

Mr Alex Lessware
Office of the Deputy Prime Minister
Planning Policies Division (2)
Zone 4/J5
Eland House
Bressenden Place
London SW1E 5DU

27 February 2006

Dear Mr Lessware,

PPS3 Consultation

IHE is the professional institution for practitioners implementing highway and transportation policy. The Institute is the leading forum for highway development control staff as evidenced by our unique training and certification scheme. It is on the experience of these members that our comments are based.

1. We welcome the emphasis on design quality which embeds the principles of PPS1.

However, the guidance is very broad brush and market focussed. There is little on transportation, thus, no mention of residential travel plans to deliver sustainability objectives or of the forthcoming Manual for Streets or home zones.

2. Whilst welcoming the withdrawal of the PPG3 parking guide standards of 1.5 off-street parking spaces per dwelling, its replacement, para 20, is inadequate.

As para 35 recognises, detailed guidance can accelerate the development control process. It is therefore much to be hoped that the research commissioned from WSP and reported at TRICS 2005 will be incorporated into accompanying guidance to PPS3- and soon. The methodology would make a significant contribution to local authorities developing credible local standards. It is vital that such policies are based on rigorous research which can be defended in negotiations with developers. Developers themselves also welcome transparent standards as setting clear parameters in which they can work.

3. The Government's objective to ensure that homes are provided "in a community where they (everyone) want to live" is not carried through into the sustainability appraisal (para 7). PPS3 is silent on the relationship between the LDF process and the Planning Gain Consultation. The proportion of the Planning Gain Supplement to be awarded to Local Planning Authorities to fund transport and community infrastructure is unknown. It is likely that LPAs will need to find resources for the increase in front end work to identify and cost detailed proposals to accommodate development.

Guidance on implementation of policy is lacking elsewhere; thus the assessment of "sustainable location" and "well served by public transport" are quite subjective. Presumably much will be covered by the promised accompanying guidance.

4. The document is not adequate in relation to shire counties. There are references to rural housing but the "locations" are too nebulous to be useful.

Yours sincerely,

Secretary