

Response to the Levelling-up and Regeneration Bill: reforms to national planning policy

Introduction

The views expressed below are those of the Transport Planning Society (TPS), Chartered Institution of Highways and Transportation (CIHT), Transport for New Homes (TfNH), Sustrans, Living Streets and CPRE the countryside charity, in respect of the planning and transport elements of the National Planning Policy Framework (NPPF).

We are pleased to comment on the proposals for reviewing the national planning policies. As required, we have answered specific questions, but there are some critical issues not covered by them, so as such, have set them out below.

We strongly support the need to review the NPPF and believe that this is urgent. The current draft NPPF, published alongside the consultation's questions, does not yet cover many acute issues. The recently published timeline for changes to the NPPF reinforces this concern. We have separately made a limited number of suggested changes to the draft NPPF to reflect those aspects we believe require urgent change to reflect critical aspects of delivery.

The following factors underpin this concern for urgency:

- the speed of climate change;
- the failure to decarbonise transport so far given the car-focused nature of most new developments;
- the time change takes to have a real impact and for people/professionals to change behaviour;
- the increasing impact of badly located new development for whom car travel is the only option;
- the consequential impact on the viability of public transport;
- the lack of new development facilitating walking, wheeling, cycling, or taking public transport to local daily, or weekly services;
- both Local Transport Plans (LTPs) and some Local Plans (LPs) will be going through the system during this delay and it is a lost opportunity to be able to reflect the above issues.

The CIHT/TPS/RTPI have undertaken a number of pieces of work over the last few years^{1 2} ([Appendix](#)) which set out our concerns and suggestions for changes and improvements to the NPPF and other related documents. These are still pertinent to this consultation. They focus on how far the national planning policies are or can achieve Government policy. As evidenced through them, and research undertaken by

¹ [Better planning, better transport, better places, CIHT, \(2019\)](#)

² [Fixing a failing planning and transport system, p.5, CIHT, \(2022\)](#)

RTPI (Royal Town Planning Institute)³ and Transport for New Homes ⁴, as the NPPF stands, and even as proposed in the new draft NPPF, it has not - and cannot achieve - the Government's objectives.

The first 3 chapters of this consultation response set the scene and scope of the further revision of NPPF. **We believe they need strengthening to meet current concerns with the NPPF so it can achieve the Government's objectives.** Given that the listed questions do not start until chapter 3 and do not deal with the wider context we set out a few key suggestions below which support the Government's agenda prior to our responses to the questions:

Chapter 1: This should include a link to climate change and decarbonisation as it is setting the key context for change. Paragraphs 1 and 2 provide the starting point but no mention of climate change is explicit. Reference is made to "right homes in the right places with the right infrastructure" but nothing about how this is to be defined, or its relationship to decarbonisation etc. or how a place functions to support the local economy which is as relevant as full of "beautiful" houses. Adding the word "infrastructure" is good but it does not cover much of sustainable transport. The use of the term "accessibility" is key and as important as "beauty, energy, habitats and biodiversity" all of which are mentioned.

Chapter 2: This is critical in respect of Government policy objectives, so climate change, accessibility, and equity are important and need to be mentioned. A separate policy objective is required, as none of paragraphs 3, 5 or 7 are effective in dealing with location, sustainable transport or accessibility as drafted, although we are pleased that "infrastructure" is mentioned.

Chapter 3: Paragraph 1 should also reference transport/sustainable transport or accessibility as we believe that this requirement needs reinforcing wherever possible, in the same way as the positive requirement for "beauty and placemaking".

Chapter 4: In paragraph 1 there is no reference to accessibility, climate change, or carbon which would be positive. Paragraph 2 mentions infrastructure but could be clearer in respect of what is meant by the "right place" in the context of sustainable transport and carbon. A caveat inserted at the end of the paragraph might help.

It is positive that mention is made of the views of stakeholders in respect of housing and methodologies in paragraph 4, similar equivalent comments are made about the location of housing and how it is driving unsustainable behaviour. Reference could be made to the forthcoming Quantified Carbon Calculator and the new transport accessibility tool which should be in operation by the time this further draft NPPF is published. Referencing the LTPs (Local Transport Plans) in the context of delivering the "sustainable pattern of development" should be mentioned. Paragraph 15 on the Duty to Cooperate and the proposals is of concern. As drafted, it does not address the need to cooperate with transport service operators and adjacent authorities. To ensure the integration of planning and transport in terms of choice of location and servicing of

³ [NET ZERO TRANSPORT: The role of spatial planning and place-based solutions, RTPI, \(2021\)](#)

⁴ [Transport for New Homes \(2018\); Transport for New Homes \(2022\)](#)

sites, addressing carbon, accessibility, and links to the LTPs (Local Transport Plans) plus transport networks cooperation and partnership working is critical.

Chapter 5: Paragraph 1 makes clear the importance of housing/ homes in this next version of the NPPF but no reference to places or access to services which are affordable and sustainable. Stressing the value given to transport and its importance to peoples' independence, health, affordability as well as the local economy would chime with Government objectives.

Chapter 7: Paragraph 1 is clear about the importance of climate change and decarbonisation as part of the objectives of planning so it would strengthen this message if included from the beginning rather than left to Chapter 7. Paragraph 2 could also be strengthened by including reference to the Decarbonisation of Transport Strategy, the LTPs (Local Transport Plans) and any other transport aspects when referencing other government policies. It is good to see reference to sustainable transport in paragraph 3 but earlier and clearer referencing to QCC, LTPG etc. would strengthen this and emphasising past problems to be addressed, as other chapters have done e.g., references to biodiversity and nature recovery strategies as well as food supply/energy. The reference to quantifying carbon in paragraph 12 refers to, or appears to refer to, a separate and different methodology to that being developed by the Department for Transport: they need to be linked and complementary, so no duplication or conflict occurs.

Chapter 9: Given the timeframe outlined in this chapter it reinforces our concern about the lack of critical changes in the current draft NPPF for the reasons given above.

Chapter 10: We support the idea of NDP in principle but accessibility levels, and carbon reduction, should be included in the NDM policies as should the need for integration of LTPs. In addition, current and future proposed transport networks need to be integrated into decision-making to ensure "the right locations" of new development in the context of reducing carbon and travel by private vehicle etc.

Chapter 11: As drafted, this chapter does not acknowledge the role of transport in achieving the levelling up agenda in the introductory paragraphs. The TPS has produced a research report State of the Nation Report and subsequently updated it which are relevant here ^{5 6}.

Chapter 12: It is good to see reference to sustainable transport here. The reference to place-making should be wider to include functionality as well as "looks". The Plan-making reference also needs to ensure it picks up transport and reference to transport bodies. We suggest a change to the chapter order so that the chapter on sustainable transport comes earlier given its underpinning role to sustainability, climate change, health, equity, and economic viability. A link to the LTP (Local Transport Plans) should be mandatory: we need accessibility measures that are used to determine development locations and clear multi-modal transport network plans for the whole life of the Plan.

⁵ [State of the Nations: Transport Planning for a sustainable future, TPS, \(2020\)](#)

⁶ [State of the Nations Update: Transport Planning for a sustainable future, TPS, \(2022\)](#)

Chapter 13: Glad there is reference to common data standards. This needs to be across the transport and climate/carbon field as well.

Answers to the consultation's specific questions:

Q1: No comment

Q2: No comment

Q3: No comment

Q4: No comment

Q5: Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

We agree that the importance of the Neighbourhood Plan, if approved, should be recognised but not only in the context of housing but also any references to accessibility or transport to ensure new development has sustainable transport access from the outset.

Q6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

We believe the opening chapters of the Framework should not only be clearer about the importance of planning in respect of homes and other development, but it should also make explicit from the beginning the following:

- the key role of planning in tackling climate change, reducing carbon and improving health and wellbeing;
- its critical role in ensuring both new and existing development are located, and designed to ensure that there is an effective choice of accessing sustainable transport to services;
- that the planning of sustainable transport provision is integral to the planning processes both at the local plan stage and for all development.

Q7: No comment

Q8: No comment

Q.9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply maybe taken into account?

We want to highlight here that any significant change that allows for lower density has the potential to compound challenges already faced in delivery. For example, this steer could hamper the effort to deliver adequate housing numbers by producing low-density urban extensions or 'cowpat' housing developments on greenfield sites. Not only does this type of development contribute to poor delivery of housing, but it also presents a major barrier to sustainable transport orientated development where it is easier to walk, wheel, cycle and use public transport, which

in turn supports local business and promotes walkable communities. By doing this it further embeds car-led development and fails to decouple road building from new development, being at odds with the Transport Decarbonisation Plan ⁷, as well as the recently updated DfT Circular 01/2022 ⁸.

Q.10: Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

Local authorities should also consider their wider vision and aspirations in respect of sustainable transport and ensure that such provision is supported and not compromised. This should be based on the evidence in the Local Transport Plan so the same evidence base is used.

Q11: No comment

Q12: No comment

Q13: Do you agree that we should make a change to the Framework on the application of the urban uplift?

We support the proposal to ensure that this policy focuses on supporting sustainable patterns of development and reducing the need to travel.

Q.14: What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Integrating the planning of transport networks with the Local Plan preparation would greatly enhance the ability of authorities to maximise the potential of sustainably located development, i.e., being accessible by active travel and public transport, and minimise development in inaccessible places. Using the same evidence base including a transport appraisal of the Local Plan within the environmental assessment would also ensure consistency and cohesion.

Better bus provision requires the integration of land use planning and transport. CIHT and TPS firmly believes that buses have a significant role to play in providing sustainable connectivity.

Paragraph 114 of the NPPF states the aim of *'so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use'*

CIHT's Buses in Urban Developments ⁹ notes that the layout of streets and paths in new developments should facilitate direct and efficient bus operation, with direct and pleasant walking routes to bus stops.

We propose that the following addition is made to Para 114 of the next version

⁷ [Decarbonising Transport: A Better, Greener Britain, DfT \(2021\)](#)

⁸ [Department for Transport Circular 01/2022](#)

⁹ [Buses in Urban Developments, CIHT, \(2018\)](#)

of the NPPF as follows:

New developments and regeneration schemes should be located where they can be served by extensions to existing bus services or where new services can provide direct and fast routes to the town centre and other major destinations. Once a development location has been decided, the outline street layout should be planned to allow direct and fast bus services that are both efficient for the operator and attractive to passengers. The local bus operator should be involved in the initial layout of streets and positioning of bus stops in a new development.

For this reference, we would encourage the revised NPPF to signpost to CIHT's Buses in Urban Developments. This would be beneficial as Buses in Urban Developments provides further information on how bus provision can be effectively accommodated into developments.

Q.15: How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

For effective spatial and transport planning, there must be coordination between relevant local authorities and other key bodies (such as sub-national transport bodies) throughout the plan making and delivery process. An effective on-going mechanism needs to be established, as referenced in our previous publication, to facilitate this to ensure the integration of the wider economic, transport and housing market¹⁰.

Q16: No comment

Q17: No comment

Q18: No comment

Q19: No comment

Q20: No comment

Q21: No comment

Q22: No comment

Q23: No comment

Q24: No comment

Q25: No comment

Q26: No comment

Q27: No comment

Q28: No comment

Q29: No comment

Q30: No comment

Q.31: No comment

Q.32: No comment

¹⁰[Better planning, better transport, better places, CIHT, \(2019\)](#)

Q.33: Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

It will be important to ensure in this context that “beauty and placemaking” ensures not only that buildings and places “look good” but that they also function effectively and are “fit for purpose”. The functionality of a place needs to ensure that people can easily access services and facilities using sustainable transport – active travel and public transport - and that the place has a suitable range of services for its size. It is critical that, in order for places to be deemed ‘beautiful’ or ‘well-designed’, they must actively ensure that sustainable transport provision is well catered for and properly integrated.

Q.35: Do you agree greater visual clarity on design requirements set in planning conditions should be encouraged to support effective enforcement action?

We broadly agree with the concept that local authorities should have greater visual clarity to ensure well-designed and beautiful places are delivered and to refuse those who do not meet such standards.

However, we also believe that if a scheme can be refused on not being ‘beautiful’ then local authorities should also have greater power to refuse a scheme that does not prioritise sustainable transport modes. CIHT members, along with the Transport Planning Society (TPS) and Royal Town Planning Institute (RTPI) members, outlined in the publication, *Fixing a failing a Planning and Transport System*, following a survey of all members that: ***“Local Planning Authorities should prioritise development that caters for sustainable transport as a natural first choice. We must see a move away from car-centric development and towards creating quality places that promote growth.”***¹¹

Therefore, we would like to see support being offered to local authorities to enable car-led development to be refused, not only due to it compounding the growing climate and health crises, but also due to it contributing to ‘ugly’ development.

Q.36 No comment

Q37: No comment

Q38: No comment

Q.39: What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

We support the need for carbon assessment to be embedded in planning policy. This is crucial for many reasons, not least the impact development can have on

¹¹ [Fixing a failing planning and transport system, p.5, CIHT, \(2022\)](#)

individuals' transport choices, and as such, on the climate. We are aware of several carbon calculator tools already in existence, but they need to be given greater weight in the decision-making process, including the full carbon cost of vehicles (including Electric and Hydrogen Vehicles). The Department of Transport is currently devising a quantified carbon measure and we believe this should be supported by the revised NPPF through clear referencing and a requirement for it to be used as part of a transport assessment of the Local Plan and any proposed development. Implementing and utilising these tools should be seen as a priority.

A key outcome of strategic planning will be to align infrastructure with spatial planning. This is especially critical in the context of achieving net zero carbon transport, where radical change is needed to reduce travel demand, maximise accessibility by sustainable modes of transport, and facilitate the use of alternative fuels. The scale of the challenge is considerable: research by the RTP1¹² clearly shows that most areas of England will struggle to reduce transport emissions at the scale and pace required *even if all* new development is car-free, strict traffic removal policies are in place, and the shift to electric vehicles and grid decarbonisation proceeds at speed. In addition, over **90%** of members surveyed from the three institutions in 'Fixing a failing planning and transport system' agreed that the relationship between planning and transport in achieving net zero is important.¹³

To deliver the government's current ambition of 300,000 new homes per year by the mid-2020s requires very close integration with transport planning. Patterns of development will need to secure the very highest levels of accessibility by sustainable modes, and exploit opportunities to improve connectivity between different modes including through local and strategic mobility hubs. This means that all new development will need to be located and designed to take advantage of the very highest levels of service by walking, wheeling, cycling and public transport modes, to ensure that sustainable travel choices are viable and the preferred choice for the widest range of journeys. Significant developments must be designed and located to ensure that the majority of trips, especially at peak times, can be serviced by sustainable modes which are credibly more attractive than the private car and support a substantial reduction in private car ownership.

Transport providers will therefore need to be engaged in the strategic planning process to assess and validate different spatial strategies and continue this through local plan-making to de-risk the delivery allocations. They should also be part of the collaborative delivery body suggested in the publication, *Better planning, better transport, better places*¹⁴.

Q.40 No comment

Q.41 No comment

Q.42: No comment

Q.43: No comment

Q.44: No comment

Q.45: No comment

Q.46: No comment

Q.47: No comment

Q.48: No comment

¹² [NET ZERO TRANSPORT: The role of spatial planning and place-based solutions, RTP1, \(2021\)](#)

¹³ [Fixing a failing planning and transport system, p.10, CIHT, \(2022\)](#)

¹⁴ [Better planning, better transport, better places, CIHT, \(2019\)](#)

Q.49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

We agree with the benefit of statutory National Development Management Policies, but we believe they should have a wider scope. Given the crucial role of planning and placemaking to the Government's wider agendas on climate change, decarbonisation of transport and enhancing peoples' opportunities to improve their health and wellbeing through being more active, we believe these aspects should become part of the NDMPs (National Development Management Policies). The NDMPs should include policies for ensuring all new development is based on reducing carbon, ensure highway safety, facilitating access for all by sustainable transport means as a preferred /easy choice e.g., by including an accessibility index, and they take full account of the Local Transport Plan in terms of networks and funding.

Chapter 10, paragraph 3 of the consultation states: 'These would be given the same weight in certain planning decisions as policies in local plans, neighbourhood plans and other statutory plans (and could, where relevant, also be a material consideration in some other planning decisions, such as those on Nationally Significant Infrastructure Projects)'. This should not prevent ambitious Local Authorities from going beyond targets set in local plans or NDMPs: they should actively be encouraged to do so.

Q.50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

See above – decarbonisation, climate change, resilience, health, and wellbeing in as far as it is relevant to placemaking and sustainable transport/accessibility.

Q51: Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Yes.

Q.52: Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

We would like to see a policy explicitly encouraging or supporting local living and walkable neighbourhoods included as a National Development Management Policy. The rationale for this is set out below.

Connected and compact communities, where people can meet the majority of their daily needs within a reasonable distance of their home by walking, wheeling, cycling, or using public transport, can be shaped by broad spatial planning principles across all or most of England. A national policy setting out these principles would ensure that new and existing communities are delivered to bring together homes, jobs and key local infrastructure including schools, childcare and lifelong learning opportunities, community centres, local shops, greenspaces including community gardens and food growing, playgrounds and informal play opportunities, health and social care, sport

and recreation, local public transport, and safe, high-quality walking, wheeling, and cycling networks.

Such a network of high-quality, accessible, mixed-use communities and neighbourhoods will help deliver four of the government's levelling up missions across England on health, wellbeing, pride in place and public transport.

The 20-minute neighbourhood concept, together with the broad spatial planning principles underpinning this, is increasingly being adopted by local authorities in England. According to the Sustrans-commissioned Walking and Cycling Index (WACI) survey in 2021, 79% of residents support the creation of more 20-minute neighbourhoods.¹⁵

In practical terms, giving more priority and clarity to proximity within plan making and site allocation would help to deliver connected and compact communities. This means embedding the importance of walkable proximity into national policy and guidance, ensuring that accessibility standards are based on 800m (shown by the National Travel Survey and further research by Barton, Horswell and Millar in 2012 to be the general distance people are willing to walk to meet their daily needs) walking distance to key services and 400m to bus stops.

According to recent research published by Sustrans on [Walkable Neighbourhoods](#)¹⁶, the distance from a service over which a site would be classified as 'poor' or 'unacceptable' ranges from 240m to 5km between local authorities. Furthermore, in almost half of settings, local planning authorities use 'as the crow flies' distance rather than road distance, meaning that true distances could be considerably higher. If the Department provided a digital tool to support LPAs to measure proximity, this would enable them to incorporate proximity as a determining factor in site allocation. This proximity should be measured whether a new development is within a settlement boundary. 20% of LPAs reported that they rarely reject sites that are deliverable, no matter what the assessment of proximity shows, while only 16% reported that proximity was a major reason for a site being discounted – this needs to change. 64% of planners cited 'lack of robust planning guidance or regulation' as an important barrier to using walkability within site allocation.

Housing density needs to be sufficient to ensure that local facilities and services including public transport are financially and socially viable. On page 14 of the Sustrans WACI survey in 2021 respondents reinforced this point¹⁷:

We would also like to see National Development Management policies on accessibility levels, carbon reduction and a requirement to link these assessments to the proposals being currently produced by the Department of Transport so that there is clear synergy between evidence, methodologies, and policies across these inter-related areas.

¹⁵ [Walking and Cycling Index, Sustrans, \(2021\)](#)

¹⁶ [Walkable neighbourhoods, Sustrans, \(2022\)](#)

¹⁷ See Sustrans survey 2021 for table.

Q.53: What, if any, planning policies do you think could be included in a new Framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

Planning policies and the Infrastructure Development Plan should be consistent and integrated with the national, regional, and local transport plans and proposals so that they reinforce each other thereby supporting levelling up. Transport underpins economic as well as social and environmental conditions so, as has been recognised by Government¹⁸, it is one of the key pillars to levelling-up.

Q.54: How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?

Economic growth and productivity are a priority for all parts of the UK (United Kingdom) to ensure that the country remains prosperous and future proofs its contributions. However, there must be a sustainable route to growth. The challenge of achieving net zero by 2050 and levelling up go hand-in-hand. Therefore, all opportunities should be explored as to how updates to the Framework can both support development and drive **low carbon** economic growth.

In order to do this, transport must be better integrated into the Framework to support development. Transport is a key pillar to Levelling Up the country, but a transport system that caters for the many, not the few, can provide a positive benefit for people and business, providing access to jobs, increasing productivity, supporting the growth of the economy, as well as unlocking new areas for development and providing the opportunity for innovation.

Levelling up is an opportunity to create better, more sustainable, connections to our market towns and rural communities. As well as delivering fast, reliable, and sustainable inter and inner-city transportation that is inclusive not exclusive.

As outlined in Better Planning, Better Transport, Better Places¹⁹, improving local highways, and fixing a failing planning and transport system, as well as failing transport systems and networks is essential to deliver the outcomes we need.

Therefore, for the Framework to be a better driver of **low carbon** economic growth and productivity in every part of the country, it must be better integrated with transport. This means clearly referencing other policy, such as: Manual for Streets, Gear Change, Local Cycling and Walking Infrastructure Plans, Bus Strategies, and Local Transport Plans within the Chapter 9, *Promoting Sustainable Transport*, of the NPPF. With transport being a key pillar of the levelling-up agenda, it is imperative that we see the Framework better integrated with it to support **low carbon** economic growth and productivity. In addition, spatial planning can deliver improved health and wellbeing which, in turn, can increase productivity.

¹⁸ [Levelling Up the United Kingdom, HM government, \(2022\)](#)

¹⁹ [Better planning, better transport, better places, CIHT, \(2019\)](#)

Q.55: Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Yes.

Q.56: Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

We agree that it is important that all vulnerable groups such as women and girls, those with a disability and older people should feel safe in public spaces and should be seen as a priority. Planning for equity should be at the heart of planning like sustainability.

Q.56: Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

In the light of our answer to Q55, the Framework and NDMPs should include the role of planning in terms of equity not only in terms of the examples given but all placemaking and transport.

Q.57: Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

It will be important for the Framework and the NDMPs to be accessed via several different means: digitally but also in hard copy. It will also be important for it to provide direct links to further national guidance and other key reference document, for example, Gear Change, the National Model Design Code and the yet to be published Manual for Streets update, which set out best practice.

A set of data standards for local plan evidence, planning constraint, planning application and appeal data should be developed. The RTP1 publication A Digital Planning Manifesto and the Digital Taskforce for Planning's publication A Digital Future for Planning: Spatial Planning Reimagined providing a theoretical framework for this.

In CIHT response to MHCLG (Ministry for Housing, Communities and Local Government) consultation on National Planning Policy Framework and National Model Design Code CIHT noted: 'A recent survey of CIHT members also indicated a strong desire for strengthening the Manual for Streets' position (76% of respondents said MfS (Manual for Streets) should be mandatory). This could be achieved through putting greater emphasis on Manual for Streets and the National Model Design Code in the National Planning Policy Framework or by making it

Statutory Guidance.²⁰

Q.58: We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

The recent publication by Sustrans, ‘Disabled Citizens’ Inquiry’²¹, outlined that 88% of disabled people say that a planning system which ensures more services people need are provided within walking or wheeling distance of where people live would be useful for them to walk or wheel more. Therefore, giving weight to proximity within a new NDMP (National Development Management Policies) is a good starting point, but, specifically, work needs to be done to understand and ensure how this works for disabled people. This should include ensuring amenities are within a walkable distance and duration (time) for disabled people. It should also be recognised that disabled people must often walk or wheel further to reach their destination because of direct routes being inaccessible.

Furthermore, many services and amenities are not fully accessible, and disabled people may not have the same choices in where to go. Finally, disabled people may also be likely to require access to specialised services, hence the importance of aligning walking and wheeling with public transport for longer journeys.

²⁰ [CIHT response to Ministry of Housing, Communities and Local Government’s Planning for the future consultation, \(2021\)](#)

²¹ [Disabled Citizens’ Inquiry, Sustrans, \(2023\)](#)

Appendix

Submission to DfT on proposed NPPF changes August 2022

The Integrating Planning & Transport Focus Group, a joint initiative of CIHT, TPS and RTP1, has been working for some time to identify the barriers which are preventing new development in England from being truly sustainable in transport terms.

The current NPPF is not fit for purpose and will not deliver the essential changes required to tackle the climate change emergency and decarbonisation. There is considerable evidence available to support this statement. Nor will it deliver the Government's levelling up, healthy people or healthy vibrant places agendas. Both planning and transport together must play a leading role in the climate emergency, as well as in response to the other drivers. A new strategic NPPF is crucial for this challenge: the current legislative changes and the NPPF Prospectus provide the ideal time for radical change.

The Group recently commissioned a survey of the views of practitioners across all three constituent organisations, of which there were over **3,500** written responses. 5 key themes were established, which confirmed there is a pressing need for substantial reform to national planning policy:

- **Location** – making sure that location of a development enables integration with public transport and active travel networks as a priority.
- The need for **robust & integrated policy and guidance** to deliver sustainable developments
- **Refuse Developments That Are Car-Centric** – Overreliance on the motor vehicle is detrimental to the environment, refuse applications for developments that give priority to the car.
- **Better Use of Funding** - funding needs to be used effectively to make sure that sustainable transport modes are catered for as the first choice for travel in new developments.
- **Skills and Experience** – enabling professionals to utilise their skills and experience to create sustainable developments effectively, and to improve

The new NPPF must align with the Transport Decarbonisation Plan, actively support its delivery, and have clear reference to approved Local Transport Plans. Given that transport is a derived activity driven by location, this is something that will be crucial. Therefore the NPPF needs to be a spatial plan as do local plans.

A clear and robust distinction between the strategic, spatial purpose of plans and generic (aspatial) development management policies, is a necessary but insufficient to achieving this transformation.

NPPF needs to set a clear starting objective that plans and development proposals must actively facilitate the transition to a net zero economy, especially patterns and modes of movement - as unlike any other activity these are inherently spatially derived and expressed. This has substantial implications for its spatial strategy formulation.

All the objectives and policies in the NPPF, as well as in the NDMP, must be coherent and consistent to continually reinforce the outcomes required and allow no loopholes. This is not the case with the current NPPF especially in the context of transport.

The cost of not achieving net zero will be far greater than any pain associated with a more robust NPPF and planning reforms. Enabling people to understand this situation will be essential.

Unsustainable developments have the potential to undermine the reductions in transport carbon emissions that are achieved by LTP policies (QCR) and transport schemes.

Key Issues to be addressed:

1.1 The style and role of the NPPF

The new NPPF should focus on the clear strategic objectives and policies required to be implemented across the country to deliver the above agenda at the pace required. It will need a more directional style especially in the context of location, transport, and the form transport to be provided. For rapid results in terms of carbon the more spatial it is the more effective it will be. It should be very ambitious given our current situation!

1.2 Vision

It should contain a clear vision for the country for the next 20 years linking the Government's economic, social and environmental agendas to place. In addition, the NPPF should establish the requirement for all local plans to have a vision which incorporates that in the LTP. The Local Plan or at national level the NPPF, is the only current opportunity to bring together economic, social and environmental requirements with PLACE.

1.3 Location and accessibility

Creating quality places for people and reducing carbon requires the co-location of people with key services so the NPPF should include requirements that drive this process through the local plan. Development proposals that are not accessible by sustainable transport should be refused.

The NPPF should also recognise that accessibility can be achieved in three ways, as set out in Professor Glenn Lyons' Triple Access Planning model²²: Digital Connectivity, Spatial Proximity, and Physical Mobility.

But these aspects need to be considered holistically and should not undermine or detract from the spatial nature of the planning and transport context and this essential element of planning.

1.4 Definition of Sustainable Transport

The current definition of sustainable transport in the NPPF is too open to interpretation. Zero, and ultra-low emission vehicles promote car use, and as such, induce demand on the road networks and road building as a result. This is not sustainable. Sustainable transport should therefore be defined as Active Travel and Public Transport.

1.5 Test of Reduction in Carbon Emissions

²² <https://www.tapforuncertainty.eu/>

The NPPF already recognises that the environmental objective of sustainability means moving to a low carbon economy (Para 8 c) and that sustainable patterns of development mitigate climate change (Para 11 a)). However, the NPPF fails to make sufficient links between transport and carbon emissions. Chapter 14, which sets out how the planning system supports the transition to a low carbon future, does not mention transport at all.

The NPPF must set the clear principle that developments which lead to an increase in transport-generated carbon should be refused. Therefore Para 111 must be removed from the NPPF.

1.6 Accessibility Assessments

Transport Assessments should be replaced with Accessibility Assessments. In the joint survey, 58% of respondents indicated that they faced issues with TA guidance in creating sustainable development. These should also relate to the forthcoming QCR methodology.

1.7 Strengthened Requirement for Sustainable Transport

The NPPF is too weak on requiring sustainable transport provision. Chapter 9 is entitled 'Promoting Sustainable Transport', which is inadequate. The NPPF only requires 'opportunities' to be taken and uses the phrase 'so far as is possible'. An applicant therefore only has to show there are no realistic opportunities for walking, cycling or public transport connectivity to satisfy the NPPF.

It is not sufficient to merely 'encourage' active travel and public transport (Paras 92 c), 112 a)). Active travel and public transport must be enabled by new developments – for example by providing on and off-site cycle facilities that are compliant with Local Transport Note 1/20.

1.5 Links with Local Transport Plans

The NPPF does not presently mention LTPs and this needs to be addressed. Other documents such as Local Cycling and Walking Infrastructure Plans are mentioned but these will be mandatory daughter documents to LTPs (alongside other key documents such as Decarbonisation Plans, Bus Service Improvement Plans and Rights of Way Improvement Plans). Making an explicit link to the LTP will reference all these key documents.

The link with the LTP should also enable a spatial local plan to be provided that demonstrates the current and proposed transport infrastructure during the life of the Local Plan covering all modes of transport and its relationship to current and proposed places.

The incorporation of the strategic transport routes across all modes at national level, both current and proposed, would similarly reinforce the importance of linking places, people and transport.

1.6 Car Parking

Car Parking is a key determinant of transport choice and excessive provision reduces density and makes compact developments that favour active travel less achievable. The NPPF should therefore support maximum car parking standards, rather than only accepting them in limited circumstances (para 108)

The advice (also Para 108) that convenient car parking should be provided in town centres is inappropriate and should be removed. Accessibility to town centres is critical, but not dependent on the provision of convenient car parking.

1.7 Co-ordination and collaboration

For both an effective NPPF and Local Plans they need to be based on robust evidence and developed throughout in collaboration with not only adjacent or higher tier authorities, but with transport service providers, other infrastructure providers, and with communities. The evidence base should cover carbon, health, deprivation, and transport as well as the standard planning information. Additionally, social value impacts should be looked at as well as overall quality of life. If a community wants to be competitive and successful in the future, then the quality of life associated with the place will be a key factor.

1.8 Infrastructure Delivery Framework

The NPPF should require all local plans to include an IDP which should be linked to the LTP. At national level an equivalent would be of value. If zero carbon, housing provision and quality places are to be delivered there needs to be considerably more effective mechanisms to ensure action is taken. This should apply to not only housing but all facets of the plan so, rather like the LTP, a process needs to be established to monitor, review and require delivery on the part of the authority/ies and infrastructure partners. They need to be “held to account”. An overview body should be a requirement with the responsibility to secure delivery of the plan. It cannot be left to the development sector if the country is to achieve zero carbon and its wider objectives. The delivery plan must be viable and owned by the collaborative partnership.