

Chartered Institution of Highways & Transportation response to the consultation on Draft NPPF proposals

Theo Naidoo, Policy Officer, Chartered Institution of Highways and Transportation (CIHT), Tel: +44(0)20 7336 1581, Email: Theo.Naidoo@CIHT.org.uk

CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and four international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.

CIHT supports ambitions to ensure that the planning system delivers needed housing, and provides the infrastructure and transport services needed to support that housing. Our members recognise that similar ambitions were at the heart of the original NPPF and several later government initiatives.

CIHT recognises the overriding aim of the proposed revise of the NPPF is in *"bringing more land forward for development and that permissions are turned into homes as soon as possible"* and that tackling the housing shortage is rightly a key policy priority for Government.

CIHT believe that it is possible to significantly improve the pace at which development proposals clear the planning process and deliver high-quality, genuinely sustainable development.

- The NPPF needs to clearly enshrine key policy areas across government to ensure that development is sustainable, critically it is located in the right places and is fully consistent with government policy overall. These policies include reducing carbon emissions, improving air quality, improving health, creating inclusive environments and promoting sustainable transport. Location is fundamental to addressing these objectives.
- The fundamental role that the integration of planning and transport plays in making development sustainable by putting it in the right places needs to be recognised throughout the document and therefore that the document should be clear on the criteria for siting development.
- That the choice and availability of sustainable travel choices is a key factor for sustainable development. This needs to be a fundamental part of the planning process and recognise that transport authorities and operators need to be involved throughout the planning process from initiating the local or strategic plan to the determination of planning applications, thereby becoming part of the solution rather than a hurdle to be overcome.
- The detailed planning and design of developments should emphasise accessibility to a wide range of services by the most sustainable modes of transport. The reality of many new developments is that they are dependent on motor vehicles, incapable of sustaining public transport and are inaccessible by cycling or walking. These continued patterns of development

are likely to continue under the amended framework and make it more difficult to achieve national policy aims.

Delivering homes requires more land per unit, more expensive infrastructure and has a greater impact on nearby communities when single user cars are the encouraged mode of transport.¹ Plots that require multiple parking spaces can support fewer buildings in the same land area and roads must be built to handle high capacity usage.

Creating vital and economically viable town centres requires residents of new developments to be able to access those facilities. If they are poorly sited or can only be reached by car then residents are more likely to use out of town services, reducing footfall in high streets.²

And ensuring that the new communities being created are healthy and safe requires active transport integrated into daily life. The costs of building in unhealthy behaviours is felt by individuals in ill health, employers and the NHS, with physical inactivity estimated to cost £7.4billion annually.³

The changes proposed below will improve the timeframe for delivery of development, recognising that many objections are on transport and environmental grounds. There will be cost benefits for developers, the government, and local planning and transport authorities in addressing transport issues as part of the planning process. Both retrofitting sustainable solutions and providing significant infrastructure if developments are in the wrong place is more expensive than providing sustainable transport measures from the outset.

Given the scale of these challenges the NPPF must provide sufficient support to the planning system to ensure that new developments are part of the solution. This will require moving from a 'predict and provide' model of transport planning in the planning system to one which 'decides and provides' what type of communities and transport we want to see.

1. Introduction

Q1 Do you have any comments on the text of chapter 1?

1. Paragraph 6 should be amended to make clear in what circumstances other statements of government policy are material in plans and applications. Written Ministerial Statements should not allow for circumvention of the sustainable principles contained within the NPPF.

¹ Cost Comparison: Parking Prototype Impacts on Form and Affordability, Prepared by Bureau of Planning and Sustainability, 2012 (<https://www.portlandoregon.gov/bps/article/420062>)

² The pedestrian pound: The business case for better streets and places, Living Streets (https://www.livingstreets.org.uk/media/1391/pedestrianpound_fullreport_web.pdf)

³ Physical activity: applying All Our Health, PHE, 2018 (<https://www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health>)

2. Achieving sustainable development

Q2 Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

2. CIHT supports the presumption in favour of sustainable development and highlights that transport is key to achieving all three objectives. Without well-planned, well-managed and well-maintained networks, meeting the needs of all users it will not be possible for the NPPF to achieve its goals.
3. CIHT agrees that the NPPF needs to clearly enshrine key policy areas across government to ensure that development is sustainable, critically it is located in the right places and is fully consistent with government policy overall. These policies include reducing carbon emissions, improving air quality, improving health, creating inclusive environments and promoting sustainable transport. Location is fundamental to addressing these objectives.

Q3 Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

4. CIHT regards Paragraph 17 of the current NPPF which requires “*patterns of development to be actively managed to make the fullest possible use of public transport, walking and cycling*” to be useful in ensuring developments are accessible via walking, cycling and public transport. This should be enhanced in Chapter 8 of the draft NPPF.

Q4 Do you have any other comments on the text of chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances

5. CIHT regards the provision of infrastructure on Paragraph 8 (a) to be equally relevant to Paragraph 8 (b) and (c) as the social and environmental objectives cannot be achieved without providing the appropriate types of transport infrastructure.

3. Plan making

Q5 Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

6. CIHT has no comment.

Q6 Do you have any other comments on the text of Chapter 3?

7. Paragraph 15 should include a coordinated transport network as a priority. Without providing transport options the ability of ‘*local people to shape their surroundings*’ is weakened.
8. Paragraph 16 (c) should be amended to include transport service providers as well as infrastructure providers. New developments being designed in a manner which prevents efficient and reliable public transport services being

delivered limits residents transport choice and reduces the sustainability of developments.

9. Paragraph 20 should include a clause requiring an overall transport strategy as strategic policy. Not requiring one will have consequences when it comes the interaction with neighbourhood plans.
10. Paragraph 26 should explicitly refer to sustainable transport as a strategic matter.
11. Paragraph 27 should include transport service providers as a relevant body.
12. Paragraph 29 should be amended to address the importance of supporting travel to work areas and functional economic areas which overlap local planning authorities and local highways authorities.
13. Paragraph 36 should be amended to introduce consideration of a public transport plan

4. Decision Making

Q7. The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

14. CIHT supports the publication of all viability assessments to better evaluate costings for developer contributions to transport infrastructure.

Q8. Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

15. CIHT has no further comment.

Q9. What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

16. CIHT has no further comment.

Q10. Do you have any comments on the contents of Chapter 4?

17. The section Pre-application engagement and front loading (paragraph 40 to 47) should be amended to encourage greater engagement with infrastructure providers and transport operators
18. Alterations to Para 57 to include sustainable transport linking to the development

5. Delivering a wide choice of high quality homes

Q11 What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium-sized sites?

19. CIHT has no further comment.

Q12. Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

20. CIHT has no further comment.

Q13. Do you agree with the new policy on exception sites for entry level homes?

21. CIHT acknowledges that those who are eligible for entry level and affordable homes are less likely to be able to support one or multiple cars. These homes should be designed to be accessible by multiple modes of transport.

Q14. Do you have any other comments on the text of chapter 5?

22. Paragraph 62 should be amended to include accessibility by mode of transport as a required policy. Many of the groups listed may not be able to support a motor vehicle(s) and when designing for different groups in the community this must be considered. Affordable housing that is only accessible by private motor vehicle can deprive people of opportunity for employment, community engagement and health.

23. Paragraph 68 should be amended to include accessibility by sustainable modes of transport as a consideration when identifying a 'sufficient supply and mix of sites'. The experience of CIHT members is that it is difficult or impossible to design sustainable transport into development on inherently unsustainable sites.

6. Building a strong, competitive economy

Q15. Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

24. CIHT has no further comment.

Q16 Do you have any other comments on the text of chapter 6?

25. Paragraph 83 (c) should refer to unsustainable transport networks as a limiter on growth. Congestion, unreliable journeys and unnecessarily long journeys deter users from trips based on tourism, retail or employment. The adoption of sustainable transport which allow more efficient usage of road space such as walking, cycling and public transport should be regarded as encouraging local economic growth.

7. Ensuring the vitality of town Centres

Q17. Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

26. Paragraph 83 should include sustainable transport as a policy that promotes growth

27. Paragraph 86 should specify that vital town centres require accessibility by walking, cycling and public transport as towns centres which require a motor

vehicle to access suffer from a more limited range of users, congestion issues and are often less attractive to outside visitors.

28. Paragraph 88 should be amended to refer to 'sustainably accessible' sites to encourage the development of sites that are accessible via walking, cycling and public transport.

Q18 Do you have any other comments on the text of Chapter 7?

29. CIHT has no further comment.

8. Promoting healthy and safe communities

Q19. Do you have any comments on the new policies and chapter 8 that have not already been consulted on?

30. Paragraph 92 should refer to places 'and streets' as the footways, cycleways and carriageways residents use are often vital areas where community activities take place. The provision of dedicated public spaces such as plaza's and parks is welcome but not sufficient to create the environments valued by the public.
31. Paragraph 92 (c) should refer to 'infrastructure that supports walking and cycling' rather than simply encouraging. Further given the impact motor vehicles have on health, through air quality, noise pollution and vehicle incidents, a mention may be made of discouraging high levels of motor vehicle use.
32. Paragraph 93 should recognise the social value of streets and highways to local communities, with much social mixing between different groups and communities occurring on footways rather than in specific destinations.

Q20. Do you have any other comments on the text of chapter 8?

33. CIHT has no further comment.

9. Promoting sustainable transport

Q21 Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

34. CIHT welcomes a clear chapter dedicated to the importance of sustainable transport and would encourage the chapter to be renamed from 'promoting' sustainable transport to 'Providing' sustainable transport
35. Paragraph 103 should be amended to ensure that sustainable transport is considered during 'site identification, construction and use of a new development.'
36. Paragraph 103 should be amended with a further clause highlighting the need for new developments to aim for carbon reductions in construction and usage.
37. Paragraph 103 (a) should be amended to say, "the potential benefits of sustainable transport networks can be realised for new developments". CIHT

believes that by looking at the negative impacts of new developments and then seeking to ameliorate them we are not fully realising the benefits of transport for people and place.

38. Paragraph 103 (c) should be amended from “opportunities to ‘promote’ walking, cycling and public transport use are identified and pursued.” To “opportunities to ‘maximise’ walking, cycling and public transport use are identified and ‘provided for’.”
39. Paragraph 103 (d) should refer to ‘local and national’ environmental impacts to highlight that wider government obligations over climate change and air quality should influence planning decisions.
40. Paragraph 104 should be amended to delete the ‘significant’ as all development should aim at being sustainable and the NPPF should be a key tool in ensuring that the right homes are built in the right places.
41. Paragraph 104 should delete “*However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making*” as the difference between urban and rural environments is often a matter of scale rather than a binary distinction. If developments are aiming to maximise usage of sustainable transport modes than that is true regardless of any rural/urban distinction even if the end results look significantly different. It also may open opportunities for fruitless debate during the planning process.
42. Paragraph 105 (c) should consider whether ‘widen transport choice’ is the correct phrasing as certain developments particularly with dense housing may want to limit transport choice, particularly when it comes to private car usage.
43. Paragraph 106 should be inclusive of parking for motorcycles and cycles.
44. Paragraph 106 should recognise that managing parking is a key part of managing demand and the network management impact should be addressed when creating local parking standards.
45. Paragraph 106 (e) should specify that it is the ability to charge electric vehicles that is relevant rather than the number of spaces available. There have been chargers installed in new developments which share a single power supply between multiple cars. This fulfils planning requirements for spaces but can result in vastly increased charging times and make electric car use an unattractive option.
46. Paragraph 107 should be removed. While CIHT supports developments providing suitable and realistic levels of parking for residents (see [residential parking guidance note](#)) maximum parking standards are an important part of managing local transport strategy. In town centres, there may be reasons apart from network management to enforce maximum parking standards.
47. Paragraph 108 (a) should replace the word ‘promote’ with ‘build facilities for’
48. Paragraph 110(c) include inclusive in the description of places
49. Paragraph 111 Add measures to ensure that travel plans are implemented and the impacts assessed against the plan

Q22. Do you agree with the policy change that recognises the importance of general aviation facilities?

50. CIHT has no further comment.

Q23 Do you have any other comments on the text of chapter 9?

51. CIHT has no further comment.

10. Supporting high quality communications

Q24. Do you have any other comments on the text of chapter 10?

52. CIHT has no further comment.

11. Making effective use of land

Q25. Do you agree with the proposed approaches to using and to utilise land, reallocating land for other uses and making it easier to convert land which is an existing use?

53. CIHT has no further comment.

Q26. Do you agree with the proposed approach to employ minimum density standards where there is a shortage of land for meeting identified housing needs?

54. CIHT has no further comment.

Q27. Do you have any other comments on the text of chapter 11?

55. CIHT particularly welcome Para 122(c)

56. Paragraph 123 should be amended with a clause highlighting that building for walking, cycling and public transport can enable more dense usage of land and help create more dwellings dependent on less expensive infrastructure.

12. Achieving well-designed places

Q28. Do you have any comments on the changes of policies in chapter 12 that have not already been consulted on?

57. CIHT has no further comment.

Q29. Do you have any other comments on the text of chapter 12?

58. CIHT has no further comment.

13. Protecting the green belt

Q30. Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt and to provide for other forms of development that are not “inappropriate” in the Green Belt?

59. CIHT has no comment.

Q31. Do you have any other comments on the text of chapter 13?

60. Paragraph 137 should be amended to change 'promote' and 'should be taken into account' to 'ensure' and 'are taken into account'. The fundamental aims of the Green Belt of preventing urban sprawl, keeping land permanently open and functioning as the 'green lungs; of an urban environment are best fulfilled by not encouraging unnecessary motor traffic.
61. Paragraph 145 (c) should be amended to add "and supports sustainable transport

14. Meeting the challenge of climate change, flooding and coastal change

Q32. Do you have any comments on the text of chapter 14?

62. By being able to better assure residents that new developments will have limited impact on their journeys, will require limited parking and will not require the construction of major new roads may mean reduced legal challenges to developers and lower the overall costs of construction.

Q33. Does paragraph 149 need any further amendments reflect the ambitions in the Clean Growth Strategy to reduce emissions from buildings?

63. Paragraphs 149 should be amended to reflect the role of transport in driving climate change. It should specify that new developments can help reduce greenhouse gas emissions through location, orientation, design and accessibility through sustainable transport.

15. Conserving and enhancing the natural environment

Q34. Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the (Government's) 25-year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

64. CIHT has no further comment.

Q35. Do you have any other comments on the text of chapter 15?

65. CIHT has no further comment.

16. Conserving and enhancing the historic environment

Q36. Do you have any comments on the text of chapter 16?

66. CIHT has no further comment.

17. Facilitating the sustainable use of minerals

Q37. Do you have any comments on the change of policy and chapter 17, or in the other aspects of the text in this chapter?

67. CIHT has no further comment.

Q38. Do you think the planning policy on minerals would you better contained in a separate document?

68. CIHT has no further comment.

Q39. Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

69. CIHT has no further comment.

Implementation

Q40. Do you agree with the proposed transitional arrangements?

70. CIHT has no further comment.

Q41. Do you think that any changes should be made to the planning policy for traveller sites as a result of the proposed changes to the Framework set out in this document? If so, what changes should be made?

71. CIHT has no further comment.

Q42. Do you think that any changes should be made to the Planning Policy for Waste, as a result of the proposed changes to the Framework set out in the document? If so, what changes should be made?

72. CIHT has no further comment.

Q43. Do you have any comments on the Glossary?

73. CIHT has no further comment.