

Transport Planning Society

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Transport Planning Society Response to Government Consultation on Proposed Reforms to the National Planning Policy Framework

Background to the Transport Planning Society

The Transport Planning Society (TPS) is the UK body that represents the transport planning profession. Its mission is to facilitate, develop and promote best practice and innovation in transport planning and provide a focus for dialogue between all those engaged in it whatever their background.

Given the area of expertise for our membership, we have focussed the majority of our comments in relation to question 69 and the introduction of a vision-led approach to understanding and mitigating transport impacts of new development. We have however also provided comments on q23 with respect to grey-belt at the end of this submission, and additionally fed our views on other matters to inform the wider responses by the RTPi and CIHT.

To assist the Ministry of Housing Communities and Local Government (MHCLG) TPS has provided its recommendations **in bold** along with narrative to explain its thinking. Below is a summary of all the key recommendations we are making.

Summary of TPS recommendations on reviewed NPPF

- **Important to recognise the role of transport in promoting community health and tackling the scourge of childhood obesity.**
- **The move to a vision-led approach has important ramifications across the transport sector, and not only in relation to the planning of new development. A response on these implications needs to be provided should these changes be adopted, to provide clarity to a wide range of scheme promoters and avoid expensive legal challenges.**
- **The TPS is concerned that, given the importance of new Transport Assessment guidance in the context of a completely new way of working for the sector, sufficient time is taken to ensure that it is fit for purpose and that views from the wide range of stakeholders that will need to use this document are sought to ensure that it works effectively in practice.**
- **Provide clarity on the scenarios that must be tested for different types of development; how they should be developed; who decides their acceptability and under what criteria.**
- **Publish an unambiguous definition of ‘vision-led’ transport planning and its clearly stated objectives.**
- **A vision-led approach to placemaking is different to a vision-led approach to access and this needs to be carefully articulated in future guidance.**

- **Revise wording to reduce ambiguity and clearly emphasise the need for vision-led transport to optimise access by sustainable transport modes.**
- **Clearly state and call out the problems with the existing approaches to transport planning for development that the new approach intends to address.**
- **As a minimum, delete the word “only” from the current paragraph (consultation draft paragraph 113). Remove ‘impact on highway safety’ and replace it with ‘safety concerns’ (consultation draft paragraph 113).**
- **Ideally change paragraph 113 (consultation draft) to: “Development should be prevented or refused on transport grounds if there would be unacceptable safety concerns, or over-reliance on vehicular access and/or failure to optimise access by sustainable transport modes, tested in accordance with key scenarios as defined by the DfT.”**
- **New guidance should clearly state that any sanctions for non-delivery of the stated objectives of a vision-led approach must be related to delivering the agreed vision (ideally maximising sustainable access), rather than reverting to a highways-based approach.**
- **Issue clear guidance that rejects the use of historical traffic data to build a worse-case baseline from which development impacts are assessed.**
- **Analyse results from those developments that have applied approaches in line with the intended ‘vision-led’ approach and identify opportunities and issues experienced for further dissemination.**
- **To inform the new guidance, it would be beneficial to engage closely with a representative group of highway authorities to understand why they do not consider that they are currently empowered to deliver the types of development their stated policies clearly aspire to.**
- **Travel Plans are a key part of a vision-led approach and the new guidance should explain clearly their intended function and what they should contain.**
- **Produce parameters for vision-led transport in terms of aspirational mode-use targets for different geographies.**
- **Commit to running a series of training workshops and the provision of independent technical support to assist in the re-training of professionals working in development management /planning in the public sector.**
- **Government guidance on the use of planning conditions should be revised to re-set case precedent and clarify how key elements of a vision-led strategy should be enforced and what interventions are considered reasonable, relevant and necessary.**
- **Commission pilots to help formulate learning and best practice.**
- **Ensure that the selection of ‘New Towns’ builds on the pioneering work undertaken by Create Streets and Sustrans¹ to optimise accessibility by sustainable modes.**
- **Guidance is required on implications for existing local plans from a move to a vision-led system.**
- **Government should commit to a date on when it will publish updated guidance on Local Transport Plans reflecting the adoption of vision-led and its relationship with Local Plans.**
- **Ensure that grey belt land releases conform to a sustainable transport access requirement.**

Background to the consultation and general observations

¹ [Road to Nowhere Indesign \[01.03.24\].indd \(sustrans.org.uk\)](#)

On 30 July MHCLG launched an open consultation on proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. The consultation seeks views on the proposed approach to revising the NPPF to achieve sustainable growth through the planning system, particularly with respect to increasing the housing supply. It also seeks views on a series of wider policy proposals in relation to increasing planning fees, local plan intervention criteria and appropriate thresholds for certain Nationally Significant Infrastructure Projects.

Angela Rayner, Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government, announced plans to stimulate the delivery of new homes to address a well-documented shortage of housing in a letter² to local authority Leaders and Chief Executives. She emphasised that the plan is ambitious, radical and not without controversy, but justified this by the urgency of the need to address housing, particularly the need for social and affordable homes. She set out proposals to introduce changes to:

- take a vision-led approach to transport planning, challenging the now outdated default assumption of automatic traffic growth;
- promote healthy communities, in particular tackling the scourge of childhood obesity.

TPS welcome the emphasis on health. However, there was a missed opportunity to reinforce the inter-relationship with transport planning, particularly the need for a renewed emphasis on active travel. Health is already considered one of the key benefits of active mode schemes in transport appraisal. Stressing this inter-dependency would promote consistency with internal DfT advice on good practice.

TPS notes that, within the accompanying commentary to these changes, the government is formally acknowledging that a default assumption of automatic traffic growth is outdated. TPS welcomes what appears to be the government's signposting of a significant and radical departure from current technical practice. This challenges a default assumption that all housing developments will automatically contribute to growth in vehicle trips, whereas the implementation of a package of sustainable transport measures (via a vision-led approach) means this may not be the case.

Our members have however noted that this throws into debate the wider validity of current Department for Transport (DfT) guidelines on the use of TEMPro software to access the National Trip End Model (NTEM) datasets required as part of the process of forecasting the impact of transport projects as described in the DfT's TAG Unit M. To expand, there is currently a feedback loop in transport assessment where NTEM growth is reliant on traffic growth incorporated into Local Plans which are then fed into NTEM predictions. For most planning applications the relevant Highway Authority currently requires the applicant to assume traffic growth – otherwise known as “predict and provide”.

A change of approach to adopt vision-led transport planning means that many highway projects, the need for which is based on the current NTEM data, could be called into question. DfT should therefore promptly issue guidance on its use following reform to the NPPF, potentially through the provision of additional Common Analytical Scenarios which will be required to inform local scenarios which, aligned with the vision, do not lead to traffic growth. Perception within the industry is that this approach might be little more than a patch and continuing as we are without some change to the NTEM output would be fraught with challenge.

² [Letter from the Deputy Prime Minister to local authorities Leaders in England: Playing your part in building the homes we need \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674422/letter-from-the-deputy-prime-minister-to-local-authorities-leaders-in-england-playing-your-part-in-building-the-homes-we-need.pdf)

Given this requirement of increasing complexity, TPS suggest that this provides a logical break point for the adoption of a reformed, simpler methodological approach that is in itself less reliant on complex scenario testing. TPS would look to be closely involved in the development of that new approach.

- **Important to recognise the role of transport in promoting community health and tackling the scourge of childhood obesity.**
- **The move to a vision-led approach has important ramifications across the transport sector, and not only in relation to the planning of new development. A response on these implications needs to be provided should these changes be adopted, to provide clarity to a wide range of scheme promoters and avoid expensive legal challenges.**

Proposals

The proposed NPPF reiterates that transport issues should be considered from the earliest stage of plan-making and development proposals, to ensure that impacts are recognised and addressed. In relation to transport, according to the government, the problem is that:

“At present, planning for travel too often follows a simplistic ‘predict and provide’ pattern, with insufficient regard for the quality of places being created or whether the transport infrastructure which is planned is fully justified. Challenging the default assumption of automatic traffic growth, where places are designed for a ‘worst case’ peak hour scenario, can drive better outcomes for residents and the environment. It means working with residents, local planning authorities and developers to set a vision for how we want places to be and designing the transport and behavioural interventions to help us achieve this vision. This approach is known as ‘vision-led’ transport planning and, unlike the traditional ‘predict and provide’ approach, it focuses on the outcomes desired, and planning for achieving them”.

To support this approach, amendments to two key paragraphs in the NPPF are proposed, summarised below (MHCLG has also provided a useful side-by-side comparison³). The key changes highlighted are 1) the emphasis on a vision-led approach; and 2) when development should be refused on highways grounds.

³ [NPPF December 2023 \(25\).pdf → national-planning-policy-framework-draft-text-f... - Draftable](#)

Considering development proposals

443.112. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) ~~appropriate opportunities~~ **A vision led approach** to ~~promote~~ promoting sustainable transport modes can be ~~— or have been — taken up,~~ given is taken, taking account of the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree **through a vision led approach.**

444.113. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, **in all tested scenarios.**

The government proposed reforms also state that *“To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect”*. This would mean that new guidance on transport assessments would need to be prepared, consulted on, and made available within a very short period of just a few months. On their own the proposed reforms to the NPPF wording are unlikely to materially change the approach towards transport, it is the promised guidance that holds the power.

- **The TPS is concerned that, given the importance of new Transport Assessment guidance in the context of a completely new way of working for the sector, sufficient time is taken to ensure that it is fit for purpose and that views from the wide range of stakeholders that will need to use this document are sought to ensure that it works effectively in practice.**

The wording used in the consultation draft is currently vague, in particular in respect to paragraph 113 where the use of ‘in ALL tested scenarios’ has raised some particular concerns, especially amongst local authority members of the Society. There will, after all, always likely be some hypothetical scenario where there would not be a severe effect on the highway network because the sustainable transport strategy is assumed to be so effective that there is plenty of capacity for any residual traffic from development. The guidance will therefore need to be alive to this and ensure that there is no potential to ‘game’ the system, being clear on how the scenarios are decided and who ultimately decides their credibility.

Key to effective guidance will be clarity of the policy objective. For example, is the government’s objective to create housing developments that would not have a severe traffic impact on key tested scenarios? What if the local government’s objective is to deliver a highway to bypass a local town and requires a contribution from a housing developer to fund this? Defining the new scenarios that should be tested will require considered thinking about the potential unintended consequences or tactics that may be legally deployed by some actors to circumnavigate intended objectives – the new guidance must address this point in particular.

- **Provide clarity on the scenarios that must be tested for different types of development; how they should be developed; who decides their acceptability and under what criteria.**

It is also noted that the current proposed wording requires a vision-led approach to ‘promoting’ sustainable transport modes. This wording only encourages support for sustainable transport modes but does not require development to be based on optimising access by sustainable transport, or achieving a minimum mode split for sustainable modes.

- **Revise wording to reduce ambiguity and clearly emphasise the need for vision-led transport to optimise access by sustainable transport modes.**

Equally, the word “only” remains in (current) paragraph 115 (consultation draft paragraph 113). At present this wording is used to argue that an application in an unsustainable location, or providing no sustainable transport connectivity, cannot be shown to have an unacceptable impact on highway safety or severe impact on the road network, and therefore cannot be refused. The continued inclusion of this word undermines the intent of this policy amendment and indeed the broad thrust of the rest of section 9 of the framework.

The wording should be further reinforced to clarify that development should be refused on transport grounds if it creates unacceptable safety concerns, not simply an unacceptable impact on ‘highway safety’.

- **Delete the word “only” from the current paragraph (consultation draft paragraph 113). Remove ‘impact on highway safety’ and replace it with ‘safety concerns’ (consultation draft paragraph 113).**

It is noted that paragraph 113 relates to the impact on the road network and the need to test the severity of this impact. This requirement encourages a predict and provide approach where the optimum capacity of local highway infrastructure is used as a proxy for allowable traffic generation. This in itself misses the point of adopting vision-led transport planning which is intended to take account of the opportunity to optimise access by sustainable transport modes. A more thorough rewrite of this paragraph is recommended to address this, as suggested below.

- **Change paragraph 113 (consultation draft) to: “*Development should be prevented or refused on transport grounds if there would be unacceptable safety concerns, or over-reliance on vehicular access and/or failure to optimise access by sustainable transport modes, tested in accordance with key scenarios as defined by the DfT.*”**

Signalling the requirement to adopt a vision-led approach to transport planning will not significantly change the status quo. Most transport consultants will claim that they already adopt an approach in accordance with vision-led, or alternatively “monitor and manage”, “vision and validate”, “decide and provide”, or “triple-access planning”. National Highways also claim that their RIS schemes are vision-led as they don’t fully cater for all predicted traffic in the scheme design period.

To date, by this definition, there is a lack of evidence to suggest that a move towards vision-led transport planning has fundamentally reduced car dependency. Whilst there are examples, such as Poundbury in Dorset, where there have been much-documented improvements in the quality of place, evidence suggests that levels of car dependency have been much the same using vision-led approaches.

It is a concern that there is much confusion about the terminology used and what is intended by its use, and once again the guidance should attempt to address this and provide clarity.

Members have also noted that there is limited mention in this documentation of the important role of parking policy in delivering the vision and we'd draw attention to the [TPS' Parking Policy Principles](#) released earlier this year which included several detailed recommendations on how planning for parking effectively can deliver wider strategic outcomes.

- **Publish an unambiguous definition of 'vision-led' transport planning and its clearly stated objectives.**
- **A vision-led approach to placemaking is different to a vision-led approach to access and this needs to be carefully articulated in future guidance.**

Vision-led approaches have always been required. Developers are already able to design housing around sustainable travel objectives. The challenge is that highway authorities generally remain unconvinced that this approach works for housing development and seek assurance that should the vision not be realised, there is a fall-back position where the traffic generated can be accommodated on the road network. Commonly, where a vision-led type approach is promoted, the local housing authority will require a comparable 'full fat' traffic assessment, and then the consultant shows what the 'vision' is expected to deliver.

- **Clearly state and call out the problems with the existing approaches to transport planning for development that the new approach intends to address.**

To overcome nervousness by the LHA that the vision-led approach won't work, the developer is often then required to commit to a financial fund that the LHA can draw down on at a later stage to upgrade the highway infrastructure. At this stage, the funding is effectively ring-fenced for highway improvements and in doing so this can undermine motivation to optimise efforts to deliver the vision - why spend the money influencing travel behaviour, if it doesn't work the developer will have to pay again for the highway improvements. Often more financial certainty can be obtained from agreeing on the highway improvements and minimising the sustainable transport measures. Unfortunately, 'monitor and manage' is code for "we'll have the highways anyway".

A key concern of local authorities (amongst both elected members and officers) is therefore scepticism that the vision-led transport strategy will meet its objectives and deliver a new development without unacceptable impacts on existing communities. Most therefore require additional highway-capacity backup as a plan B. The focus should however remain on getting the vision-led, plan A, right. Government must provide a clear policy direction that development accessed by sustainable travel modes is the expected default for planning applications.

- **New guidance should clearly state that any sanctions for non-delivery of the stated objectives of a vision-led approach must be related to delivering the agreed vision (ideally maximising sustainable access), rather than reverting to a highways-based approach.**
- **Issue clear guidance that rejects the use of historical traffic data to build a worse-case baseline from which development impacts are assessed.**

In the absence of clarification about what is meant by vision-led, any scheme that does not cater for all future predicted demand for traffic can be (and is) argued not to be 'predict and provide' and is therefore 'vision-led'. The way in which the National Network National Policy Statement (NNNPS) is currently worded provides an opportunity for National Highways to argue for a need to pay for an increase in highway capacity to remove holding objections on housing development, regardless of the view of the local highway authority. Making vision-led transport planning work effectively will require further revisions to the NNNPS otherwise it will undermine attempts to clarify the approach through new guidance.

The proposed NPPF changes alone will not address the core issue identified by the government of ‘designing new places defensively around worst-case highway assumptions’. The government needs to unpack this, to understand in detail where this has been an issue, to develop a deeper understanding of where it matters and how to fix it.

There may be optimism from the government that there are shortcuts to providing new guidance by building on work by TRICS, the Fixing Transport Assessments Working Group, Transport Planning Society, and the University of the West of England. Oxfordshire County Council has adopted transport assessment (TA) guidelines consistent with a vision-led approach, based on the TRICS ‘decide and provide’ guidance and it is understood that Somerset County Council are trialling. The University of the West of England has published its suggestions for a ‘triple-access’ approach. Despite the availability of this guidance, there is little evidence to support a shift towards adoption and concern has been repeatedly expressed by TPS members that those Local Highway Authorities with clarified TA guidance do not always apply it robustly in practice, given the risk of deviating from the status quo.

- **Analyse results from those developments that have applied approaches in line with the intended ‘vision-led’ approach and identify opportunities and issues experienced for further dissemination.**

A ‘Fixing TA Working Group’ supported by TPS set out its recommendations for TA reform to the DfT on 24 July 2024. The group emphasises⁴ that *“The current process is broken. All too often it enables car dependent developments that take us further and further away from our national ambition for low carbon, healthy developments where people want to live and work.”* The group stated that:

“Whilst there is significant interest among local authorities in new Vision Led transport assessment approaches, with some already adopting/seeking to adopt their own guidance, far broader changes to TA guidance and related policy (NPPF) and guidance (PPG) are required to meet our policy goals. Without national guidance, this change in approach will be slow at best; but more likely, uncertainty around planning inspector support, programmes, local growth, and tight budgets will ‘water down’ or prevent change.”

Many Highway Authorities refer to the need for a TA⁵ but don’t publish their own TA guidelines or direct people to a version. It is interesting to note that, unlike Oxfordshire, Hampshire has resisted producing its own TA guidance to help prevent it from being forced to ‘enable car dependent developments’.

It will be essential that the DfT engages with experienced transport professionals who understand the practicalities of delivering housing and development. Deciding on what vision for development is appropriate is a value-laden judgement that may vary widely and is prone to local political influence. This provides challenges to ensure compliance. The TPS stands by to assist.

- **To inform the new guidance, it would be beneficial to engage closely with a representative group of highway authorities to understand why they do not consider that they are currently empowered to deliver the types of development their stated policies clearly aspire to.**

⁴ Fixing Transport Assessments, Phase 2 recommendations for submission to DfT and MHCLG, Fixing Transport Assessment National Working Group, 24 July 2024.

⁵ [Information for highways developers | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/information-for-highways-developers)

There have been previous attempts to ensure that travel plans were developed implemented and monitored to a consistent standard through the creation of Publicly Available Specification (PAS) 500⁶ sponsored by Transport for London. This level of detail is crucial to ensure that the travel plans deliver on their laudable ambitions, and a lack of confidence in travel plans to deliver the travel mode-shift that has facilitated a reversion back to a more predictable highways-led approach.

- **Travel Plans are a key part of a vision-led approach and the new guidance should explain clearly their intended function and what they should contain.**

The government should be clear on its intentions regarding an integrated National Transport strategy, as proposed in the Labour Party manifesto. Instead of the development of that National Transport Strategy, the proposed new TA guidance could start setting in place the framework for what might constitute appropriate parameters for a vision, for example by reiterating targets for mode shift within Gear Change and in the Labour Party's rail policy document "Getting Britain Moving" and in relation to achieving objectives of the Transport Decarbonisation Plan etc. TPS are ideally placed to advise on the development of these parameters which should ideally be in place before changes to the NPPF become live.

- **Produce parameters for vision-led transport in terms of aspirational mode-use targets for different geographies.**

In two-tier authorities, the transport aspects of a planning application are dealt with by the County-level highway authority, whilst the planning aspects are dealt with by the District. This often creates a disconnect between the placemaking objectives of the planning authority and the movement objectives of the highways (note highways, not sustainable transport) authority. The officers dealing with transport often tend to have a highway background, and changing this organisational culture will take time to filter through.

- **Commit to running a series of training workshops and the provision of independent technical support to assist in the re-training of professionals working in development management /planning in the public sector.**

There is a myriad of practical issues to consider when evaluating the access options for new development which have been unpacked by TPS in collaboration with the Chartered Institute of Highways and Transport (CIHT) and the Royal Town Planning Institute (RTPI) – Delivering sustainable transport for housing developments: Fixing a failing planning and transport system⁷. Whilst every development will be able to connect relatively easily with the road network, connecting to a cycle or bus network is often more complex and challenging to agree by condition. Government guidance on the use of planning conditions⁸ states that they should be kept to a minimum, and only used where they satisfy the following tests:

1. necessary;
2. relevant to planning;
3. relevant to the development to be permitted;
4. enforceable;
5. precise; and

⁶ National specification for workplace travel plans, Publicly Available Specification 500: 2008.

⁷ [fixing-a-failing-planning-and-transport-system.pdf \(ciht.org.uk\)](#)

⁸ [Use of planning conditions - GOV.UK \(www.gov.uk\)](#)

6. reasonable in all other respects.

These are referred to in this guidance as the 6 tests, and each of them needs to be satisfied for each condition that an authority intends to apply. There is significant ambiguity around these tests that have been refined through case law over many years. The new guidance will need to consider where past case precedents cited have facilitated highways-led development and provide clarification on how the new policy should be interpreted in relation to appropriate Unilateral Undertakings, Section 106 Agreements and the Community Infrastructure Levy, in relation to planning obligations. Many vision-led transport strategies may fail on the 6 tests, particularly with regard to consideration as to whether they are enforceable, precise and reasonable.

- **Government guidance on the use of planning conditions should be revised to re-set case precedent and clarify how key elements of a vision-led strategy should be enforced and what interventions are considered reasonable, relevant and necessary.**

Concluding thoughts on wider implications of a move to vision-led planning

This is a fantastic window of opportunity for this government to be the engine for genuine change in transport planning. TPS is acutely aware that this window will close quickly, and success will depend on who advises the government. In interpreting the implications for vision-led planning, it is crucial that MHCLG and DfT are themselves 'vision-led' and have the remit to listen and shape the approach. To achieve their housing objective government needs independent, practical advice based on pragmatic experience of what works, unbiased by corporate business needs. It is obvious that tinkering at the margins won't help in developing the new TA guidance, ambiguity is the enemy, and radical reform is needed based on pragmatism and experience.

Reform to transport planning for housing has the potential to create other challenges. Many local authorities have become reliant on developer funding to pay for infrastructure investments, or even just road maintenance. If this funding stream dries up, the funding pressure will re-emerge elsewhere. If TA for housing is done in a way that reduces car dependency, then the traffic predictions in NETM will be considerably lower, as that is the intention after all. If NETM data is changed then the business case for all major road schemes will be affected, and for schemes barely clinging on to a viable business case, such changes may signal a need to move away from (or at least significantly rethink) many of the highway expansion projects currently under active consideration.

The government has a choice. If it implements the TA guidance required to expedite stated policy intentions, then the potential impact of this guidance could be seismic. If it succumbs to compromise, then the so-called planning reforms will amount to little but hype. Whatever it chooses, it won't get the guidance right the first time and, like the last Labour government, in due course, it will likely come under pressure to relax the rules.

TPS urges the government to genuinely commit for its full term of office to delivering better places to live, that are accessible by sustainable travel, have healthier streets, more inclusive societies, and affordable homes. These initial changes to guidance must signal the start of a new paradigm in transport planning, not yet another false start.

Vision-led transport planning is not simply about a new guidance document, it requires a change of organisational culture across government. A government culture that is vision-led and seeks to find every opportunity to reduce costly and time-consuming processes, to deliver the sustainable transport infrastructure that is desperately required. One that does not accept claims that 'no one will cycle around here' and instead puts the structures and processes in place to make cycling and

active travel generally the most attractive mode of travel. One that does not accept that ‘public transport won’t work around here’ to one that understands how to create the right environment for viable, inclusive and affordable access to jobs and amenities without the need to own a car.

- **Commission pilots to help formulate learning and best practice.**
- **Ensure that the selection of ‘New Towns’ builds on the pioneering work undertaken by Create Streets and Sustrans⁹ to optimise accessibility by sustainable modes.**

Crucially, we need to ensure we don’t continue to overplay our reliance on policy and guidance. In the absence of cultural change, any amendments will become subtly eroded as they have in the past. TPS urges DfT to provide stronger leadership in transport planning. Delivering on housing in the longer term will require major reform of local government highways and planning silos. The best time to start is now.

Certainty will help developers bring forward housing. Integrating with a transport network is complex and requires many different government departments and agencies, companies and other stakeholders to collaborate effectively. This can be like herding cats and take considerable time and effort. Often, the simplest solution is to provide a highway link and some funding towards future infrastructure aspirations. Vision-led transport planning is more complex than highways-led. It will require more resources and collaboration, combined with a renewed passion and commitment to do things differently. Where this works visions can be delivered, but too often it requires the right people at the right time. Success is variable and for every good case study, there are many reports of frustration and disillusionment. Delivering vision-led housing effectively will need an injection of resources into local authorities and regional bodies. They will need the people to coordinate, guide and deliver local or regional transport needed to support the housing.

Many Local Plans will need to be rewritten however it is unclear what the requirements are to rewrite based on a vision-led approach to transport and this needs urgently to be clarified. Many Local Plans are based on housing provision predominately accessible by highways. Vision-led transport planning is not, and must not be a sticking plaster for a poorly accessible location. If a local authority has a democratically approved Local Plan that has decided to build housing away from jobs, surely the transport strategy must ensure that people can physically access the jobs and most often this is more efficiently done by car. Is this an acceptable ‘vision’ or should car-dependent Local Plans be rewritten?

- **Guidance is required on implications for existing local plans from a move to a vision-led system.**

A Local Plan is developed by the Planning Authority and tested through Examination in Public (EiP) with a Planning Inspector over many months into years; the same is not true of a Local Transport Plan, which is typically developed by the Local Highway Authority and subject to local consultation only. Local Transport Plan (LTP) guidance is long overdue and should be reviewed to consider how the ‘vision-led approach’ is intended to be applied to LTPs and be compliant with the EiP approach to Local Plans. The DfT guidance on Local Transport Plans has already been delayed by years. There is now an opportunity to merge the LTP and LP processes to establish consistency and a complementarity of approach.

- **Government should commit to a date on when it will publish updated guidance on Local Transport Plans reflecting the adoption of vision-led and its relationship with Local Plans.**

⁹ [Road to Nowhere Indesign \[01.03.24\].indd \(sustrans.org.uk\)](#)

TPS Response Question 23 - thoughts on Grey-belt

Greenfield and the proposed grey-belt sites are often typified by low-density housing and high car mode share. It is an obvious concern that planning policy may identify much grey belt (and therefore development) in unconnected, unsustainable locations. Land nearer towns and cities is more likely to have access to public transport and local services and it is also likely to score higher on the current green belt purposes tests. If grey belt can only be land with limited contribution to these purposes this means the land near built up areas cannot be grey. The rationale needs careful articulation to understand its compatibility with an aspiration to grow sustainable transport mode share – ideally, the definition of grey-belt should include adequate provision for sustainable access, perhaps linked to output from the DfT’s developing connectivity tool.

- **Ensure that grey belt land releases conform to a sustainable transport access requirement.**

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