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Institutional Coordination in the UK: The Strengths and Weaknesses of a Variable System

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Introduction

This paper describes the ways in which responsibilities for local government, transport and land use have been managed in the Great Britain over the last three decades. It presents a picture of frequent change and considerable variation currently between parts of the country. While this offers a laboratory in which comparisons can be made, the process of change has itself had significant impacts on the performance of the land use – transport system. These are of direct interest to the workshop session on coordination, but they also have implications for other sessions on the national framework, multi-modal planning, fiscal and regulatory issues and monitoring and feedback.

The next three sections describe in turn the changes in local government structure, transport and land use responsibilities since the early 1970s. The current situation is summarised in the next section, and this is followed by an assessment of the current arrangements against the ECMT recommendations (ECMT, 2002). The final section lists implications for the workshop.

Local government structure

The early 1970s saw the end of a period of almost 100 years of stability in the structure of local government in Great Britain (arrangements in Northern Ireland have always been different, and are not covered here). In rural areas a two tier system operated, with a county council having strategic responsibilities, and urban and rural district councils having local responsibilities. In urban areas, county boroughs were established which acted as unitary authorities for their areas. Counties differed widely in size and population, from over three million to under 100,000, and many district councils had a very small population base and few staff. The only significant change to this pattern had been the establishment, in 1965, of the Greater London Council, which was the UK’s first strategic authority, with a population of almost 8 million and 33 London Boroughs pursuing local responsibilities.

The government had become increasingly concerned that this system was inefficient, and attempted to emulate the developments in London elsewhere in the country. In England, six metropolitan county councils were established covering the principal provincial conurbations, three other new urban county councils were formed covering Bristol, Hull and Middlesbrough, and some rural counties were merged. A similar pattern was adopted in Wales, with fewer larger rural counties, and a restructuring in urban south Wales. In Scotland, regional councils were established, with the largest, Strathclyde, centred on Glasgow, including almost half of Scotland’s population. In all cases these were the upper tier of a two tier structure, with lower tier district councils formed from mergers of earlier authorities.

This structure remained largely unchanged until 1986 when the Thatcher government, frustrated by the approach adopted by the Greater London Council, decided to abolish it and the six metropolitan county councils. All powers were transferred to the district councils; in London the London Planning Advisory Committee was established in an attempt to coordinate the management of the capital by its 33 boroughs. Gradually over the next decade the other new urban county councils were abandoned, and several unitary authorities were established for urban areas with populations in excess of 150,000. In 1996 a major restructuring took place in Scotland, with the regional councils being abolished and all local government handed to unitary authorities.

In 2000 the new labour administration introduced two changes which began to reverse the policies of the conservative government. A new Greater London Authority was established, with rather different powers from the GLC, and a much smaller establishment. Most domestic governmental responsibilities were devolved to new Scottish and Welsh governments, giving them direct responsibilities for areas with...
populations a little smaller than London’s. In addition, throughout local government, new ways of working were established. Cabinet-style government was encouraged, resulting in fewer, more expert, politicians becoming involved in particular policy areas. Performance assessments were strengthened through the application of Best Value principles, Comprehensive Performance Assessments, and Local Public Service Agreements. Funding was also changed, with the introduction of a “Single Capital Pot” giving authorities flexibility to reallocate funds between service areas.

Currently there are proposals to introduce regional government for the first time elsewhere in England. Local electors will be given the opportunity to decide whether they wish to have a regional government; if they do, new elected regional authorities will be introduced, and any two tier government structures within their regions will be replaced by unitary authorities. A typical English regional authority would have a population of around 4m to 6m.

While most of these changes have been justified as ways of achieving more efficient local government, it has to be remembered that there are significant costs involved with each restructuring. It has been estimated that it takes around three years for a new structure to become fully operational. In some areas which will have seen three changes in as many decades, the impact on effective policy development has been substantial.

Transport responsibilities

In the early 1970s, central government had responsibility for the national road network and the rail network, and provided support to local government for local transport. County councils had responsibility for the local road network and for support for bus services. District councils typically looked after off street parking. In London, London Transport had responsibility for the bus and underground networks, but not for suburban rail services; in four provincial conurbations, Passenger Transport Executives were established in 1968 to support the coordination of public transport, and these were extended to all the new metropolitan councils in 1974. Arrangements for financing local transport were project-specific and fragmented.

A major change was introduced in 1974 with the requirement for all county councils to produce Transport Policies and Programmes (Mackie and Garton, 1979). These were designed to:

- promote comprehensive transport plans;
- eliminate bias towards capital or current expenditure;
- distribute grant to reflect need; and
- reduce detailed government supervision of local transport.

Local authorities were required to specify their objectives and ten year strategy, set out a five year rolling expenditure programme and provide an annual statement of expenditure and progress. In return they received project-specific grants for road, parking and public transport infrastructure, more flexible financial support for traffic management, road safety, maintenance, and revenue support for public transport and parking.

Gradually, however, the flexibility of the TPP system was eroded by successive governments, initially in response to financial crises and subsequently reflecting changing political dogma. Revenue support for public transport was curtailed in the late 1970s, and overall levels of government support much reduced. In the early 1980s a separate approach was adopted to the financing of public transport, parking was required to be treated commercially, and government grants were limited to “roads of more than local importance”. By this stage most of the 1974 objectives were no longer achievable, and funding of
transport was once again highly fragmented. Abolition of the GLC and the metropolitan county councils in 1986 intensified this process, leaving no body responsible for conurbation-wide transport and a serious loss of the specialist expertise which those authorities had amassed (Gwilliam et al, 1984). Gradually during the 1990s local authorities became aware of the benefits of integrated transport planning, both between modes and between authorities (May, 1991, May and Roberts, 1995) and this led to the introduction of the “Package Approach” to TPPs, in which groups of authorities in a conurbation could develop a joint TPP submission, identifying priorities between authorities (Roberts, 1995).

The deregulation of bus services outside London in 1986 led to further fragmentation, made worse by the way in which it was done. Private operators could run whichever services they wished, and had to give only six weeks' notice of any changes. Local authorities were then left to identify additional services for which there was a social need, invite tenders for them, and provide the required level of subsidy. They had no influence over fares, only residual influence over service patterns and frequencies, and could do little to encourage consistent information provision or fares structures. While subsidy costs fell, patronage fell more dramatically (AMA, 1990). By contrast, London adopted a franchising model much more similar to that in continental Europe, with London Transport specifying routes, frequencies and fare levels, and private operators bidding to run services for the lowest subsidy. Although comparisons are difficult, this appears to have proved much more effective (Mackie et al, 1995).

Subsequently the last conservative government privatised the rail network between 1993 and 1995, leading to both horizontal and vertical disintegration in provision. Twenty two private operating companies were established, with little competition between them; sixteen of these replaced the British Rail service provision into London. They were answerable to two regulatory bodies, while track operation was the responsibility of another private company and rolling stock was leased by several others. Unlike bus deregulation, rail privatisation did lead to an increase in patronage, but costs of service and infrastructure provision escalated, and a series of accidents led to growing disquiet over safety. For local government negotiation for changes in service provision became increasingly complex (Knowles, 1998).

The new labour government in 1997 made clear its intention to improve transport provision (DETR, 1998). An early decision was taken that it would be too expensive to re-nationalise bus and rail services, so efforts were made to streamline operations, through negotiable bus quality partnerships (Huntley, 2001) and the introduction of a Strategic Rail Authority. A Ten Year Plan for transport was launched in 2001 (DETR, 2000a), promising £180 billion in investment over the period and setting challenging targets for modal shift, and reductions in congestion, pollution and accidents. The Greater London Authority and, subsequently, all other local authorities were provided with powers to introduce road pricing (“congestion charging”) and charges on work-place parking, with revenues hypothecated for the improvement of transport.

By far the most important development for urban transport in England outside London was the introduction of Local Transport Plans (LTPs) from 2000 (DETR, 2000b). These replaced the annual TPP statement with a five year LTP and an Annual Progress Report. LTPs were designed to provide an improvement over TPPs by:

- providing longer term consistency
- being strategic planning documents as well as bidding documents
- covering both capital and revenue spending
- giving greater local discretion and flexibility in funding
- being more inclusive, through increased consultation and stakeholder participation
- being based more directly on objectives, targets and monitoring
- emphasising an integrated approach (DETR, 2000b).
Local authorities were required to adopt a consistent approach in which they set objectives (which were to be based on the government’s national objectives of environment, safety, an efficient economy, accessibility for all and integration (DETR, 1998); identified problems; developed a strategy to tackle those problems; demonstrated that that strategy was the most cost effective approach; produced a five year plan to implement that strategy; and set targets against which performance could be monitored annually. The whole process was to be developed in consultation with operators, the business community, interest groups and the public. In response, government provided local authorities with a one year financial allocation and a five year indicative sum. These were then reviewed each year, in the light of the APR statement. At the same time, the government assessed the LTP or APR publicly on a five point scale from “well above average” to “well below average”. Latterly this assessment, and the resulting funding, have been influenced increasingly by performance against the targets set in the LTP.

Subsequently, the move to greater regional planning has led to the introduction of Regional Transport Strategies, which were first produced in 2001. These were designed to provide a context for LTPs, but were published after them. The intention is that they will be revised and become statutory documents from 2005, and provide the context for the next round of LTPs, which are also due in 2005.

**Planning responsibilities**

By comparison, the land use planning process, at least in terms of statutory requirements, has been much more stable. The principles of the planning system are stated as follows (DoE, 1997): “The planning system regulates the development and use of land in the public interest. The system as a whole, and the preparation of development plans in particular, is the most effective way of reconciling the demand for development and the protection of the environment.”

The system is “plan-led” and is currently implemented through three types of plan, each of which is updated roughly every five years:

- Structure Plans, produced by county councils;
- Local Plans, produced by district councils; and
- Unitary Development Plans, produced by unitary authorities.

Structure Plans cover strategic issues, while Local Plans indicate the detailed application of the strategy, and specify the permitted types of development in different areas. Unitary Development Plans combine both. Local authorities then consider planning applications for particular sites, and decide whether to grant planning permission and, if so, whether to impose conditions. Planning permissions are valid for five years, and may be extended for a further five.

Government provides guidance on Plan preparation and planning decisions through a series of Planning Policy Guidance (PPG) documents, of which one, PPG13, focuses specifically on the links with transport. PPG13 was first published in 1994 (DoE, 1994) and subsequently revised in 2001 (DETR, 2001). Its objectives are stated as being:

- to promote more sustainable choices for both people and freight;
- to promote accessibility by public transport, walking and cycling; and
- to reduce the need to travel, especially by car.

Specific recommendations include:

- ensuring that the Development Plan and LTP are consistent and complementary;
- focusing major travel generators in centres and close to public transport;
- locating “day to day” facilities so that they are accessible on foot and by cycle;
accommodating housing in urban areas, at increased densities and where access by public transport, walking and cycling is good; and
• using parking policies to reduce reliance on the car.

It includes specific provisions for:
• maximum parking standards for development to be applied nation-wide;
• public transport accessibility criteria to be used in selecting the best locations for new development;
• transport assessments for major developments; and
• a requirement for company travel plans (Rye, 1999) as a condition of planning permission in certain circumstances.

In addition, each region produces a Regional Planning Guidance statement, which includes the Regional Transport Strategy, and is intended to provide a context for individual authorities’ Development Plans, and to encourage consistency between them.

While the planning system thus provides consistent advice to all local authorities, and has remained reasonably constant over time, it is still open to changes in emphasis and interpretation, and these impose significant lags in the outcome of the process. At the first level, Development Plans only indicate the types of development which might be accepted; they do not direct developers to pursue particular opportunities, and the whole system is dependent on the preferences of developers. At the second level, local authorities themselves can interpret their own plans in different ways, and it is common for an authority keen to attract economic development to relax its requirements. Finally, any developer who is refused permission can appeal to central government, and it is not unusual for refusals to be overturned. In the 1980s and early 1990s in particular, central government favoured a reasonably free market in development, with few restraints in the interests of the environment. This led to considerable growth in out of town retail and business development, and extensive low density residential development. Local authorities which wished to discourage such developments were very likely to find central government supporting developers against them. In addition, in areas in need of economic regeneration, the government introduced schemes in which planning controls were substantially relaxed, leading to inconsistency in development control within urban areas. Because such planning permissions can remain active for ten years, the impacts of such policies are still being felt well after the government changed direction.

There are currently plans for significant changes in the planning process. Government has argued that the two tier planning process is inefficient and inflexible, and it intends to replace all current Plans by Local Development Frameworks, to be produced by district councils and unitary authorities, and updated annually. One side effect of this would be that responsibilities for LTPs and Structure Plans, which now both reside with county councils, would be divorced. At the same time it is proposing to replace Regional Planning Guidance by statutory Regional Spatial Strategies, which would provide the context for Local Development Frameworks, and would include the revised, statutory, Regional Transport Strategies.

The current situation

It will be clear from the above that local government, transport and planning responsibilities in the UK are in a continuing state of flux. Most of the changes envisaged over the next few years focus on greater responsibility at a regional level, which should encourage a greater emphasis on strategic thinking and consistency. However, it is possible to take a snapshot of the current arrangements, and assess their performance.
There are currently seven different structures of local government within Great Britain:

- the Greater London Authority and London Boroughs within London
- Metropolitan Districts and Passenger Transport Executives in the old metropolitan county areas (and Glasgow)
- Unitary authorities in the larger English towns outside the conurbations
- County and district councils in most of rural England
- Unitary authorities reporting to the Scottish Executive in Scotland
- A largely two tier structure reporting to the Welsh Assembly in Wales.

It could be argued that this rich mix of different structures provides a valuable opportunity to identify the strengths and weakness of each.

Responsibility for local transport rests largely with the higher tier authorities where two exist, though some responsibilities, including parking and, in London, local street management, rest with the lower tier. However, many parts of the transport system are outside the direct influence of local government. In particular:

- roads which are part of the national road network are the responsibility of the Highways Agency
- all new rail infrastructure projects (except light rail schemes unconnected to the network) have to be agreed with the Strategic Rail Authority and Network Rail
- all changes in rail services have to be agreed with the relevant operator
- all changes in bus services outside London have to be negotiated with the relevant operators
- local authorities outside London have no influence over bus and rail fares; even in London this influence does not extend to the surface rail network
- local authorities can only encourage the provision of appropriate information on public transport services
- local authorities have little direct control on the operation of privately owned public car parks
- local authorities can only control the way in which private car parks are operated if they introduce a workplace parking levy.

The lack of direct control over public transport services and fares and parking charges is a particular weakness; research suggests that it is these three instruments in particular which are central to the design of an optimal transport strategy (May et al, 2000).

Against this fragmented structure, the LTP process, in England outside London at least, has been judged a significant success. A recent report has conducted an evaluation of the process (Atkins, 2003). It concluded that the introduction of LTPs has been widely welcomed by local authorities and has largely met the objectives set out above. Among its particular strengths have been the focus on objectives; the five year timescale and the stability which this brings; the flexibility in allocating funding; the emphasis on integration; and the encouragement of consultation and partnership. Introduction was, however, affected by the scale of the change required, particularly for some of the smaller, newer unitary authorities; lack of organisational capacity and political leadership in some authorities; the substantial increase in capital funding available; and the shortage of skills available for planning and implementation (Atkins, 2003; TPSI, 2003). The main weaknesses identified by local authorities included:

- the tendency for the LTP still to be a bidding document for capital projects
- the commensurate lack of emphasis on revenue funding
- the instability introduced by the Single Capital Pot, which allows other sectors to compete for funding allocated for transport
- lack of guidance on stakeholder involvement
- over-emphasis on targets, and limited experience of appropriate target setting
- limited access to analytical tools
• lack of integration with the Highways Agency and the Strategic Rail Authority
• limited integration with regional planning (Atkins, 2003).

Partly as a result, the report concluded that local authorities were giving too little emphasis to awareness raising, provision for pedestrians, taxis, freight distribution and demand management.

A separate study into the role of guidance in support of the LTP process reviewed local authority decision-making against the “vigilant” model of effective decision-making (SDG, 2003). This identified the following criteria:

• collection of information before making a decision
• establishing the existence of a problem and the need to solve it
• considering the range of criteria (or objectives) which any solution should address
• identifying more than one policy or line of action
• assessing the costs and benefits of each alternative policy
• conducting a comprehensive, coherent and detailed analysis of the elements of the problem, and of the relationships between them
• searching for new information, and processing it in an open-minded way
• re-examining the consequences of each policy before making a final choice
• explicitly trading off costs against benefits
• considering how the chosen policy is to be put into practice, paying special attention to contingency planning.

While the study found evidence of the LTP process encouraging local authorities to satisfy many of these criteria, it found little evidence of the identification of alternative policies, with many authorities already wedded to a particular course of action or infrastructure project, and many ruling out demand management approaches for fear of public opposition. They also found no evidence of effective contingency planning.

The same study was critical of the approach to target setting, observing that many local authorities were slow to set targets or the monitor performance against them, and that several targets were unchallenging. Both studies noted an over-reliance on input and output targets, rather than on outcome targets which measure performance against objectives. Our own work has shown that an emphasis on modal share targets can lead to a strategy which is less effective when measured against its objectives (Emberger et al, 2003).

Effective land use planning is increasingly seen as an important complement to transport planning. While transport problems are most effectively resolved by the use of transport policy instruments, an appropriate land use pattern can reinforce those policy instruments and make them easier to implement (Grieving and Wegener, 2003). These considerations are generally well reflected in the government’s guidance in PPG13 (DETR, 2001). However, that guidance is not always applied in practice. In two tier local government structures, detailed planning decisions are taken at the district level, while transport strategy is formulated at the county level, and this is to be accentuated under the government’s current proposals. Even where the two functions are conducted within one authority, it is frequently the case that they are dealt with in different departments, with relatively limited coordination between them. The study of the LTP process noted that few authorities were yet applying the recommendations in PPG13 for consistent parking standards or public transport accessibility criteria (Atkins, 2003). Even where this is happening, the actual pattern of development will continue to be influenced for some time by the more laissez faire and less environmentally conscious planning decisions of the early 1990s.
A critical assessment

While the LTP process in the UK, in particular, has been shown to be successful and worthy of transfer elsewhere, there is much in the remaining structure of transport and land use responsibilities which is a cause for concern. The process is assessed here against the recommendations of the ECMT report (ECMT, 2002):

1. **Develop a national policy framework for sustainable urban transport to support and influence national, regional and local goals for land use, passenger and freight transport, health and the environment.** The UK has clearly developed a policy framework for its own national strategy and, through the LTP process, for local transport. Its plans for regional planning and government should strengthen the framework at a regional level, and provide for more consistency between local authorities within a region. The use of a common set of objectives, a common process and a standard appraisal mechanism all help to ensure consistency. However, there are elements of the institutional structure, as discussed below, which severely limit the effectiveness of the policy framework. In general, less emphasis is given to freight than to passenger transport. While guidance is given on appropriate land use planning, the policy framework does not as yet do enough to encourage consistency between these areas; again the emerging proposals for regional planning should help. Environmental concerns are central to both transport and land use policies, but health issues have until recently been given much less emphasis (Jones et al, 2003). This may well change in the next round of LTPs.

2. **Improve institutional coordination and cooperation.** Coordination between local authorities and between local and central government is generally good, though the complexity of the structure leads to opportunities for conflict. The relationships with regional bodies are still weak and uncertain. However, the greatest weaknesses are in the relationships between local government and the government’s Highways Agency and Strategic Rail Authority, and between local authorities and bus and rail operators. Only for buses in London is the latter effectively managed through a franchising model. Elsewhere the inability to influence public transport decisions leaves any attempt at an integrated transport strategy severely unintegrated. Generally, the refusal of the Strategic Rail Authority to take the needs of local transport strategies seriously is a major area of criticism.

3. **Encourage effective public participation, partnerships and communication.** The LTP process has certainly encouraged public participation, and it has stimulated partnerships between local authorities and between them and operators. However, as the Atkins report (Atkins, 2003) notes, these processes are still in their infancy, and much more experience, and guidance on good practice, are needed.

4. **Provide a supportive legal and regulatory framework.** In some ways the UK legal framework is ahead of those elsewhere. In particular its provision for congestion charging and workplace parking levies is not matched elsewhere in Europe. However, in the area of public transport, it is the regulatory framework which causes the lack of coordination referred to above. More generally, land use planning guidance is still that; it has no statutory impact. The intention to make the Regional Spatial Strategy and the Regional Transport Strategy statutory documents may well help.

5. **Ensure a comprehensive pricing and fiscal structure.** As yet there is no such structure in the UK. Pricing of public transport is largely determined by the operators, with some limited influence by the Rail Regulator. Taxation policy is determined by government, and influences the costs of vehicle ownership and use and, in the case of company cars, the extent of the benefit of being
given a car by one’s employer. Parking charges are determined in part by local government, and in part by the private sector. However, as noted, the potential for local authorities to impose road user charges is an important step forward. More generally there is a proposal for the introduction of distance based charges at a national level, initially for freight vehicles and potentially for all traffic (CiTT, 2002).

6. **Rationalise financing and investment streams.** It is clear that the LTP process has gone some considerable way to achieving this. There is now greater consistency in the financing of infrastructure projects, and more opportunity to use finance flexibly. However, there remains a mismatch between the allocation of capital and revenue budgets, which in turn still leads to an overemphasis on investment rather than on more effective management of the existing infrastructure.

7. **Improve data collection, monitoring and research.** The government actively encourages data collection, target setting and monitoring. However, as noted above, more guidance is needed on effective target setting, and there is also a growing concern that too many indicators are being identified for monitoring. More guidance is needed on good practice in this area. One related area of concern in the Atkins report (Atkins, 2003) was the uneven use of decision-support tools for prediction and analysis. The UK government has an extensive research programme into many of these areas. Where it is perhaps weaker is in its investment into empirical research into the performance, and transferability, of novel policy instruments.

**Implications**

As noted at the outset, this paper is being presented in the session on coordination and cooperation. However, it also raises issues of potential relevance to other sessions, and these are listed below in the order of the sessions.

**National and local level**
The UK Local Transport Plan process is a valuable example of good practice in the development of a national framework. The adoption of a common set of objectives, a consistent process and a common approach to appraisal have all helped to ensure that local and national policies are reasonably consistent. While regional planning in the UK is still in its infancy, there is the potential for a similar approach to ensure compatibility across all three tiers of government. While the LTP process should stimulate more effective implementation, it does not directly establish improved procedures for doing so. A particular weakness of the UK system is the frequency with which local government structures and responsibilities are changed, and the resulting loss of momentum and consistency over time.

**Coordination and cooperation**
The UK offers a few good examples, and several poor ones, of support for coordination and cooperation. On the positive side, adjacent authorities are encouraged to cooperate in the preparation of LTPs, and the emerging regional structure should help to ensure that they do in practice cooperate in achieving sustainability goals, rather than simply competing in the interests of economic growth. There has been rather less success in supporting coordination between transport and land use planning, partly because the land use policies are set out as guidance rather than being statutory, and partly because transport and land use are often the responsibility of different tiers of government, or of different departments within an authority. Coordination with policy in other sectors such as health and education is even less well developed, but it is increasingly becoming accepted that it is needed. By far the weakest areas of cooperation, however, are those which are most central to transport policy: those between local
government and the central government’s Highways Agency and Strategic Rail Authority, and between local government and the private operators of bus and rail services.

**Multi-modal transport planning**

The lack of coordination between local government and private operators makes it very difficult to develop multi-modal passenger transport strategies. While provision for the private car, walking and cycling can be coordinated, public transport service levels and fare structures cannot be integrated with them. Freight transport planning is typically given much less emphasis than passenger transport planning in urban areas, and is largely treated as unimodal.

**Public engagement**

The LTP process advocates widespread consultation and involvement in the development of transport strategies. However, relatively little guidance is given on good practice and, as a result, performance has been mixed. This is an aspect of local transport planning which it is accepted needs to be improved in the next round of LTPs.

**Fiscal and regulatory structures**

The LTP process has introduced greater flexibility into the financing of local transport, but still encourages an undue emphasis on capital rather than revenue budgets; this in turn leads to strategies which over-emphasise the role of new infrastructure. The fiscal structure is disjointed, with elements of the costs of transport use determined by central government, its agencies and regulators, the private sector and local government. However, the availability of powers to charge for road use and for private parking substantially strengthens the role of local government. The main regulatory weaknesses relate to the role of private sector operators. Neither the process for deregulation of buses nor that for privatisation of the railways adequately balanced the private sector interest in profitability with the public sector concerns for efficiency and sustainability.

**Monitoring and feedback**

Local authorities have been required, in the LTP process, to set targets and monitor performance, and these have increased local government’s ability to compare performance over time and between areas. However, there remain concerns over the excessive number of performance indicators, the focus on input and process indicators rather than outcome ones, and the ways in which targets are set. Generally, there is still insufficient post-scheme evaluation, and hence too little opportunity to learn from successes and failures.
References


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