

Practitioners Group draft National Planning Policy Framework – Response from Campaign for Better Transport

Background

Campaign for Better Transport has a history of working on the transport and environmental implications of planning policy. We ran a recent seminar on this issue with housing developers, transport operators, NGOs and civil servants from the Department for Communities and Local Government and the Department for Transport. This response draws on the conclusions from that seminar. It is not a wishlist of what we would want to see in the NPPF but flags up those issues of most concern and which we would regard as the absolute minimum changes needed to the NPPF. Having looked at the draft produced by the NPPF practitioners group, we are very concerned at some of the implications that this would produce in practice, particularly for congestion and environmental impacts from increased traffic levels.

Comments on draft NPPF

Campaign for Better Transport is concerned about the wider implications of the changes to the planning system arising from the Localism Bill, but this response is limited to the practitioners' draft NPPF.

Overall, we welcome recognition of shifting the transport system in favour of more sustainable modes and the objective on reducing the need to travel. However, the detail of what is recommended which follows is often caveated by language like "where practical", etc which would undermine recommendations like this in actual decisions by planning authorities or at appeal.

In addition, the NPPF should recognise more strongly environmental limits in its recommendations, particularly the need to cut carbon now and in longer timeframes, and endorse tools or instruments that should be applied to new development to ensure this happens.

Delivering Sustainable Development

We have supported the call from Wildlife and Countryside Link and others for the Localism Bill to include a clause reaffirming that the purpose of planning is the achievement of genuinely sustainable development. This must be accompanied by a statutory definition of sustainable development. Such a definition will help to provide greater certainty for communities, local decision-makers and developers. It will also identify a common goal for everyone engaged in planning.

Defining sustainable development in the Localism Bill would not impose inflexible boundaries on communities as is claimed. Instead it enables the certainty, innovation and progress required to turn sustainable development from principle into practice. The statutory definition and the roles and responsibilities of planning authorities should in turn be supported and expanded through other strategic documents such as the NPPF and the guidance for the duty to co-operate.

We are very concerned about statements made by members of the practitioners group (and in the draft) about the status of existing local plans once the NPPF is introduced. Members of the practitioners group

have said that the NPPF can include the kind of vague language mentioned above as local plans will provide the detail and definitions to back this up. However, if existing local plans are ruled to be not in compliance with the new NPPF and applications will be judged against the NPPF itself, this could allow many poor and damaging developments to go ahead until certificates of conformity are approved. There would rightly be scepticism about the Government's intentions on planning, to say the least, if this was to happen.

Business and Economic Development

We welcome the continuation of the towns centre first policy but the NPPF needs to include a strong needs test for any out of town development, as well as the sequential test. And again, the document should avoid language like "where suitable" or "where practical".

Transport

As stated above, we welcome recognition of shifting the transport system in favour of more sustainable modes and the objective on reducing the need to travel but are concerned at the caveats that follow.

There should be a much stronger statement on when local authorities can refuse planning permission on transport grounds, rather than a definition which just talks about impacts which are "so severe". The accumulated effects of development which individually may not be huge can collectively have very significant traffic and congestion impacts.

We welcome the inclusion of travel plans. Again, to be meaningful the NPPF should say that travel plans should include targets for mode share. This does not need to necessarily cross the localist agenda as these could be set by local authorities, but they need to be included if travel plans are to be really effective (as the evidence shows).

The practitioners' draft mentions parking standards. Evidence shows that provision of parking is important in determining travel patterns. Maximum parking standards for commercial development have been shown to be effective, particularly when allied to travel plans, in promoting development that enhances rather than undermines town centres and minimizes single occupancy car use. Given the dangers of competition between authorities on this, we would like the current national maxima for retail and business development to stay, but at the minimum we would like the NPPF to require authorities to set maximum standards themselves allied to the travel plans with mode share targets as mentioned.

The NPPF must ensure protection of railway alignments for future use (especially given growth of rail usage and likely need for additional capacity in future with higher fuel prices and need to cut carbon from transport), and of depots for freight, as well as station development or re-openings for passenger travel.

Additionally, the practitioners' draft makes very little reference to freight transport. The draft for consultation needs to address the importance of freight and detail how to encourage a shift from road to rail (and water).

Housing

We understand that CLG Ministers want to move away from density targets. However, the draft NPPF is very weak on this and, at the very least, should use language about intensifying development around public transport interchanges and where there are good public transport services.

The practitioners' draft NPPF does not define rural. While CLG Ministers may see some merit in being more flexible on rural development, there is a danger that this could be interpreted to include towns (including some quite sizeable towns) within a rural county.

The draft for consultation should also have a more sophisticated attitude to location relating to transport, and particularly avoid major traffic generating development near the strategic or primary road network where this can promote longer distance commuting and longer distance travel to access shops and services by car.

The NPPF should set out that local authorities should follow a search sequence for identifying sites, with a phased release for sites so that these can be integrated with development of public transport services (especially to ensure that they run from the start of development) and existing patterns of development. The separate guidance on processes for local plans should make clear the need to link local plan development with local transport plans and to consult and engage with transport providers.

Design

This section should also consider the design of streets and the public realm, and their transport implications (consistent with Manual for Streets and Manual for Streets 2). It should include reducing clutter and the potential for “filtered permeability” to give higher priority to pedestrians and cyclists, which would be consistent with the transport section on page 23 of the draft. In particular, this means prioritising people over traffic in the design of development and the allocation of road space

Climate Change, Flooding and Coastal Change

The inclusion of location is welcome, but this should be spelt out by making clear that poor location will increase the demand for travel and increase CO2 from traffic .

Natural and Local Environment

On the natural and local environment, the draft for consultation should ensure that air quality is included in any reference to pollution, particularly given legally binding EU targets.

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Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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