clear communication of impacts. The approach adopted is set out in Table 2.

Table 2 – Aberdeenshire Council’s Adopted Approach to DPMTAG

Development Plan Stage	DPMTAG Guidance: Transport Appraisal Tasks
STAGE 1 – Early Engagement Evidence Base Monitoring Statement	Cognisance paid to established policy direction, available evidence and previously committed projects.
STAGE 2 – Preparing the Plan Main Issues Report	Review of transport impacts from bid submissions on site by site basis
	DPMTAG Appraisal <ol style="list-style-type: none"> 1. Agree scope of appraisal following discussion with Transport Scotland 2. Review problems and opportunities in each settlement / corridor based on previous work (modelling work, studies, TAs) 3. Identify Transport Planning Objectives based on STPR corridor reports, SPP, and LDP objectives 4. Identification most significant “unconsented” allocations within each corridor 5. Develop options for each settlement based on alternative access arrangements 6. Appraisal of options to STAG 1 7. Discussion with TS and finalisation
STAGE 3 – Proposed Plan Proposed Plan Action Programme	Proposed update of DPMTAG based on any further information obtained during consultation process, prior to examination.
STAGE 4 – Delivery Development Management	Technical feasibility and detailed business case Transport Assessment (informed by Development Plan Transport Appraisal)

7. AN EMERGING PICTURE

An initial appraisal of the allocations enabled early sight of the key issues. Typically, the most significant issues corresponded with the cumulative impact of numerous developments, super-imposed onto congested networks. This situation was identified at Inverurie / Kintore on the A96, Ellon (A90 North), and Portlethen (A90 South). The use of information from previous S-Paramics modelling runs was invaluable in unpacking the impact of individual elements, and considering potential changes to the allocations in the development plan.

Other recurring issues included allocations that had the potential to significantly increase traffic through junctions which had safety issues, and recommendations were made in such instances to consider smaller allocations, or altered access arrangements.

A number of allocations also required either new, or significantly modified trunk road junctions for access. In each case, alternative access strategies could be tested to inform a recommended approach for the specific allocation. In some instances situations were identified where new accesses were being proposed directly onto the trunk road at new priority junctions, for relatively small developments. These would be contrary to policy approach in SPP, and the appraisal enabled alternative options to be pursued.

8. THE ADDED VALUE

At the end of the initial DPMTAG appraisal, each allocation identified as significant had been fully assessed, outcomes discussed with Aberdeenshire's Local Development Plan team and Transport Scotland, and agreement reached on recommended modifications. These recommendations were then used as a basis for the finalisation of the 2016 LDP Proposed Plan (*Aberdeenshire Council, 2015*), which was considered and approved by Aberdeenshire Council in February 2015. The DPMTAG appraisal, and an associated DPMTAG addendum detailing how the outcomes were reflected in the Proposed Plan were also published alongside other supporting technical information such as the Strategic Environmental Appraisal⁵.

The added value of the DPMTAG process was a far more informed picture being provided to officers, Councillors and Transport Scotland, than could have been achieved through site by site assessments. Numerous amendments and alterations were made as a result of the DPMTAG report. Where no changes were made, the assessments provided a clear and consistent statement of the likely issues that would require to be resolved during the application process for any sites coming forward.

Some further specific learning points are listed below.

- a. Planners were very positive about the approach taken and the outcomes, finding it a useful process, which would hopefully assist the passage of the LDP through proposed plan consultation and examination.
- b. Some transport colleagues were also positive, recognising that it helped to make explicit transport considerations on a settlement basis.
- c. A particular challenge was that the appraisal was constantly "chasing a moving target". For some proposed allocations, there continued to be ongoing changes in details, and uncertainties.

⁵ Aberdeenshire 2016 LDP DPMTAG reports and addendum available at http://www.aberdeenshire.gov.uk/planning/plans_policies/ProposedPlan2016.asp

- d. A disadvantage of the bespoke process was that the appraisal team were learning as we went along.
- e. The appraisal did not have the opportunity to fully consider corridor by corridor assessments to the level of detail anticipated by the guidance, due to time constraints. It is anticipated that other ongoing work will provide the opportunity to subsequently consider this.
- f. It would have been an advantage to undertake the appraisal earlier in the process in parallel with the emerging plan proposals being established within the Main Issues Report. However, this would have been at the risk of undertaking work which would ultimately been redundant, had the SDP been changed.
- g. This highlights a requirement for closer “choreography” of the different elements of transport appraisal, LDP process, and SDP process, and the inter-actions between them.

9. WIDER FINDINGS

Development and land use impacts on strategic transport networks needs to be understood and set out within development plans. The fact that any strategic transport interventions required to support plans can have significant delivery timescales coupled with high costs means that understanding the rationale and implications early in the process is essential. Through the discussion in pulling together the DPMTAG assessment for Aberdeenshire and in writing this paper describing the process and the outcomes it was felt important to consider whether wider conclusions be drawn from the example provided.

Reflection on the Aberdeenshire example confirmed that there are perceived timescale and resource implications and a belief that there would be limited added value from employing the methods set out in the current guidance. Also, the understanding that the process is prescriptive and potentially inflexible could be a major factor in the limited use of the guidance to date. This sits somewhat at odds with the intention of the guidance which was aimed at encouraging proportionate appraisal to support deliverable development plans. There are lessons here for both sides in that the guidance may need clarification to make it more accessible but, as already stated, early engagement is key to breaking down the perceived barriers and achieving the best fit with the plan process under consideration.

The suggested timescale and ties with specific stages of the development plan process were not possible due to the stage at which the appraisal was undertaken but this did not stop the outcomes having a positive effect on the Plan and there may be lessons here for more flexibility in general but specifically where development plans are fairly fixed and previous appraisal has been undertaken. However, as noted earlier in the paper, if the appraisal had been started at an earlier stage there may have been more scope to either have more influence on allocations or indeed provide greater clarity on what will be required to support the delivery of allocated sites.

An interesting outcome of the Aberdeenshire initial review of the guidance was that it seemed to present a significantly different appraisal methodology from more standard approaches

and that the preferred means of progressing was to revert back to what was a better understood STAG Initial Appraisal approach. Given that the DPMTAG approach is founded on STAG principles but aimed at being more proportionate this initially seemed counter intuitive. The proportionality issue is emphasised due to the understanding that appraisals are being undertaken at an early stage of the planning process and also because there is an additional variable relating to land use options to be considered. Any appraisal, should be underpinned by knowledge of, and commitment to the core principles of STAG, and wider appraisal philosophy.

The guidance was never intended to be a prescriptive or slavish tick box approach and was intended to promote a methodology for enabling a better understanding of transport issues at an early stage in the planning process. The transport appraisal as part of the evidence base for plans should promote intelligent and value-added appraisals which can be communicated clearly and fit with the wider appraisal of sites, settlements and overall plans.

Following joint consideration of the issues raised during the course of writing this paper the authors have drafted a “Ten Point Plan for DPMTAG appraisal”, aimed at those who may be undertaking or considering such work. Due to the time of writing being in the run up to the general election the following is presented as the ‘DPMTAG manifesto’:

DPMTAG Manifesto

1. **Just do it!** (You’ve probably been doing some of it already)
2. **Make it work for you** at the stage of the process that you’re at.
3. **Use it to communicate** transport issues to decision makers.
4. **Understand the STAG principles**, but apply them with a land use twist.
5. **Be proportionate** – appraisal effort should directly relate to the size of the problem.
6. **Be pragmatic** – make best use of what’s already available.
7. **Be open** – discuss with TS, planners and wider stakeholders early in the process
8. **Enhance the Plan evidence base and decision making process** – expose and challenge accepted wisdom.
9. **Be realistic** - Transport is not the sole basis of decision making; but the appraisal can lay out the consequences and risks of certain decisions.
10. **Use it to help de-risk the Plan** and inform the Action Programme.

Applying the above approach and carrying outcomes through to Development Plans and Action Programmes will help deliver the evidence based planning approach which is aspired to in the Scottish system and aid future sustainable economic growth as a result.

10. SUMMARY

Aberdeenshire Council's approach to the production of a DPMTAG assessment to support the preparation of their 2016 Local Development Plan has been both proportionate and pragmatic, but yielded benefit to the Local Development Plan Process. It has provided relevant stakeholders with a broad evidence base, facilitated by existing available information, enabling recommendations to be made on changes to proposed allocations. Despite the exercise being taken at a potentially sub-optimal time, the approach taken has not delayed the LDP process, and been flexible enough to accommodate late revisions and additions to proposed allocations. Although perhaps not fully meeting all the requirements of DPMTAG guidance, the benefits of the approach that has been taken has been considered to have benefitted the LDP process.

From Transport Scotland's perspective, a review and update of DPMTAG is currently underway due to a number of changes to relevant policies which have taken place since 2011. The process also provides an opportunity to reflect on user views which have developed since the introduction of the guidance and to raise the profile of the approach in relation to LDP and SDP processes. The lessons learned from the Aberdeenshire example will be fed into this process and will help to shape the emerging updated guidance.

BIBLIOGRAPHY

Aberdeen City and Shire SDPA (2014), *Aberdeen City and Shire Strategic Development Plan*, Aberdeen City and Shire SDPA, Aberdeenshire Council

Available at: <http://www.aberdeencityandshire-sdpa.gov.uk/nmsruntime/saveasdialog.asp?IID=1111&SID=8>

Aberdeenshire Council (2012), *Aberdeenshire Local Development Plan 2012*, Aberdeenshire Council, Aberdeen.

Available at: https://www.aberdeenshire.gov.uk/planning/plans_policies/plan.asp

Aberdeenshire Council (2013), *Aberdeenshire Local Development Plan 2016 Main Issues Report*. Published on-line.

Available at:

https://www.aberdeenshire.gov.uk/planning/plans_policies/MainIssuesReport.asp

Aberdeenshire Council (2015), *Aberdeenshire Local Development Plan 2016 Proposed Plan*, Aberdeenshire Council, Aberdeen.

Available at:

https://www.aberdeenshire.gov.uk/planning/plans_policies/ProposedPlan2016.asp

Scottish Government (2013), *Scottish Planning Series, Planning Circular 6/2013, Development Planning*. Scottish Government, Edinburgh.

Available at: <http://www.gov.scot/Resource/0044/00441577.pdf>

Scottish Government (2014), *Scottish Planning Policy*, Scottish Government, Edinburgh.

Available at: <http://www.gov.scot/Publications/2014/06/5823>

Transport Scotland (2008), *Scottish Transport Appraisal Guidance*. Transport Scotland, Glasgow.

Available at: <http://www.transportscotland.gov.uk/stag>

Transport Scotland (2011), *Development Planning and Management Transport Appraisal Guidance*, Transport Scotland, Glasgow.

Available at: <http://www.transportscotland.gov.uk/report/j184585-00.htm>